



**FORT CAMPBELL  
LEAD-BASED PAINT  
MANAGEMENT PLAN  
DECEMBER, 2014  
(REVISED)**

**INSTALLATION LEAD-BASED PAINT  
MANAGEMENT**



**DEPARTMENT OF THE ARMY  
INSTALLATION MANAGEMENT COMMAND, ATLANTIC REGION  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FT CAMPBELL  
39 NORMANDY BOULEVARD  
FORT CAMPBELL, KENTUCKY 42223-5617**

**LEAD-BASED PAINT MANAGEMENT PLAN**

**LETTER OF PROMULGATION**

1. Army Regulation (AR) 200-1, "Environmental Protection and Enhancement," and AR 420-1, "Army Facilities Management," outline a strategy for an installation lead-based paint (LBP) management program.
2. The objective of the Lead-Based Paint Management Plan is to maintain a permanent record on the status and condition of all LBP in the installation's facility inventory. It must be updated on a continual basis.
3. Design of the plan is to be consistent with AR 200-1 and AR 420-1. Known as the Fort Campbell Lead-Based Paint Management Plan, this plan is hereby approved and implemented at Fort Campbell, Kentucky.

APPROVAL RECOMMENDED BY:

  
\_\_\_\_\_  
JAMES F. DUTTWEILER  
Director of Public Works

APPROVED BY:

  
\_\_\_\_\_  
DAVID L. DELLINGER  
COL, SF  
Commanding

DATE: 18 Dec 2014

# TABLE OF CONTENTS

LETTER OF PROMULGATION	I
DEFINITIONS AND TERMS	IV
GLOSSARY OF ABBREVIATIONS	IX
CHAPTER 1 INTRODUCTION	
1.1 PURPOSE	1
1.2 BACKGROUND	2
CHAPTER 2 ORGANIZATIONAL ROLES AND RESPONSIBILITIES	
2.1 GENERAL	4
2.2 RESPONSIBILITIES	6
Garrison Commander	6
Director of Public Works (DPW)	6
DPW Environmental Division	6
DPW Engineering Division	8
DPW Maintenance Division	9
DPW Business Operations & Integration Division	11
Fort Campbell (DPW) Housing Division	11
Installation Medical Authority (Preventive Medicine)	11
Mission and Installation Contracting Command (MICC)	12
Defense Logistics Agency (DLA) Disposition Services–Campbell	13
Staff Judge Advocate (SJA)	13
Installation Safety Office (ISO)	13
Public Affairs Office (PAO)	14
Fort Campbell School System (DODEA)	14
Directorate of Family, Moral, Welfare and Recreation (DFMWR)	14
CHAPTER 3 Lead Based Paint (LBP) MANAGEMENT TEAM	15
CHAPTER 4 NOTIFICATION	
4.1 Requirements	16
4.2 Information Dissemination	16

<b>CHAPTER 5 TRAINING</b>	
5.1 Training Requirements	18
5.2 Management and Abatement Training	18
5.3 Training of Maintenance Workers	19
5.4 Environmental Quality Officers	19
<b>CHAPTER 6 RECORDKEEPING</b>	
6.1 Purpose	21
6.2 Types of Records	21
6.3 Record Retention	21
<b>CHAPTER 7 QUALITY CONTROL AND QUALITY ASSURANCE</b>	
7.1 Quality Control	22
7.2 Quality Assurance	22
<b>CHAPTER 8 INSTALLATION ASSESSMENT</b>	
8.1 Purpose	23
8.2 Installation Assessments	23
<b>CHAPTER 9 INSTALLATION ABATEMENT PLAN</b>	
9.1 Purpose	24
9.2 Abatement Response Based Upon Lead Levels in Paint	24
9.3 Abatement Projects	25
9.4 Renovation, Repair and Painting (RRP) Plan	26
<b>APPENDICES</b>	
APPENDIX A LBP Waste Characterization Study	A-1
APPENDIX B Army Guidance, LBP Disposal from Housing	B-1
APPENDIX C References	C-1
APPENDIX D OMA Buildings and Survey Status	D-1
APPENDIX E OSHA Interpretation Letter – Using XRF Device	E-1
APPENDIX F Protocol for Lead-Containing Paint Surface Preparation	F-1
<b>LIST OF FIGURES</b>	
Figure 2-1 Fort Campbell LBP Management Organization	5
Figure 2-2 Fort Campbell LBP Control Diagram	5
<b>LIST OF TABLES</b>	
Table 5-1 Required / Recommended Training	20

## DEFINITIONS AND TERMS

**Abatement:** A comprehensive process of eliminating exposure or potential exposure to lead paint and lead dust through removal, replacement, enclosure, or encapsulation. Abatement must include testing, measures for worker protection, containment of dust and debris, cleanup and disposal of waste, and clearance testing.

**Accredited or Accreditation or Certified:** When referring to a laboratory means that such laboratory is accredited according to the Environmental Protection Agency. When referring to a person, means someone who is certified by the State if the state has a program or the Environmental Protection Agency if the state does not have a program. Kentucky and Tennessee have certification programs that require the completion of an Environmental Protection Agency Certified Course with one day updates every second year; such as the Lead-Based Paint Inspectors and Risk Assessors course. In addition, both the State of Kentucky and Tennessee have fees to become certified. It should be stressed however that these certification requirements are only required in relation to designated “target facilities.”

**Disposal:** The testing, containment, transporting, and disposal of waste generated on an abatement project in accordance with federal, state, and local regulations.

**Hazardous Waste:** Per the Resource Conservation and Recovery Act, for Lead-Based Paint the hazardous waste characteristic concentration limit is 5 part per million (ppm); analyzed as “leachable” using Toxicity Characteristic Leachate Procedure.

**Inspection:** Means (1) a surface-by-surface investigation to determine the presence of lead-based paint, and (2) the provision of a report explaining the results of the investigation.

**Lead-Based Paint:** Means:

1. **Paint applied (in situ).** Means paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter (mg/cm<sup>2</sup>) when using the x-ray fluorescence analyzer, or, 0.5 percent by weight (or 5000 ppm) (equivalent to mg/cm<sup>2</sup>) when taking bulk samples using laboratory tests involving atomic absorption spectroscopy or inductively coupled plasma atomic emission spectrometry per the EPA and Housing and Urban Development. *This level (1.0 mg/cm<sup>2</sup> or 5000 ppm) is used as the trigger for abatement, although, it is not specified when abatement must be done.*

**2. Paint in liquid form.** Lead-Based Paint for consumer use: Per the Consumer Product Safety Commission, when purchasing paint for residential use, LBP is defined as any paint that contains equal to or more than 0.009% (90 ppm) (16 CFR 1303) lead by weight of the total nonvolatile content of the liquid paint or the weight of the dried paint film. Although lead-based paint may be used in industrial applications, no lead-based paint as defined by the Consumer Product Safety Commission shall be sold or purchased for residential use. **(Any paint purchased for any reason that contains equal to or more than 90 ppm shall be considered a lead-based paint.)**

**Lead Containing Paint:** Lead containing paint is a Fort Campbell term, but with Occupational Safety and Health Administration requirements. Chapter 9 discusses the Occupational Safety and Health Administration requirements.

**Lead-Based Paint Free:** Means target housing that has been found to be free of paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter or 0.5 percent by weight. Per the Consumer Product Safety Commission, “lead-free” is paint less than 90 ppm.

**Lead-Based Paint Hazard:** Lead-based paint hazard means any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as identified by the Administrator pursuant to the Toxic Substance Control Act (TSCA) section 403.

**Lead-Contaminated Dust:** Hazard levels for dust (and cleanup levels), defined by Department of Housing and Urban Development are:

1. 40 ug/ft<sup>2</sup> – Hard Floor and Carpeted Floor
2. 250 ug/ft<sup>2</sup> – Interior Window Sills
3. 400 ug/ft<sup>2</sup> – Window Wells (Troughs)
4. 800 ug/ft<sup>2</sup> – Exterior Concrete

There are three analytical methods commonly used for dust analysis: (1) X-Ray Florescence, (2) Atomic Absorption Spectroscopy and (3) Inductive Coupled Plasma Analysis. When wipe sampling for settled lead-contaminated dust, refer to Department of Housing and Urban Development’s guidelines, *Appendix 13.1*.

**Lead-Contaminated Soil:** The Laboratory analytical methods for soil are the same as for dust: X-Ray Florescence, (flame) Atomic Absorption Spectroscopy, and Inductive Coupled Plasma Analysis. For bare soil, for a hazard to exist according to:

Department of Housing and Urban Development guidance:

1. Less than 400 ug/g – Okay
2. Above 400 ug/g – Interim Controls (Children) (small, high contact area)  
(Should not be play area or high contact area for children)
3. Above 2000 ug/g – Interim Controls (Adults) (when equal to or greater than 9ft<sup>2</sup> of bare soil)
4. Above 5000 ug/g – Abatement of bare soil recommended

EPA guidance:

1. Less than 400 ug/g – Okay
2. Above 400 ug/g – Interim Controls recommended for child’s play area
3. Above 1,200 ug/g – Interim Controls recommended for other residential yard areas
4. 5,000 ug/g – Abatement of bare soil recommended

**Manifest:** The shipping document used for identifying the quantity, composition, origin, routing, and destination of hazardous waste during its transportation from the point of generation to the point of treatment, storage, and disposal.

**Renovation, Repair, and Painting:** Activities that disturb lead-based paint in target housing and child occupied facilities.

**Response action (Lead-Based Paint Abatement Response Action):** The response action to a lead-based paint that has been damaged and presents a risk to occupants. Accomplishment of this action should be by EPA or state certified abatement workers and specified in the contract as such (must be certified for work in target facilities). Lead-Based Paint Abatement Response Actions protect human health and the environment from lead. Operations and Maintenance is always the action until one of the response actions is required. Operations and Maintenance would include cleaning work practices and periodic surveillance to maintain in good condition, and minimizing and controlling lead-based paint disturbance. Of the list below, the first of the response actions, “Interim Control Measures” are those actions that are only intended to be **temporary** controls; the remaining are considered **permanent**, meaning that the response action will have at least a twenty year control effect.

**1. Interim Control Measures (In-place management)** – The term is used to refer to a broad range of strategies and methods for controlling exposures temporarily and preventing poisonings or reducing human exposure from lead in paint pending permanent removal of LBP.

- a. **Paint Film Stabilization** – repainting.
- b. **Friction and Impact Reduction Treatments** – treatment to the structural component to reduce dust generation (treatment may generate dust).
- c. **Dust Removal** – HEPA vacuuming, wet wiping.
- d. **Soil Covering (non-permanent)** – soil covering.

2. **Abatement** – Measures designed to permanently eliminate lead-based paint hazards.

a. **Encapsulation** – accomplished by coating or sealing the lead-based paint with some durable coating which is applied as a liquid to the painted surface to prevent or control chalking, flaking lead-containing substances from becoming part of house dust or accessible to children. Lead-free paint is not to be considered as an encapsulant.

b. **Enclosure** – accomplished by enclosing the painted surface with a durable substance such as drywall, paneling, metal, siding, plaster, or some other construction material to permanently seal the existing surface.

c. **Permanent Covering of Soil** – includes the covering of soil with concrete, asphalt, or another permanent material.

d. **Removal** – accomplished by separating the paint from the substrate and disposing of the removed paint. The removal methods include, but are not limited to, on-site mechanical removal (scraping, abrasive removal, removal with a needle gun), on-site chemical stripping, or off-site chemical stripping. This response action also includes the option to remove any contaminated soil and dispose of it off-site in accordance with RCRA regulations.

e. **Component Replacement** – accomplished by removing both the paint and its substrate and disposing of both. The removed components are then replaced to complete the abatement. Removal and replacement is a strategy of abatement that entails the removal of components such as windows, doors, and trim that have lead painted surfaces and installing new components free of lead paint.

**Risk Assessment:** Means an on site investigation to determine and report the existence, nature, severity, and location of lead-based paint hazards in residential dwellings, including: (1) Information gathering regarding the age and history of the housing and occupancy by children under age 6; (2) Visual inspection; (3) Limited wipe sampling or other environmental sampling techniques; (4) Other activity as may be appropriate; and (5) Provision of a report explaining the results of the investigation. The purpose of conducting a lead-based paint risk assessment is to determine whether lead-based paint hazards exist and, if so, provide solutions on reducing and managing such hazards until complete abatement takes place.

**Self-Help:** Means work accomplished by the building occupants instead of by government or contract workers. All Self-Help work must be approved beforehand to ensure that the occupants do not disturb LBP. Further, work may be approved based upon a Standard Operating Procedure (SOP), or set of work practices, being strictly followed.

**Target facilities:** Government-owned or leased facilities *constructed prior to 1978* which are used regularly by children six years old or younger or by pregnant women such as family housing, hospital pediatric areas, recreation centers for children, child development centers, family childcare homes, schools, playgrounds, and similar facilities. Exceptions include housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing) or any 0-bedroom dwelling. The 0-bedroom dwelling exception does not apply in Kentucky per 18 KRS 211.900 and 211.9061.

# GLOSSARY OF ABBREVIATIONS

AR	Army Regulation
CFR	Code of Federal Regulations
CPSC	Consumer Product Safety Commission
CDC	Child Development Center
DA	Department of Army
DPW	Directorate of Public Works
DLA	Defense Logistics Agency
EPA	Environmental Protection Agency
HUD	Department of Housing and Urban Development
IMCOM	Installation Management Command
LCP	Lead Containing Paint
LBP	Lead-Based Paint
LBPMCO	Lead-Based Paint Management and Control Officer
LBPMP	Lead-Based Paint Management Plan
LBPMT	Installation Lead-Based Paint Management Team
OMA	Operations and Maintenance Army
O&M	Operation & Maintenance
OSHA	Occupational Safety and Health Administration
PEL	Permissible Exposure Limit
RCRA	Resource Conservation and Recovery Act
RRP	Renovation, Repair, Painting
SOP	Standard Operating Procedure
SSPC	Steel Structures Painting Council
TCLP	Toxicity Characteristic Leachate Procedure
TSCA	Toxic Substance Control Act
XRF	X-ray Fluorescence

# Chapter 1

## INTRODUCTION

### 1.1 PURPOSE

The purpose of the Department of the Army's Lead-Based Paint (LBP) program is to establish responsibility and standards for identification and control of LBP and lead-containing dust in "target facilities", first, then other facilities. Army Regulation (AR) 200-1, "Environmental Protection and Enhancement," and AR 420-1 outline a strategy for an installation Lead-Based Paint management program. The design of the Lead-Based Paint Management Plan (LBPMP) for Fort Campbell is to be consistent with these regulations. This plan maintains a permanent record on the status and condition of all LBP in all OMA target facilities, and other facilities as needed, in the Fort Campbell inventory. It provides for the updating of these records on a continual basis until the LBP is removed from facilities. The management plan provides for:

Primary Documentation - The management plan serves as the primary documentation for the cumulative results of the facility LBP control program.

Mechanism for Oversight - The management plan provides the mechanism for oversight of the entire LBP control program.

Maintaining Credibility - The management plan serves as a major item for maintaining the credibility of the LBP control program.

- Federal agencies involved in lead hazard management are driven by one goal: to protect the human health from unwitting exposure to LBP.
- Army policy is to manage LBP in place as long as practical or until scheduling a facility with LBP for disposal. This policy requires installations to have specific procedures for managing facilities and protecting personnel from the hazards associated with LBP. It is the Army's and Fort Campbell's intention to abate LBP when it is a potential threat to human health, mandated by regulation, or whenever it is opportune to do so.

## 1.2 BACKGROUND

Lead is a heavy, soft, malleable bluish metal. It generally occurs in nature in the form of ores. Once mined, processed and introduced into man's environment, it becomes a potential health hazard.

Medical Concerns - Lead in the body can cause serious damage to the central and peripheral nervous system, the cardiovascular system, and the kidneys. Lead affects every bodily system. The effects on intelligence and behavior are the most important, especially for children. The medical community has concluded that exposures to low levels of lead can have an adverse effect on health. This seems to be particularly true for children, who absorb about 40 percent more lead than an adult when an exposure occurs. Exposure to high concentrations of lead can cause retardation, convulsions, coma, and, sometimes, death.

Sources of Lead - Sources of lead in our environment include LBP, lead in water, and lead-contaminated soil as well as other sources. Before 1990, leaded gasoline was considered by the EPA to be the most likely source of exposure to the general population, and has been phased out.

Because of its properties, lead has been used as a pigment for paints. Structures built before 1978, especially those built in 1950 or before, are believed to contain paint with high levels of lead. Excessive lead levels may be found in paints, water, dust and soil surrounding a painted surface. Housing and childcare centers are particular areas of concern. Lead dust is believed to be the most likely cause of lead poisoning in children. Young children are especially susceptible to lead dust because they engage in many hand-to-mouth behaviors. Interior lead paint dust can come from the normal abrasion of painted surfaces such as opening and closing windows and doors. Lead from chalking and sluffing paint on the exterior of houses can accumulate in the soil around homes and be carried inside by foot traffic, increasing the levels of lead dust in the home.

Concerns - Health, safety and the environment are the three main concerns.

- The key focus of the health and safety aspects include the prevention of childhood lead poisoning, abatement of LBP hazards and protection of construction/maintenance workers.

- The key environmental concern is proper waste disposal: If paint is hazardous when it is on a building, could it become “hazardous waste” when the building component is disposed? Construction/demolition debris has historically been overlooked as a potential hazardous waste stream. Common practice has been to place the debris in construction debris landfills. The Army Environmental Center has taken the initiative to conduct a waste characterization study on LBP contaminated demolition debris (Executive Summary at Appendix A). The study focused on the debris generated from the demolition of Army WWII era structures but also addresses other waste items such as those resulting from abatement and renovation activities. The findings showed whole-building demolition debris (e.g., Army WWII-era structures) could be characterized as non-hazardous waste. Small-scale debris generated during renovation, maintenance, or abatement activities such as paint chips, blast grit/media, or personal protective equipment is more likely to be characterized as “hazardous waste” due to the concentrated mass of LBP. Appendix B contains Army guidance regarding disposal of LBP wastes generated at military residences, including barracks. This guidance indicates the installation may dispose of LBP wastes generated at residences as non-hazardous waste under the Resource Conservation and Recovery Act (RCRA) household waste exclusion. The Army guidance also briefly discusses lead in soil around houses.
- The primary purpose of the inspection and abatement effort is LBP. Flaking and peeling paint represents an obvious exposure concern in homes, child development centers, schools, and playgrounds. Less obvious but equally dangerous is lead-containing dust generated during renovation, demolition, sanding, and stripping of painted surfaces. Lead-containing dust can also be generated when surface abrasion occurs during such routine activities as opening and shutting doors and windows.
- Soil also represents a potential exposure concern, especially in urban areas, where the levels of past auto and industrial emissions have left significant residues of lead. In more rural areas, where many military bases are located, lead-tainted soil is found near homes and buildings where deteriorated exterior paint has leached into the soil from rain. Very high levels of lead in soil have been found around steel structures such as bridges, water towers, and shooting ranges.
- The Federal government has taken a number of key actions to reduce risks associated with lead exposures. It has banned the use of lead in house paint. This action and many others have been very effective in reducing major sources of lead exposure. To protect society from exposures and the associated risks, major efforts to control and contain, or remove deteriorating LBP must be performed. By using proper techniques and work procedures, the risk to removal workers and the environment will be much lower.

## Chapter 2

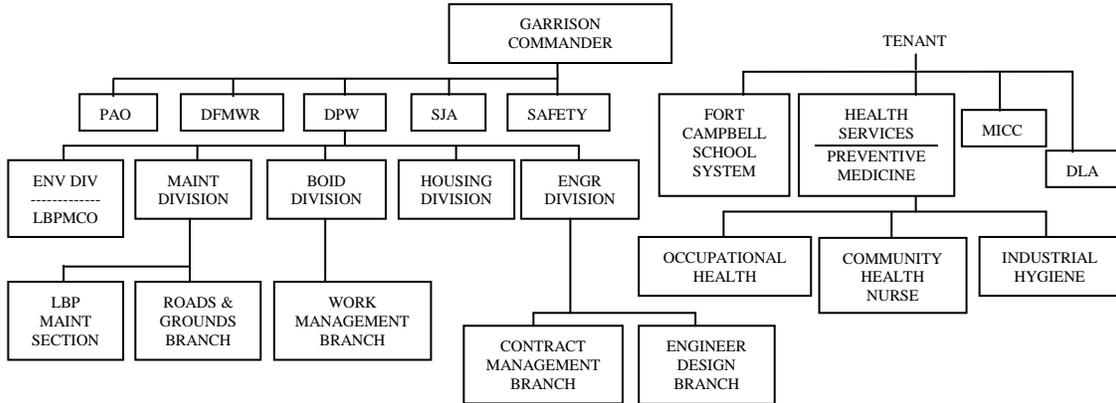
# **ORGANIZATIONAL ROLES AND RESPONSIBILITIES**

### 2.1 GENERAL

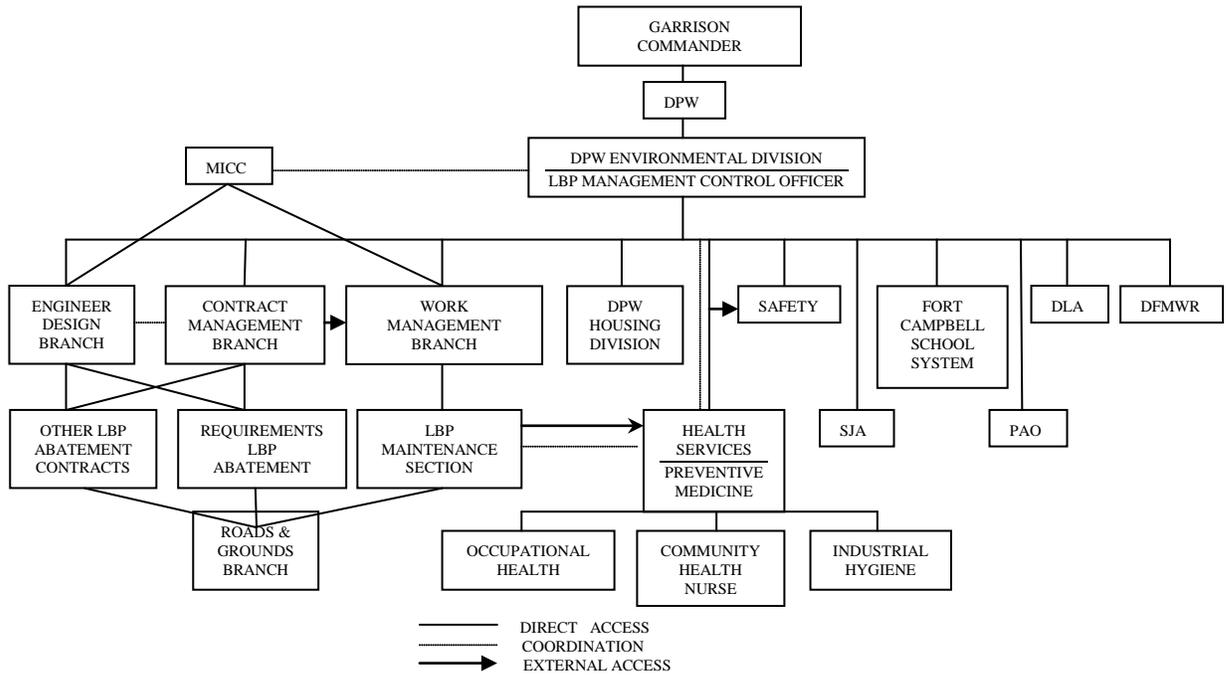
The LBPMP establishes LBP control procedures to include identification, abatement activities, cleanup, disposition, and monitoring of LBP in Fort Campbell facilities. It establishes an Installation LBP Management Team (LBPMT). It identifies responsibilities of Public Works, Installation Medical Authority (Preventive Medicine), Contracting (MICC), and others. Figure 2-1 has an illustration of the LBP management organizational chart. Figure 2-1 represents the primary LBP management control functions in the chain of command. Figure 2-2 has an illustration of an LBP management and control diagram. Figure 2-2 identifies how the Installation LBPMT operates, focusing attention upon the Directorate of Public Works (DPW) Environmental Division for installation management and control of the program. The intent of the LBP management and control diagram is not to represent the chain of command; the intent is to represent how the LBP control program team members may effectively operate in relation to other organizations.

The LBPMT should review this document, understand Army Policy and implement it at the installation level. It will be necessary for the LBPMT to keep abreast of regulatory developments through its review of any changes in Title 29 Code of Federal Regulations (CFR) (Department of Labor) and Title 40 CFR (Protection of Environment). LBPMT members must attend the annual LBP awareness training to maintain a current awareness of new regulations and guidance.

**FIGURE 2-1. FORT CAMPBELL LEAD-BASED PAINT MANAGEMENT ORGANIZATION (CHAIN OF COMMAND)**



**FIGURE 2-2. FORT CAMPBELL LEAD-BASED PAINT MANAGEMENT AND CONTROL**



## 2.2 RESPONSIBILITIES

The **Garrison Commander** will:

- Establish and execute a LBP Management Plan in support of DA and IMCOM LBP management policies.
- Program and budget adequate resources to execute an effective LBP management program.

The **Director of Public Works** will:

- Establish an Installation LBP Management Team and appoint a LBP Management and Control Officer (LBPMCO) within the DPW, Environmental Division. The team will consist of representatives from:
  - DPW Environmental Division.
  - Other Applicable DPW Divisions/Branches.
  - Preventive Medicine Service (Pediatrics may also be represented).
  - Mission and Installation Contracting Command (MICC).
  - DLA Services - Campbell (DLA).
  - Installation Safety Office. (ISO)
  - Staff Judge Advocate (SJA).
  - Public Affairs Office (PAO).
  - Fort Campbell School System.
  - Directorate of Family, Moral, Welfare and Recreation (DFMWR).
- Use the Installation LBPMT to update, coordinate, and execute this Installation LBPM.
- Ensure projects are reviewed for the presence of LBP.

The **DPW Environmental Division** will:

- Assign an installation LBPMCO. The LBPMCO will be chairperson for the installation LBPMT. The LBPMCO has overall responsibility for development and implementation of all aspects of the LBP management program.
- Program and budget personnel, training, and contractor support services.
- Conduct periodic inspections of the In-House LBP Abatement Team and contract LBP abatement means and methods.

- The LBPMCO has the authority to make changes to or suspend operations of the In-House LBP Abatement Team.
  - The LBPMCO (or representative) should be considered for appointment as a contracting officer's representative (COR) providing information and communication between DPW Contract Management Branch or the MICC and contractor operations. (Will review contractor submittals, including training certifications, respirator fit test records, and medical records.)
- The LBPMCO will review all LBP related work plans and specifications generated by the DPW Engineer Design Branch and Maintenance Division to ensure work practices specified in the OSHA Lead Standard, 29 CFR 1926.62, are adequately addressed . The LBPMCO will assist project planners and designers in determining if proposed projects will impact lead and how to deal with it.
  - Develop and maintain installation LBPMP to be revised every 3 years.
  - Provide technical consulting services to the Fort Campbell staff involved in LBP activities.
  - Serve as the liaison between Fort Campbell and all regulatory agencies except Department of Labor (OSHA) (Installation Safety responsibility) for LBP activities.
  - Support In-House LBP Abatement Team by providing Industrial Hygiene Services for abatement projects and consultation.
  - Ensure facilities constructed prior to 1978 are surveyed for the presence of LBP by maintaining / updating the LBP database. Use the LBP database to illustrate the results of all maintenance and construction activities that change the status of LBP in the inventory. Indicate LBP location and sampling locations on floor plans. Record the condition, quantity, and exposure potential of the paint/painted surface. The Environmental Division will compile and maintain LBP related information in readily assessable format. Maintain:
    - Present written database (set of books) and computerized database (ADAM database and electronic drawings).
    - Record of events and activities relating to or affecting LBP in Fort Campbell facilities.
  - Once LBP survey requests are received, coordinate completion of facility surveys before renovation, demolition, maintenance, and other installation public works activities that may disturb lead-containing materials.
  - Plan and program re-inspections to assess the condition and status of painted surfaces and other lead hazards as needed.
  - Provide LBP awareness training to Unit Environmental Quality Officers, DPW Maintenance Division and other applicable government staff.

- Conduct periodic review of the In-House LBP Abatement Team training for proper training and certifications.
- Promote general public education and awareness of LBP management, health, and safety.
- Initiate formal requests to have all deteriorated LBP repaired or removed. Recommend immediate remedial action where health hazards are identified.

**The DPW Engineering Division will:**

- Ensure projects are reviewed for the presence of LBP and project designs address the presence of LBP and stipulate the requirement to comply with all OSHA, EPA and state LBP control regulations. Obtain applicable LBP assessment results during project review. Ensure the In-House LBP Abatement Team or LBP removal Requirements Contractor is contacted for removal or abatement prior to performance of work.
- Ensure the LBPMCO reviews LBP related specifications generated by the Engineer Design Branch to ensure work practices specified in OSHA 29 CFR 1926.62 are adequately addressed. Review contractor submittals, including training certifications, respirator fit test records, and medical records.
- Include the LBPMCO in review of the initial design phase of a project or work requirement development, to determine potential areas of concern. If necessary, a pre-design LBP survey may be conducted. The survey may include a visual inspection and bulk sampling to assess lead hazards. If hazards are identified, the planners, designers, and workers will incorporate necessary abatement procedures into their work plans or contract documents. Unified Facilities Guide Specifications 02 83 19.00 10, Lead Based Paint Hazard Abatement, Target Housing & Child Occupied Facilities, 02 83 13.00 20, Lead in Construction, and 02 82 33.13 20, Removal/Control and Disposal of Paint with Lead, will be used in the preparation of LBP abatement specifications.
- Obtain the “LBP Abatement Supervisors” and “LBP Project Designers” training courses for those who will design abatement actions in target facilities. Project designers who design abatement actions will familiarize themselves with all applicable LBP regulations.
- Specify in contract documents that contractors performing LBP abatement provide MICC with the following for each worker, to be reviewed for compliance: Lead training certificates, Respirator fit test records, and Medical exams including baseline blood lead test results and post-abatement medical exams.
- Ensure proper care of LBP records.

- Ensure contractors adhere to OSHA’s Construction Standard for LBP (29 CFR 1926.62) during the removal and disposal of LBP in facilities. Immediately report discrepancies or lack of performance to the Contracting Officer. Conduct site inspections to adequately ensure contract and regulatory compliance.
- Ensure that quality assurance inspectors are familiar with applicable LBP regulations to include Renovation, Repair, and Painting (RRP) requirements. Inspection procedures will specifically emphasize OSHA/EPA/State LBP precautions. It is recommended the Contract Management Branch obtain the “LBP Abatement Supervisors” and “EPA Lead RRP” training courses for each LBP inspector.
- Ensure waste characterizations are accomplished for LBP waste and/or OMA building components having LBP to make a disposal decision. If a Toxic Characteristic Leaching Procedure (TCLP) test fails for the lead threshold, then the waste will be characterized as a hazardous waste. In which case the waste will be manifested and turned in to DLA.
- Provide performance evaluation to MICC for future responsibility determinations. Conduct reviews of LBP abatement contracts to ensure regulatory compliance.
- Maintain a record of all events and activities relating to or affecting LBP in Fort Campbell facilities. Records would include deliverables specified in the contract scope of work, a summary of abatement actions on each contract project, and other applicable information. Communicate results of abatement actions to LBPMCO.
- Attend LBPMT meetings.

**The DPW Maintenance Division will:**

- Consider the potential for the presence of LBP during the conduct of maintenance for all installation buildings. Ensure that in-place management of LBP, to include RRP maintenance and repair operations, meets the requirements of applicable regulations listed in Appendix C of this plan.
- Ensure proper training and health monitoring of all new Maintenance Division personnel, as they become involved in the LBP Control Program. Obtain, through the DPW Environmental Division, required annual LBP awareness training for all craftsmen.
- Ensure that all employees performing LBP abatement receive a physical examination before employment, annually during employment, and at termination of employment.
- Maintain training and health monitoring records of personnel involved in LBP abatement.

- Ensure all DA procurements will utilize paint free of lead. Supply will request current Safety Data Sheets (SDSs) from paint suppliers.
- Ensure all Maintenance Division personnel encountering previously unidentified known or suspected LBP immediately report this through their immediate supervisor to the Work Management Branch.
- Submit work requests for abatement actions when noting damage that could cause LBP to be disturbed, or if LBP is peeling or flaking.
- Establish, maintain, and supervise the In-House LBP Abatement Team. The In-House Team is to accomplish emergency projects or small projects not cost effective to contract. The Team Supervisor will be the point of contact for all in-house LBP abatement responsibilities and ensure:
  - Funding is obtained for and completion of the “LBP Abatement Supervisors” training course, required refresher training, and appropriate state certification for each In-House LBP worker. Provide documentation of training and certification to the LBPMCO. Recommend the “EPA Lead RRP” course be completed by each In-House worker and that EPA and state certifications be maintained.
  - Required equipment and supplies for personnel protection and abatement operations are available.
  - Copies of OSHA Standard 29 CFR 1926.62 are maintained.
  - Proper disposal of in-house generated LBP waste. A waste characterization must be accomplished for LBP waste and/or building components having LBP. If a Toxic Characteristic Leaching Procedure (TCLP) test fails for the lead threshold, the waste will be characterized as a hazardous waste. In this case the waste will be manifested and turned in thru the Environmental Division Hazardous Waste Program Manager to the DLA.
  - Work plans are coordinated with the LBPMCO to ensure work practices specified in OSHA 29 CFR 1926.62 are adequately addressed and executed as necessary to reduce exposure below permissible exposure limits.
  - Each abatement worker and supervisor is familiar with all applicable LBP regulations. Abatement procedures for projects containing LBP will specifically emphasize OSHA/EPA/State LBP precautions.
  - Appropriate respirators and personal protective equipment, as required by OSHA 29 CFR 1926.62 and 1910.134, are used and maintained during in-house LBP abatement activities.
  - Air monitoring is performed for each abatement operation unless documented on-site historical objective data proves the work practices to be used pose no reasonable threat of LBP exposure. It is the Abatement Team’s responsibility to coordinate air monitoring.
  - In-house LBP cleanup is complete.
  - LBP records are properly maintained.
- Attend LBPMT meetings

### **The DPW Business Operations & Integration Division will:**

- Ensure LBP procedures are integrated into work reception, assignment scheduling, and estimating activities, including increased labor and job hours due to LBP/RRP abatement protocol procedures.
- Request an assessment of suspect painted surfaces or reference the LBP database to determine the presence of LBP.
- Ensure work requests, to include Self-Help, are reviewed for possible exposure to LBP or restrictions based on the EPA Lead RRP rules. If LBP is present and could cause contamination, the In-House LBP Abatement Team or LBP removal contractor will remove LBP before the performance of other work. When the lead content of a surface coating addressed in a “Work Request” is unknown, the matter is referred to the LBPMCO so testing can occur prior to surface disturbance.

### **The Fort Campbell (DPW) Housing Division:**

- Housing on Fort Campbell has been privatized. Fort Campbell Family Housing, LLC and /or its contractors are responsible for LBP survey and abatement regulatory compliance.
- Attend LBPMT meetings.

### **The Installation Medical Authority (Preventive Medicine) will:**

- Perform physical examinations for DA employees working with lead-based paint and those requiring the use of respirators before placement, annual exams, and at termination of employment IAW OSHA guidelines.
- Perform baseline and unusual blood lead and zinc prototroph level on those identified by Preventive Medicine/Industrial Hygiene staff as possibly overexposed to lead.
- Maintain health records of all employees and former employees working with LBP.
- Implement the respiratory protection program. Fit-test all In-House LBP Abatement Team members and other maintenance workers and Environmental staff as required. Make recommendations on respirator selection (brand, model and size of respirator) at time of fit testing. Teach proper use of respiratory protection. In-House LBP Abatement Team personnel will be fit-tested with the same brand and model they will actually use. Ensure personal protective equipment and clothing (including respirators) used by workers comply with 29 CFR 1910.134, 29 CFR 1926.62, and CAM Reg. 40-2.
- Program and budget available resources to accomplish LBP medical support responsibilities.

- Ensure Community Health Nursing in conjunction with Pediatric Services, Blanchfield Army Community Hospital oversee Lead Toxicity Investigations for Elevated Blood (lead) Level (EBL) cases as a member of the Risk Assessment Team.
- Develop an LBP educational pamphlet to inform all families currently living on the installation, new arrivals (including childless couples), and parents of newborns. Work with the DPW Housing Division to include the pamphlet as part of their housing information packet. Community Health Nursing will inform families or expectant parents of actual or potential lead hazards and what they can do to reduce exposures. Inform families of LBP abatement contracts in MEDDAC facilities.
- Provide updates on any active blood lead-screening programs to the LBPMT.
- Provide guidance, assistance, and recommendations to the DPW in LBP surveys, sampling, exposure control, and risk assessment. Provide expertise in compliance matters associated with LBP health-related federal, state, and local requirements.
- Perform workplace sampling and analysis as needed to identify and mitigate any LBP or any lead exposure to the workers or facility occupants.
- Perform workplace sampling and analysis, as prescribed by OSHA, where lead is used in recurring industrial operations. Inform individuals occupationally exposed to lead about the exposure and the hazard associated with that exposure. Managers of child development centers and other children-oriented facilities (built before 1978) must be aware of lead hazards. Testing may include: Air sampling to assess occupant or worker exposure and the efficiency of work methods at reducing the generation of lead in dust, bulk or wipe sampling of painted surfaces, and soil testing according to EPA requirements.
- Attend LBPMT meetings.

The Fort Campbell office of the **MISSION AND INSTALLATION CONTRACTING COMMAND (MICC)** will:

- Provide contractual support in procurement of surveying and abatement of LBP services.
- Provide adequate enforcement of LBP contracts. Make decisions on contract disputes. Ensure contractors adhere to the contract specifications.
- Ensure project planners and designers have clearly identified lead hazards to contractors in the bid documents. Project designers will determine where the hazards may exist and what steps the contractors must take to protect installation personnel and families. MICC will inform all installation contractors of the likelihood they may encounter lead-painted surfaces while conducting their work and that they must take precautions to protect their workers.
- Notify the Environmental Division of LBP abatement projects and dates abatement work begins.

- Coordinate with the Environmental Division or Contract Management Branch on any problems concerning LBP/EPA RRP Lead contracts.
- Review procurement packages and contract specifications to ensure the use of LBP is prohibited except where a specific requirement may be stipulated; i.e. bridge work.
- Retain contract documents that include LBP removal in accordance with paragraph 6.3.
- Attend LBPMT meetings.

The **DLA Disposition Services–Campbell** is responsible for disposing of non-contract generated LBP according to DoD 4160.21-M (the Defense Reutilization and Marketing Manual). DLA will attend LBPMT meetings.

The **Staff Judge Advocate (SJA)** is responsible for reviewing all activities involving LBP to ensure regulatory compliance and advice on legal conflicts. The environmental legal advisor will provide guidance for interpreting federal, state, and local laws and regulations. The legal advisor will coordinate on the following:

- Proposed installation actions for compliance with 29 and 40 CFR series requirements.
- All Plans and programs developed to meet environmental protection laws.
- Criteria, standards, performance specifications, and compliance schedules to ensure compliance with applicable laws regarding LBP.
- All requests for monitoring data by federal, state, and local environmental agencies to determine whether the data is required by applicable law or regulation.
- All inspections by federal, state, and local regulatory agencies and the results of these inspections.
- Any Notice of Violation served upon the installation for violations of federal, state, or local law.
- All known or suspected hazardous exposure to LBP.
- Attend LBPMT meetings.

The **Installation Safety Office (ISO)** will:

- Remain current on LBP abatement activities and safety precautions, procedures, and policies in Code of Federal Regulations, 29 CFR 1926.62.
- Receive and investigate LBP-related employee complaints of unsafe working conditions.
- Refer any known or suspected LBP related problem detected during safety inspections or observation to the DPW Environmental Division.
- Serve as the liaison office between Fort Campbell and the Department of Labor (OSHA) for LBP activities.
- Attend LBPMT meetings.

The **Public Affairs Office (PAO)** is responsible for interfacing with the media and general public concerning any LBP-related incident. The Public Affairs Office is responsible for disseminating information relating to LBP to Installation personnel. PAO will:

- Coordinate with the LBPMCO to develop timely and appropriate articles about the installation LBP program.
- Attend LBPMT meetings.

The **Fort Campbell School System** is responsible for compliance with 29 and 40 CFR series LBP requirements. The Fort Campbell School System will:

- Obtain annual OSHA LBP awareness training for all custodial and maintenance workers.
- Attend LBPMT meetings.

The **Directorate of Family, Moral, Welfare and Recreation (DFMWR)** is responsible for attending LBPMT meetings, to keep abreast of LBP retirements and provide input as necessary. Contracting by DFMWR should comply with the requirements of DPW/MICC as stated above.

## Chapter 3

# **LBP MANAGEMENT TEAM**

The LBP Management Team will direct development of and monitor execution of the LBP Management Plan. The primary avenue for these actions is through an annual management team meeting. The Team will direct development of Installation-specific actions to manage LBP hazards and be responsible for the following:

- Evaluating LBPMP's effectiveness through periodic meetings.
- Promoting Post awareness and education.
- Reviewing reports provided by the LBPMCO.
- Receiving updates from Preventive Medicine if a blood lead-screening program is initiated.
- Coordinating activities between organizations for the control and elimination of lead painted surfaces and products (e.g., supply, coating materials, etc.).
- Directing modification or changes to the LBPMP when necessary to improve operations or to comply with new regulatory requirements.

The LBPMCO will submit a report at the LBPMT meetings summarizing activities of the program. Meeting discussions will include ways to maintain a safe home and working environment. The Team will monitor proposed abatement work, paint testing results, noncompliance situations, and recommendations for modifications to the program.

## Chapter 4

# NOTIFICATION

### 4.1 REQUIREMENTS

Any supervisor or worker who becomes aware of the need for LBP removal or the disturbance of paint as outlined in the EPA RRP will immediately notify the DPW Business Operations & Integration Division / Work Management Branch/ Safety Officer. The Work Management Support Branch will ensure a work order or service order is accomplished to meet the LBP abatement/RRP requirements.

No military member, civilian member, or contractor shall allow LBP removal work or the disturbance of paint as outlined in the EPA RRP to begin until worker training, worker protection, and work practices are adequately addressed per federal and state regulations. For contract work, MICC will ensure compliance.

### 4.2. INFORMATION DISSEMINATION

Lead-Based Paint could potentially affect any personnel using installation facilities containing LBP. Therefore, the Installation population needs to have a good understanding of the potential LBP health hazards. A good understanding involves having accurate information, so people neither underestimate nor overestimate the health risk. The LBPMCO or other Installation LBPMT members should write articles for the installation newspaper and other information dissemination avenues. Topics may include up-dating of the LBPMP, facility surveys, and announcement of major removal projects, and warnings to personnel to avoid a controlled area where construction activities involve LBP abatement. Articles concerning worker protection will be coordinated through Preventive Medicine.

It is especially important to concentrate on families with young children and women expecting children. Preventive Medicine will ensure lead hazard awareness is available during routine well-baby visits. Information should include the hazards of lead exposure and what families can do to reduce their exposure. During pregnancy or prenatal checkups, information should include a discussion of lead hazards, including the following precautions:

- When residing in pre-1978 housing, the landlord and or contractors are performing activities that disturb paint in accordance with EPA Lead RRP requirements.
- Do not perform painting or painting preparation activities while pregnant.
- If others will be painting, the expectant mother should not be in the same room as the activity, and should not access the room until the floor and all surfaces have been wet cleaned.
- Avoid any demolition/renovation activities (or areas).
- Do not work with ceramics or pottery that can often have high lead contents.
- Eat nutritiously and follow doctor's recommendations.

Child Care Providers in Army Family Housing Units should be aware of LBP Hazards and EPA Lead RRP requirements. These homes most often meet the “Target Facility” definition LBP hazards and are subject to regulation.

## Chapter 5

# TRAINING

### 5.1 TRAINING REQUIREMENTS

Anyone responsible for managing, planning, designing, inspecting, treating, removing, or supervising the treatment or removal of LBP, as well as maintenance workers, require training. The DPW Environmental Division / LBPMCO will identify appropriate training courses for each classification of personnel participating in LBP-related work. The Environmental Division shall provide awareness training to personnel who have a role in LBP management and do not require formal EPA-approved training. It is the supervisor's responsibility to ensure personnel receive training.

### 5.2 MANAGEMENT AND ABATEMENT TRAINING

For the LBPMT to update, coordinate, and execute the LBPMP, it is necessary team members who are actively involved in the technical aspects of the plan be appropriately trained. Individuals conducting construction inspections, surveys, designs, or are associated with LBP abatement will be trained in one or more of the following subjects: 1. Building inspection 2. Risk Assessor 3. Project Designer 4. LBP Abatement Procedures and Practices for Workers and Supervisors, and EPA Lead Repair, Remodeling and Painting (EPA/RRP). Training will meet federal, state, and local training requirements. Selection and training of personnel shall be completed before anticipated projects. Table 5-1 lists required and recommended training for specific job duties. Five certification courses are specified:

- Building Inspector. Individuals conducting LBP building inspections (or surveys) must complete a 3-day course to obtain certification. Certified inspectors are permitted to conduct LBP lead-hazard inspections and collect samples.
- Risk Assessor. This certification requires a 2-day course, Building Inspector course is a prerequisite. Risk Assessors may conduct lead-hazard inspections, conduct risk assessments, and collect samples.
- Abatement Contractor/Supervisor. Supervisor training requires four days. This person may prepare abatement plans, abatement reports, and occupant protection plans for small scale lead-hazard abatement projects.
- Abatement Worker. Worker training requires two days. This person is certified to perform abatement activities. This person may not, however, supervise abatement projects.

- EPA Repair, Remodeling and Painting. This is a one-day course developed to train renovation, repair, and painting contractors how to work safely in housing with lead-based paint and comply with EPA's Renovation, Repair, and Painting (RRP) Rule, and HUD's Lead Safe Housing Rule.

EPA training requirements are **required only for target facilities (including preschools and daycare centers)**. Each certification requires bi-annual updates to keep state or EPA certifications current. States with their own LBP certification programs administer these requirements. Kentucky and Tennessee have such a program. Certifications for work in Kentucky or Tennessee will be obtained through the respective state. There is an exam and annual fee associated with each certification. Specifics about certification requirements may be obtained through the DPW Environmental Division LBPMCO.

### 5.3 TRAINING OF MAINTENANCE WORKERS

All maintenance staff must be well informed about LBP risks to achieve a successful maintenance program. Anyone who has a potential occupational exposure (based upon activities) to lead requires training. Awareness training is offered through the Environmental Division.

### 5.4 ENVIRONMENTAL QUALITY OFFICERS

Training Environmental Quality Officers (EQO) for lead-based paint awareness is an EQO course training goal. Development of protocols for the Installation is available in the Environmental Handbook, Environmental 101 "The Green Book."

**Table 5-1. Regulatory Required/Recommended Training for Fort Campbell Personnel Engaged in Lead-Based Paint Management or Abatement**

Title	Minimum Level of Training
LBP Management Control Officer	<u>Required:</u> Supervisor/contractor <u>Recommended:</u> Building inspector, risk assessor, EPA RRP Certified Renovator
Industrial Hygiene (PREVMED)	<u>Recommended:</u> Supervisor/contractor, EPA RRP Certified Renovator
Installation government LBP abatement/RRP inspectors (Contract Management Branch)	<u>Required:</u> Supervisor/contractor <u>Recommended:</u> EPA RRP Certified Renovator
LBP Inspector	<u>Required:</u> Building inspector and risk assessor
DPW Customer Support representatives who deal with LBP/RRP impacted work orders	<u>Recommended:</u> LBP Awareness Training
Safety Office representative	<u>Recommended:</u> LBP Awareness Training
Public Affairs Office representative	<u>Recommended:</u> LBP Awareness Training
Government and Contract Maintenance workers (electricians, plumbers, heating, ventilation specialists, etc.)	<u>Required:</u> LBP Awareness Training <u>Required for work in target facilities:</u> EPA RRP Certified Renovator (Supervisors), Non-Certified Worker Training
Custodial staff (Post hospital, school system, contractors)	<u>Required:</u> LBP Awareness Training
Landfill Operators	<u>Recommended:</u> LBP Awareness Training
LBP Waste Haulers	<u>Required:</u> Hazardous Materials Endorsement on Commercial Driver’s License (49 CFR 177,800 and 177.816), LBP Awareness Training <u>Recommended:</u> LBP Worker
LBP Abatement Contractors	<u>Required:</u> Supervisor/contractor and Abatement Worker (both required for work in target facilities) or LBP Awareness Training <u>Recommended:</u> Supervisor/contractor, Abatement worker (should be a contract specified requirement)
Renovation, Repair, and/or Painting Contractors Supervisors and workers in target facilities. (Pre-1978 target facilities)	<u>Required for work in target facilities:</u> EPA RRP Certified Renovator / Non-Certified Worker Training
In-House LBP Abatement Team	<u>Required:</u> Supervisor/contractor, <u>Recommended:</u> EPA RRP Certified Renovator (all required for work in target facilities)
“Self-Help” – Surface Preparation Only	<u>Required:</u> LBP Awareness Training (Also ref. Chapter 9)
Engineer Design Branch engineers	<u>Required:</u> Supervisor/contractor, EPA RRP Certified Renovator (for target facilities, otherwise recommended)
Environmental Quality Officers	<u>Required:</u> Environmental Quality Officer’s Course

## Chapter 6

# RECORDKEEPING

### 6.1 PURPOSE

The proper management of the LBP program will require generation and maintenance of records. Proper care of records will provide the documentation for compliance with Army, local, state, and federal regulations.

### 6.2 TYPES OF RECORDS

The DPW Environmental Division will maintain correspondence with state and federal regulators, inspections, and survey results.

The DPW In-House LBP Abatement Team Chief will receive and maintain one copy of the LBP Air Monitoring Report (as well as the Environmental Division) and will file these reports for all LBP work and logs.

The DPW Environmental Division will maintain individual building LBP survey/assessment records (annotated floor plans, appropriate sampling results, etc.). The Contract Management Branch must maintain all records related to contractor performance and regulatory compliance and deliverables specified in the scope of work.

The Installation Medical Authority / Preventive Medicine maintain medical surveillance records as required by Army policy.

### 6.3 RECORD RETENTION

OSHA regulation 29 CFR 1926.62, the “Construction Industry Standard for Protection of Workers from Lead,” requires the retention of records on exposure assessments, medical surveillance, and medical removal. The Army will preserve exposure-monitoring results for a minimum of 30 years after the last incident of employee exposure to LBP, and training records 1 year after employment is terminated. Contractors must also maintain records for employees who perform LBP abatement. These records shall be subject to inspection by the Contracting Officer Representative (COR) to ensure compliance with contract and regulatory requirements. All records listed here and in paragraph 6.2 must be maintained in a manner that will allow quick access.

## Chapter 7

# **QUALITY CONTROL AND QUALITY ASSURANCE**

### 7.1 QUALITY CONTROL (QC)

Implement control of work activities throughout the life of projects to meet federal and state regulatory requirements while minimizing LBP exposure to all personnel. QC activities are the responsibility of all LBPMT members. The In-House LBP Abatement Team Chief or Contract Management Branch representative is the primary QC monitor on site and will ensure LBP activities are being carried out as provided in statutory regulations.

### 7.2 QUALITY ASSURANCE (QA)

The QA program is to ensure quality will be visible at all organizational levels and QA will receive management attention. Everyone involved in the management of LBP has a distinct role in the QA program.

## Chapter 8

# INSTALLATION ASSESSMENT

### 8.1 PURPOSE

One objective of Army Regulation 200-1 is to control Lead-Based Paint. The primary objective of the LBPMP is to perform installation-wide surveys of all structures built prior to 2003, with emphasis on pre-1978 buildings, to establish and maintain an inventory of known LBP. This effort minimizes the potential for environmental release as well as occupational and incidental exposure.

Surveys will be performed through the DPW Environmental Division (Environmental project number 0-64-10S), by accredited personnel. The intent is to identify the existence, extent and condition of known LBP and provide a risk assessment for each location. Appendix D shows the LBP survey status of installation Operations & Maintenance Army (OMA) buildings.

### 8.2 Installation Assessment will include the following:

A review of maintenance schedules, design plans, and specifications to identify structures scheduled for repair, alteration, or demolition. This will aid in assessment prioritizing.

Conduct assessments using trained LBP Inspectors meeting federal and state requirements. Assessments and re-assessments are for each occurrence of LBP which has the potential for environmental release and an associated risk to human health. Notification to facility occupants will include any LBP related health hazard identified in their work environment.

The DPW Business Operations & Integration Division / Work Management Branch will coordinate requests for assessments and, should the request include a suspected health hazard, forward the request to the Preventive Medicine Service in addition to the Environmental Division.

## Chapter 9

# INSTALLATION ABATEMENT PLAN

### 9.1 PURPOSE

The Installation will remove LBP to minimize environmental release and occupational exposure, as required for maintenance, repair, renovation, painting and demolition projects. Immediate corrective action will occur where a possible LBP related health hazard has been identified. Where no LBP health or environmental hazard has been established, the Army's policy (AR 200-1) is to manage in-place.

### 9.2 Abatement Response Based Upon Lead Levels in Paint:

OSHA states in their interpretation letter, subject: "Using X-ray fluorescence for analysis of lead in paint and applicability of other agencies lead levels," dated March 1, 1999 and attached at Appendix E, that the lead in construction standard, 29 CFR 1926.62, was intended to apply to any detectable concentration of lead in paint. The idea is that even small concentrations of lead may result in worker exposures depending upon the work practices used. This section contains guidance on how to interpret what is required per EPA and OSHA for abatement response actions in response to and as a result of the paint's lead concentration and abatement activities.

LBP abatement response actions may be required based upon the "LBP hazard" (lead levels in paint, dust, or soil; the condition of the paint or painted surface; or upon a risk assessment). "Self-Help" work, especially, needs to be scrutinized to ensure workers are protected.

When the paint sampling indicates:

- **No Detectable Levels of Lead:** No special work practice (worker protection measure) or training is required.
- **Detectable Levels of Lead, but less than 5000 ppm (or less than 1.0 mg/cm<sup>2</sup> when using the x-ray fluorescence analyzer):** OSHA may require special work practices. Appendix F is a protocol for Lead-Containing Paint (LCP) surface preparation. This protocol

and its specific work practices are not blanket guidelines. The DPW Environmental Division must approve variations to the use of this protocol. Follow on assessments and protocols (similar to this one) are needed. The Environmental Division should be consulted for any undated assessment or protocol information.

- **5000 ppm (or in excess of 1.0 mg/cm<sup>2</sup> when using the x-ray fluorescence analyzer):** As defined in 40 CFR 745, this level delineates a LBP and is also HUD's action level. It is used as the trigger for abatement, although it does not define when abatement must be conducted. No Self-Help work will be authorized for this level.

EPA regulations and HUD guidelines (both training and work practices) are not required unless the paint is a LBP by their definition of 5000 ppm. EPA and HUD regulations apply only to target facilities. Conversely, if 5000 ppm or above, EPA regulations shall be followed and designers shall specify HUD guidelines (State of the Art) in abatement contracts regardless of an exposure assessment or whether in target housing or not.

In accordance with 29 CFR 1926.62, an exposure assessment may be accomplished to satisfy OSHA requirements when lead concentrations are 5000 ppm or above. Exposures above the PEL should remain to be an initial assumption. This will establish that OSHA required work practices, worker protection measures, training, and medical surveillance, are required. The designer should specify this information as requirements in the contract. Initially the task triggers for respiratory protection listed in 29 CFR 1926.62 shall be used, and later based upon air monitoring during abatement operations.

OSHA requirements are applicable to all response actions. The EPA and HUD requirements only apply to target facilities. As a best management practice and to establish a "state of the art" standard, Fort Campbell will utilize OSHA, EPA, and HUD requirements and guidelines for all Installation abatements.

### 9.3 ABATEMENT PROJECTS

Work-orders must be submitted for all construction, including self-help projects. Work-orders must be reviewed to determine whether there is a potential LBP impact.

In cases where the lead hazard is undetermined in OMA buildings, the Environmental Division will be contacted to evaluate the hazard.

## 9.4 Renovation, Repair and Painting (RRP) Plan Reformatted from Chapter 10.

The purpose of the RRP Plan is to address the EPA/HUD Lead Renovation Repair and Painting Rule (40 CFR Part 745, April 22, 2008) and its application to OMA buildings on Fort Campbell.

Given the minimal relevance of pre-1978 OMA buildings to the EPA/HUD Lead Renovation Repair and Painting Rule, the requirement that all undetermined LBP hazards are to be referred to the Environmental Division for evaluation (Chapter 9), and the added requirement that LBP hazards will be abated as required to meet renovation, repair, and painting requirements, the EPA/HUD Lead Renovation Repair and Painting Rule is incidental. It is the policy of Fort Campbell to abate lead-based paint in all areas before disturbing such areas in renovation, repair, and painting activities. Options to the contrary shall require total compliance with the EPA Lead RRP rules and shall not constitute abatement.

All renovation, repair and painting activities in pre-1978 schools, to include associated child care facilities and/or child occupied facilities, shall be performed in compliance with the EPA/HUD Lead Renovation Repair and Painting Rule.

APPENDIX A

HSHB-ME-SH (40)

MEMORANDUM FOR Commander, U.S. Army Environmental Center, ATTN:  
SFIM-AEC-EC, Bldg E4435, Aberdeen Proving Ground,  
MD 21010-5401

SUBJECT: Interim Final Report, Lead-Based Paint Contaminated  
Debris - Waste Characterization Study No. 37-26-JK44-92, May 1992  
- May 1993

Three copies of this report are enclosed. Questions regarding  
this report may be directed to Ms. Veronique Hauschild or Mr.  
John Resta, Chief, Hazardous and Medical Waste Branch.  
Additional comments or concerns may be directed to me. We can be  
contacted at DSN 584-3652 or commercial (410) 671-3652.

FOR THE COMMANDER:

Encl

JESSIE B. CABELLON  
LTC, MS  
Chief, Waste Disposal Engineering  
Division

CF (w/encl):  
HQDA (ENVR-E)  
DA, USAEHSC, ATTN: CEHSC-FU-S  
CDR, HSC, ATTN: HSCL-P  
CDR, USAEC, ATTN: SFIM-AEC-TSS  
CDR, USAEC, ATTN: SFIM-AEC-RM (2 cy)  
CDR, USAEHA-W  
CDR, USAEHA-S  
CDR, USAEHA-N  
CDR, AMC, ATTN: AMCSG  
CDR, FORSCOM, ATTN: FCEN-CED-E  
CDR, TRADOC, ATTN: ATBO-L

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Environmental Health Excellence

INTERIM FINAL REPORT  
LEAD-BASED PAINT CONTAMINATED DEBRIS  
WASTE CHARACTERIZATION STUDY NO. 37-26-JK44-92  
MAY 1992 - MAY 1993

Distribution limited to U.S. Government agencies only; protection of privileged information evaluating another command; Jul 93. Requests for this document must be referred to Commander, U.S. Army Environmental Center, ATTN: SFIM-AEC-EC, Bldg E4435, Aberdeen Proving Ground, MD 21010-5401.

EXECUTIVE SUMMARY  
INTERIM FINAL REPORT  
LEAD-BASED PAINT CONTAMINATED DEBRIS  
WASTE CHARACTERIZATION STUDY NO. 27-26-JK44-92  
MAY 1992 - MAY 1993

1. PURPOSE. This study was performed to assess the waste characteristics of debris that is contaminated with lead-based paint (LBP). The study focused on the debris generated from the demolition of Army WWII structures but also addresses other waste items such as those resulting from abatement and renovation activities.

2. CONCLUSIONS.

a. Characterization: Whole-Building Demolition Debris. The findings showed that (statistically) whole-building demolition debris (e.g., Army WWII-era structures) can be characterized as nonhazardous waste so long as certain assumptions/assertions are made:

(1) Other hazardous components such as asbestos or PCBs (from light ballasts and roofing tars) are not present/or are removed and disposed separately.

(2) Metals components such as ductwork, furnace/boilers, piping, or siding are removed to the extent feasible as scrap materials for reuse/recycling.

(3) All remaining material (i.e., all those materials that were included in the sampling process such as both painted and unpainted wood components, brick, concrete/foundation material) must comprise a single wastestream at the point of generation (when the building is demolished). This wastestream must be handled as a single, discrete wastestream and disposed of all together.

b. Characterization: Small-Scale Debris. Debris that is generated during renovation, maintenance, or abatement activities such as paint chips, blast grit/media, or personal protective equipment is more likely to be characterized

as "hazardous" due to the concentrated mass of LBP. For these types of wastes, hazardous waste generation can be minimized through waste segregation techniques. For some wastes, cost savings can be achieved through minimizing sampling and analyses.

c. Disposal.

(1) Nonhazardous Waste. While disposal in a construction/demolition (C/D) debris landfill may be appropriate and relatively inexpensive at this time, generators should consider other options that offer more than an "out-of-sight, out-of-mind" solution. In fact, new/impending restrictions on C/D debris landfills may force the cost of this disposal option to greatly increase. Other options may be less expensive and/or more environmentally acceptable. State and/or local regulatory involvement will be necessary when assessing the feasibility of such alternatives.

(2) Hazardous Waste. The volume of LBP-related hazardous waste should be minimized to the extent most feasibly and economically possible. This can be done through careful assessment of operations and segregation of wastestreams as well as separation of contaminated items or removal of LBP.

(3) Recycling. Many items such as metal duct work, piping, and siding can be salvaged from buildings that are to be demolished for recycling/reuse. Recycling can provide economic gains in addition to the environmental benefits associated with a reduced wastestream.

3. RECOMMENDATIONS.

a. Identify whole-building demolition debris wastestream populations that meet the descriptions discussed in this report.

b. Characterize such waste as nonhazardous, pending concurrence from state and local agencies.

c. Identify other sources of lead-paint containing waste and debris. Determine appropriate waste segregation and management procedures based on cost-analyses and findings discussed above.

d. Evaluate the potential for environmental media (e.g., soil) contamination at demolition sites, specifically with regards to future-use scenarios and human health-risk.

e. Develop SOPs for demolition site operations to minimize environmental contamination and health hazards.

f. Assess current disposal procedures for demolition debris. Correct deficiencies/make amendments to contracts and/or SOPs with regard to final destination, liabilities, and control.

g. Evaluate disposal options and alternatives with regards to environmental and other regulatory requirements, cost, and other benefits/disadvantages.

**MEMORANDUM FOR SEE DISTRIBUTION**

**SUBJECT: Army Guidance Regarding Disposal of Lead-Based Paint (LBP) Wastes Generated at Military Residences**

**1. References:**

a. Memorandum, EPA, Office of Solid Waste and Emergency Response, 31 Jul 00, subject: Regulatory Status of Waste Generated by Contractors and Residents from Lead-Based Paint Activities Conducted in Households (encl 1).

b. Memorandum, EPA, Office of General Counsel, 7 Mar 95, subject: Applicability of the Household Waste Exclusion to Lead-Contaminated Soil (encl 2).

c. Interim Final Report, U.S. Army Environmental Hygiene Agency, HSHP-ME-SH, May 1992 - May 1993, 3 Aug 93, subject: Interim Final Report, Lead-Based Paint Contaminated Debris - Waste Characterization Study No. 37-26-JK44-92.

2. The purpose of this memorandum is to update Army guidance based on the 31 Jul 00 memorandum issued by the U.S. Environmental Protection Agency (EPA) which clarified Resource Conservation and Recovery Act (RCRA) regulation of the disposal of wastes generated from LBP activities at residences ("LBP wastes"). See enclosure 1 or visit the website <http://www.epa.gov/lead/fslbp.htm>.

3. Where consistent with state requirements, Commanders shall dispose of LBP wastes generated at residences by Army personnel or contractors as a non-hazardous waste under the RCRA household waste exclusion. This policy guidance will be included in the next revision of AR 200-1, Environmental Management.

4. The EPA memorandum clarifies that LBP wastes generated through LBP abatement, renovation, remodeling or rehabilitation of residences is considered "household waste" under 40 CFR 261.4(b)(1), and is thus excluded from the universe of RCRA regulated hazardous wastes. Examples of Army buildings that fall within the RCRA definition of

**SUBJECT: Army Guidance Regarding Disposal of Lead-Based Paint (LBP) Wastes Generated at Military Residences**

households include BOQs, family housing, apartment buildings, guest housing, and military barracks. The memorandum emphasizes that the household exclusion applies to waste generated by either residents or contractors conducting LBP activities in residences. The exclusion does not apply to LBP wastes generated from buildings or locations other than residences, or to the non-residential portions of combined function buildings.

5. The memorandum points out that states may have more stringent regulations for LBP waste disposal. Installations should check with their environmental law specialist, and their state regulator, before disposing of LBP wastes under the RCRA household waste exclusion. If the household waste exclusion does not apply, the LBP waste may be subject to RCRA's hazardous waste regulations.

6. Installations should note that the EPA does not consider the household waste exclusion to include LBP debris or wastes from building demolition. See 49 Federal Regulation 44978 (13 Nov 84). The LBP wastes from building demolition debris, however, may be able to be disposed of as non-hazardous waste based on the generator's knowledge that the building as a whole is not hazardous, as revealed through Toxicity Characteristic Leaching Procedure testing (ref 1c). The EPA has proposed regulating certain LBP debris wastes under the Toxic Substances Control Act, but the EPA's LBP debris rule has not yet been finalized.

7. Installations should note that LBP wastes falling under the RCRA household waste exclusion should be disposed of in a municipal solid waste landfill. Disposal of LBP wastes under the household waste exclusion in a solid waste incinerator is also allowed.

8. Although not stated in the EPA memorandum, the household waste exclusion can be applied to lead in soil removed from the area around a residence. This fact is discussed in an earlier, 7 Mar 95, EPA memorandum (encl 2), that is referenced in the 31 Jul 00 EPA memorandum. The EPA states on page two of the 1995 memorandum: "If the source of the lead contamination was a result of either routine residential maintenance or the weathering or chalking of lead-based paint from the residence, the lead-contaminated soil in residential yards would be part of the household waste stream as defined in the household waste exclusion of 40 CFR § 261.4(b)(1), even if the soil exhibits the characteristic of toxicity under 40 CFR § 261.24. Under these circumstances, the soil would not be subject to the hazardous waste regulations under RCRA Subtitle C and may be . . . disposed of off-site in accordance with applicable RCRA Subtitle D regulations and/or state law."

**SUBJECT: Army Guidance Regarding Disposal of Lead-Based Paint (LBP) Wastes  
Generated at Military Residences**

9. Installations should also be aware that Department of Transportation (DOT) regulations governing hazardous materials may apply, even if the LBP waste is not regulated as hazardous waste. For example, concentrated LBP waste removed with chemical strippers may be classified as a DOT hazardous material. The Material Safety Data Sheet or the containers which hold the strippers should provide the DOT classification.

10. The U.S. Army Environmental Center point of contact for this matter is Mr. Michael Worsham, 410-436-7076. The Office of the Director of Environmental Programs point of contact is Mr. Douglas Warnock, 703-693-0549.

/s/

2 Encls  
as

STACEY K. HIRATA  
Colonel, GS  
Director, Environmental Programs

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(CONT)

# APPENDIX C

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# APPENDIX F

## **PROTOCOL FOR LEAD CONTAINING PAINT (LCP) SURFACE PREPARATION**

### Definitions:

**Lead Based Paint (LBP)** - Paint that has a lead content of 5000 ppm or greater.

**Lead Containing Paint (LCP)** - Paint that has a detectable lead content of 4999 ppm or less.

This limited protocol is **for Lead Containing Paint (LCP) with a lead content of 4999 ppm or less**. It is intended to minimize the potential for exposure to lead in paint.

Under no circumstances shall this protocol be extended to encompass surface work on Lead-Based Paint. Only EPA and state certified LBP workers may perform work on LBP. The DPW Environmental Division should be consulted for any protocol information or paint lead content determinations.

### AVOID – PROTECT – CLEAN UP

**AVOID** creating or spreading dust with lead content.

**PROTECT** yourself by practicing good personal hygiene.

**CLEAN UP** the work area prior to starting the job and upon completion of the job.

### TOOLS REQUIRED

Spray Bottle  
Putty (scraping) Knife  
Polyethylene Sheeting  
Duct Tape/Masking Tape  
30 Gallon, Opaque Polyethylene Trash Bags W/Ties  
Surfactant (mixture of water & non-foaming soap, approximately 2:1)

## DIRECTIONS

**When paint has been identified as Lead-Containing (LCP) but NOT Lead-Based LBP:**

- Utilize polyethylene drop clothes to cover the ground completely in the immediate vicinity of the work area.
- Start surface preparation at the highest point.
- Utilizing the spray bottle filled with surfactant (see tools required), mist an area to be scraped.
- Utilizing the paint scraping tool / removal tool, scrape and remove flaking paint. It is not necessary to remove all paint or to remove paint down to the original surface.
- Upon completion; clean-up the area, fold all lead-containing paint residue, surfactant and other debris into the polyethylene drop cloth and place it in opaque trash bags, securing it in a “Goose Neck<sup>\*</sup>” manner with duct tape.
- Place that bag inside of another, securing the second bag in the same manner.
- All project trash bags may be deposited in an applicable dumpster.
- Thoroughly wash and bathe yourself and all clothes worn for the project.

\*\*\*\*\*      \*\*\*\*\*

*Note: This protocol calls for work practices that exceed the minimum requirements as set forth by applicable directives. Strict adherence to these work practices is paramount for proper health and safety considerations.*

\*Twist the top of the trash bag, fold it over and tape securely.

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

Updated 05 November 2014

	A	B	C	D	E	F	G
1	<b>BUILDING NUMBER</b>	<b>STATE</b>	<b>SQUARE FOOTAGE</b>	<b>YEAR BUILT</b>	<b>REMARKS</b>	<b>DATE OF INSPECTION</b>	<b>LBP / LCP</b>
2	'00032	T	2720	1950		2011	LBP
3	'00038	T	16038	1967	Library	2011	LBP
4	'00039	T	14523	1942		2003	LBP
5	'00043	T	7780	1983		2009	LCP
6	'00080	K	28580	1991	Youth Center		
7	'00082	K	4500	1997		2009	LCP
8	'00088	T	8240	1999	Credit Union	2009	LCP
9	'00089	T	14545	1975	Arts & Crafts	2014	LBP
10	'00091	K	12873	1972	Post Office	2014	LBP
11	'00092	K	3074	1960		2011	LBP
12	'00093	T	17492	1949	Wilson Theater	2014	LBP
13	0094A	K	288	1958		2012	LBP
14	0094B	K	823	1958		2012	LBP
15	0094C	K	1496	1958		2012	LBP
16	0094D	K	823	1958		2012	LBP
17	'00095	K	21864	1954		2006	LBP
18	'00096	T	6059	1957		2014	LBP
19	0096A	T	2000	1994		2014	LCP
20	0097A	K	1084	1958		2012	LBP
21	0097B	K	1083	1958		2012	LBP
22	0097C	K	1083	1958		2012	LBP
23	0098A	K	20000	1958		2013	LBP
24	0098B	K	20000	1958		2013	LBP
25	0098C	K	20000	1958		2013	LBP
26	0098D	K	42645	1958		2013	LBP
27	0099A	K	1250	1958		2012	LBP
28	0099B	K	1250	1958		2012	LCP
29	0099C	K	1250	1958		2012	LBP
30	0099D	K	1486	1958		2012	LBP
31	'00100	K	800	1985		2009	LCP
32	'00123	K	18864	1943		2006	LBP
33	'00125	K	18864	1943		2006	LBP
34	'00127	K	18864	1943		2006	LBP
35	'00201	K	3843	2001		2014	LCP
36	'00202	K	124712	1997	Ed Center		
37	'00234	T	8042	1942		2013	LBP
38	'00602	T	3108	1943		2011	LBP
39	'00603	T	3108	1943		2013	LBP
40	'00604	T	3171	1943		2011	LBP
41	'00605	T	3171	1943		2011	LBP
42	'00606	T	3972	1943		2013	LBP
43	'00650	T	455469	1982	Hospital - as required/requested		LBP
44	'00723	T	5310	1942		2013	LBP
45	'00734	T	5310	1942		2006	LBP
46	'00744	T	9000	1982		2013	LBP
47	'00749	T	3108	1943		2012	LBP
48	'00750	T	3108	1943		2012	LBP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
49	'00751	T	18240	1943		2012	<b>LBP</b>
50	'00752	T	18299	1943		2012	<b>LBP</b>
51	'00754	T	18299	1943		2012	<b>LBP</b>
52	'00755	T	18299	1943		2012	<b>LBP</b>
53	'00756	T	18299	1943		2012	<b>LBP</b>
54	'00757	T	3108	1943		2011	<b>LBP</b>
55	'00762	T	9000	1984		2009	No
56	'00763	T	3055	1997		2009	No
57	'00832	T	13048	1942		2013	<b>LBP</b>
58	'00840	T	9000	1942		2012	<b>LBP</b>
59	'00842	T	9000	1942		2012	<b>LBP</b>
60	'00844	T	9000	1942		2012	LCP
61	'00846	T	9000	1942		2012	<b>LBP</b>
62	'00847	T	10655	1942		2013	<b>LBP</b>
63	'00849	T	10050	1942		2013	<b>LBP</b>
64	'00850	T	10452	1942		2010	<b>LBP</b>
65	'00860	T	55558	1942	Laundry	2012	<b>LBP</b>
66	'00862	T	9000	1942		2012	LCP
67	'00863	T	11039	1942		2012	<b>LBP</b>
68	'00864	T	300	1970		2011	<b>LBP</b>
69	'00865	T	10691	1942		2014	<b>LBP</b>
70	'00867	T	10668	1942		2013	<b>LBP</b>
71	'00868	T	13104	1942		2013	<b>LBP</b>
72	'00869	T	3076	1942		2012	<b>LBP</b>
73	'00871	T	6901	1942		2011	<b>LBP</b>
74	'00873	T	6808	1942		2012	<b>LBP</b>
75	'00875	T	4061	1942		2012	<b>LBP</b>
76	'00877	T	3578	1949		2012	<b>LBP</b>
77	'00882	T	600	1955		2014	LCP
78	00885	T	500	1957		2011	<b>LBP</b>
79	'00886	T	240	1957		2012	LCP
80	'00887	T	3120	1966		2014	LCP
81	'00888	T	1920	1984		2011	LCP
82	'00889	T	1920	1984		2014	LCP
83	'00890	T	4480	1984		2011	LCP
84	'00892	T	12078	1986		2014	<b>LBP</b>
85	'00893	T	4000	1986		2012	LCP
86	'00901	T	120	1979	Insp. Exception basis only		
87	'00907	T	9000	1942		2011	<b>LBP</b>
88	'00908	T	9000	1942		2012	<b>LBP</b>
89	'00909	T	9000	1942	Storage Bldg.	2008	<b>LBP</b>
90	'00923	T	Unknown	Unknown	Comcast Bldg	2008	LCP
91	'01110	T	8225	1992		2014	LCP
92	'01501	T	32643	1963		2013	<b>LBP</b>
93	'01565	T	340	1957	Pump House	2005	LCP
94	'01568	T	1632	1964	Storage Bldg.	2012	<b>LBP</b>
95	'01569	T	2800	1985		2012	LCP
96	'01572	T	1440	1980		2009	No
97	'01581	T	3484	1975		2003	LCP
98	'01582	T	8996	1975		2006	LCP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
99	'01583	T	8996	1975		2003	LCP
100	'01584	T	9195	1975		2009	LCP
101	'01585	T	6029	1975		2003	LCP
102	'01603	T	2100	1975	Storage Bldg.	2012	LCP
103	'01604	T	126	1970		2012	LCP
104	'01608	T	168	1990		2009	LCP
105	'01746	T	10276	1942		1996	LBP
106	'02110	T	2000	1942		2011	LBP
107	'02112	T	3500	1967		2011	LBP
108	'02114	T	3500	1967		2011	LBP
109	'02129	T	2800	1977	Shopette	2011	LBP
110	'02159	T	2570	1943		2012	LBP
111	'02172	T	5310	1942		2011	LBP
112	'02174	T	5310	1942		2013	LBP
113	'02176	T	5310	1942		2013	LBP
114	'02182	T	5310	1942		2006	LBP
115	'02186	T	5310	1942		2012	LBP
116	'02188	T	5310	1942		2006	LCP
117	'02191	T	9352	1948		2011	LCP
118	'02192	T	1877	1948		2011	LCP
119	'02193	T	950	1952		2011	LCP
120	'02203	T	1750	1943		2011	LBP
121	'02204	T	2260	1942		2011	LBP
122	'02205	T	1263	1942		2011	LBP
123	'02206	T	1250	1942		2011	LBP
124	'02250	T	2500	1943		2002	LBP
125	'02251	T	2625	1943		2012	LBP
126	'02253	T	2338	1942		2012	LBP
127	'02255	T	5310	1942		2012	LBP
128	'02257	T	5310	1942		2012	LBP
129	'02259	T	3075	1943		2012	LBP
130	'02261	T	4000	1993		2013	LCP
131	'02267	T	2995	1943		2012	LBP
132	'02269	T	2427	1942		2012	LBP
133	'02270	T	18124	1949	Estep Gym	2011	LBP
134	'02301	T	3663	1942		2011	LBP
135	'02303	T	3746	1942		2011	LBP
136	'02304	T	3500	1967		2011	LBP
137	'02312	T	5310	1942		2012	LBP
138	'02314	T	5310	1942		2012	LBP
139	'02316	T	5310	1942		2012	LBP
140	'02318	T	5310	1942		2012	LBP
141	'02320	T	5310	1942		2012	LBP
142	'02322	T	5310	1942		2012	LBP
143	'02324	T	5310	1942		2012	LBP
144	'02326	T	5310	1942		2012	LBP
145	'02435	T	3500	1967		2011	LCP
146	'02437	T	4800	1994		2013	LCP
147	'02439	T	4800	1994		2013	LCP
148	'02441	T	4800	1994		2013	LCP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
149	'02506	T	6490	1943		2002	<b>LBP</b>
150	'02515	T	5310	1942		2012	<b>LBP</b>
151	'02525	T	4800	1994		2008	LCP
152	'02530	T	2500	1943		2011	<b>LBP</b>
153	'02570	T	1364	1944		2014	<b>LBP</b>
154	'02571	T	1152	1944		2008	<b>LBP</b>
155	'02575	T	8667	1954		2012	<b>LBP</b>
156	'02601	T	31386	1971		2002	<b>LBP</b>
157	'02604	T	22810	1942		2013	<b>LBP</b>
158	'02607	T	3721	1942		2012	<b>LBP</b>
159	'02699	T	3319	1972		2012	<b>LBP</b>
160	'02702	K	104978	1976		2003	<b>LBP</b>
161	'02703	K	6011	1986		2014	LCP
162	'02705	K	3380	2002		2013	LCP
163	'02745	K	13249	1983	CID	2008	LCP
164	'02762	K	1200	1989		2014	LCP
165	'02840	K	387338	1993			No
166	'02902	K	7531	1942		2011	<b>LBP</b>
167	'02906	K	3000	1993		2014	LCP
168	'02912	K	4170	1967	Demo'd	2014	<b>LBP</b>
169	'02950	K	3783	1942		2011	<b>LBP</b>
170	'02994	K	12551	1954		2009	<b>LBP</b>
171	'02995	K	12551	1954		2004	<b>LBP</b>
172	'02996	K	12551	1954		2004	<b>LBP</b>
173	'02997	K	12551	1954		2002	<b>LBP</b>
174	'03000	K	5952	1976	Shopette	2012	LCP
175	'03001	K	6621	1993		2011	LCP
176	'03068	K	5000	1988	Child Occupied	2008	No
177	'03069	K	23765	1993	Child Occupied	2007	LCP
178	'03071	K	23765	1993	Child Occupied	2009	LCP
179	'03101	K	3746	1942		2011	<b>LBP</b>
180	'03109	K	4828	1942		2003	<b>LBP</b>
181	'03112	K	3500	1967		2011	<b>LBP</b>
182	'03211	K	39722	1952		2003	<b>LBP</b>
183	'03212	K	39722	1952		2002	<b>LBP</b>
184	'03213	K	42627	1952		2002	<b>LBP</b>
185	'03214	K	42627	1952		2003	<b>LBP</b>
186	'03215	K	39809	1952		2002	<b>LBP</b>
187	'03303	K	995	1992	North Sports Complex	2009	LCP
188	'03304	K	3500	1967		2011	<b>LBP</b>
189	'03305	K	3500	1967		2011	LCP
190	'03411	K	20918	1966	SKIES	2013	<b>LBP</b>
191	'03603	K	14606	1979		2007	LCP
192	'03610	K	20618	1978		2011	LCP
193	'03672	K	25241	1986	HQ Bldg.		
194	'03680	K	15228	1983	HQ Bldg. 4-sections		
195	'03686	K	15228	1983		2013	<b>LBP</b>
196	'03707	K	1035	1984		2013	LCP
197	'03713	K	44156	1982		2005	<b>LBP</b>
198	'03717	K	13895	1982		2012	No

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
199	'03721	K	6673	1983		2011	LCP
200	'03725	K	44156	1982		2005	<b>LBP</b>
201	'03730	K	33104	1983		2005	<b>LBP</b>
202	'03731	K	33275	1982		2005	<b>LBP</b>
203	'03748	K	33104	1977		2002	<b>LBP</b>
204	'03750	K	33104	1978		2002	<b>LBP</b>
205	'03754	K	33284	1978		2005	LCP
206	'03755	K	15228	1983	HQ Bldg.		
207	'03759	K	15228	1983	HQ Bldg.		
208	'03763	K	11856	1977		2006	LCP
209	'03765	K	15228	1983		2012	LCP
210	'03766	K	44106	1977		2002	LCP
211	'03767	K	20234	1977		2006	<b>LBP</b>
212	'03780	K	9855	1979		2011	LCP
213	'03902	K	13045	1977	Steam Plant	2013	<b>LBP</b>
214	'03910	K	16264	1984		2013	LCP
215	'03932	K	20618	1978		2011	LCP
216	'03934	K	11200	1991		2011	LCP
217	'03958	K	5786	1977		2013	LCP
218	'03962	K	9855	1979		2011	LCP
219	'03968	K	3560	1977		2012	LCP
220	'04013	K	15228	1977		2013	<b>LBP</b>
221	'04017	K	15228	1977		2013	<b>LBP</b>
222	'04021	K	11856	1977		2013	LCP
223	'04024	K	33104	1977		2005	<b>LBP</b>
224	'04025	K	12375	1977		2013	LCP
225	'04028	K	33104	1977		2005	<b>LBP</b>
226	'04029	K	20234	1977		2003	<b>LBP</b>
227	'04033	K	33104	1977		2005	<b>LBP</b>
228	'04038	K	44156	1977		2005	<b>LBP</b>
229	'04039	K	33104	1977		2005	<b>LBP</b>
230	'04044	K	33104	1977		2005	<b>LBP</b>
231	'04053	K	22053	1977		2002	LCP
232	'04054	K	25241	1977		2003	<b>LBP</b>
233	'04057	K	33104	1977		2003	LCP
234	'04061	K	16150	1977	DFAC	1998	
235	'04062	K	15228	1977		2006	<b>LBP</b>
236	'04067	K	44106	1977		2005	<b>LBP</b>
237	'04068	K	15228	1977		2003	<b>LBP</b>
238	'04190	K	6153	1985	Shopette	2009	LCP
239	'04199	K	9520	1960		2013	<b>LBP</b>
240	'05004	K	1687	1991		2006	LCP
241	'05115	T	2945	1943		2011	<b>LBP</b>
242	'05121	T	1800	1990		2014	LCP
243	'05123	T	8208	1943		2011	<b>LBP</b>
244	'05124	T	9000	1984		2008	LCP
245	'05125	T	8208	1943		2011	<b>LBP</b>
246	'05127	T	224	1942		2014	<b>LBP</b>
247	'05128	T	2921	1986		2008	No
248	'05129	T	800	1989		2009	LCP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
249	'05130	T	1999	1997		2008	LCP
250	'05131	T	1945	1997		2008	LCP
251	'05132	T	96	1996		2008	No
252	'05133	T	7000	1998		2008	LCP
253	'05134	T	7000	1999		2008	LCP
254	'05135	T	7000	2001		2008	LCP
255	'05160	T	2924	1987		2008	No
256	'05161	T	2464	1989		2008	LCP
257	'05201	T	10400	1963		2011	LCP
258	'05202	T	29300	1964		2013	<b>LBP</b>
259	'05207	T	169375	1954	Warehouse	2014	<b>LBP</b>
260	'05209	T	4840	1998		2008	LCP
261	'05210	T	86708	1954	Warehouse	2014	<b>LBP</b>
262	'05211	T	185	1969		2013	LCP
263	'05212	T	2160	1989		2013	LCP
264	'05213	T	10000	1967	Warehouse	2013	LCP
265	'05214	T	25920	1968	Warehouse	2014	<b>LBP</b>
266	'05216	T	30000	1991		2013	LCP
267	'05217	T	1020	1990		2013	No
268	'05220	T	3200	2001		2009	LCP
269	'05221	T	5250	1996		2009	LCP
270	'05222	T	7500	1999		2009	LCP
271	'05223	T	9000	1984		2009	LCP
272	'05224	T	5105	1997		2009	LCP
273	'05225	T	3200	1990		2009	LCP
274	'05226	T	5106	1997		2009	No
275	'05287	T	600	1995		2014	LCP
276	'05289	T	4800	1995		2014	<b>LBP</b>
277	'05290	T	2290	1981		2009	LCP
278	'05291	T	1161	1986		2009	LCP
279	'05380	T	26460	1989		2013	LCP
280	'05504	T	4046	1994		2010	LCP
281	'05505	T	99270	1994	Motor Pool		
282	'05506	T	120	1994		2013	LCP
283	'05507	T	120	1994		2013	LCP
284	'05508	T	18993	1994	Motor Pool	2008	LCP
285	'05509	T	494	1994		2010	LCP
286	'05510	T	3500	1994		2011	LCP
287	'05513	T	10241	1943		2013	<b>LBP</b>
288	'05514	T	995	1992	South Sports Complex	2009	LCP
289	'05580	T	14606	1977		2003	<b>LBP</b>
290	'05611	T	9770	1943		2013	<b>LBP</b>
291	'05613	T	10496	1943		2013	<b>LBP</b>
292	'05640	T	7036	1997		2009	LCP
293	'05641	T	7036	1997		2009	LCP
294	'05646	T	7036	1997		2008	LCP
295	'05658	T	17630	1986	Gear to Go	2008	LCP
296	'05660	T	3435	1966		2014	<b>LBP</b>
297	'05661	T	22480	1970		2014	<b>LBP</b>
298	'05663	T	12204	1962		2014	LCP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
299	'05665	T	800	1982		2013	LCP
300	'05667	T	3200	1999		2008	No
301	'05668	T	8064	1975		2014	LCP
302	'05702	T	14000	1968		2011	<b>LBP</b>
303	'05705	T	7519	2001		2009	LCP
304	'05710	T	2200	1985		2013	<b>LBP</b>
305	'05733	T	7700	1985		2008	LCP
306	'05740	T	14173	1959		2014	<b>LBP</b>
307	'05860	K	5000	1994		2008	LCP
308	'05875	T	1248	1970		2011	<b>LBP</b>
309	'05978	K	761	2000		2009	LCP
310	'05979	K	74360	2000	Dental Clinic		
311	'05980	K	12133	1963		2014	<b>LBP</b>
312	'06002	T	400	1989		2009	LCP
313	'06078	T	1800	1998		2013	No
314	'06080	T	7650	1968		2011	<b>LBP</b>
315	'06081	T	4853	1945		2012	<b>LBP</b>
316	'06082	T	1139	1986		2013	<b>LBP</b>
317	'06085	T	1804	2002		2013	LCP
318	'06087	T	10816	1977		2013	<b>LBP</b>
319	'06088	T	4988	1980		2008	LCP
320	'06090	K	7538	1994		2012	<b>LBP</b>
321	'06091	T	324	1969		2011	LCP
322	'06093	T	2064	1996		2010	No
323	'06096	K	5120	1968	Warehouse	2011	<b>LBP</b>
324	'06097	K	5120	1968	Warehouse	2011	<b>LBP</b>
325	'06098	K	5120	1968	Warehouse	2011	<b>LBP</b>
326	'06099	K	5939	1968	Warehouse	2009	LCP
327	'06139	K	2686	1958		2012	<b>LBP</b>
328	'06140	K	3867	1958		2012	<b>LBP</b>
329	'06143	K	64	1960		2012	LCP
330	'06145	K	23450	1974		2012	<b>LBP</b>
331	'06146	K	4800	1999		2008	LCP
332	'06225	K	60174	1990		2006	<b>LBP</b>
333	'06226	K	120	1990	Guard Shack		
334	'06234	K	7970	1990		2009	<b>LBP</b>
335	'06240	K	5451	1991		2009	LCP
336	'06241	K	6851	1991		2009	LCP
337	'06247	K	17190	1991		2009	LCP
338	'06248	K	9598	1991		2009	LCP
339	'06249	K	120	1991		2014	LCP
340	'06254	K	9338	1954		2011	<b>LBP</b>
341	'06302	K	5615	1978		2012	<b>LBP</b>
342	'06304	K	5385	1978		2012	<b>LBP</b>
343	'06306	K	5615	1978		2012	<b>LBP</b>
344	'06308	K	5385	1978		2012	<b>LBP</b>
345	'06310	K	7037	1997		2008	LCP
346	'06311	K	2 EA	1978		2014	LBP
347	'06312	K	6182	1978		2013	LCP
348	'06314	K	6182	1978		2013	LCP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
349	'06316	K	6182	1978		2012	<b>LBP</b>
350	'06318	K	6182	1978		2012	LCP
351	'06327	K	192	1978		2012	LCP
352	'06329	K	192	1978		2008	LCP
353	'06390	K	12792	1985		2009	LCP
354	'06391	K	3106	1994		2014	LCP
355	'06419	K	7037	1997		2008	LCP
356	'06421	K	6898	1997		2008	LCP
357	'06454	K	10000	1963		2011	<b>LBP</b>
358	'06456	K	10000	1942		2011	<b>LBP</b>
359	'06460	K	10000	1963		2011	<b>LBP</b>
360	'06464	K	10000	1963		2011	<b>LBP</b>
361	'06468	K	10000	1963		2011	<b>LBP</b>
362	'06470	K	10000	1963		2012	<b>LBP</b>
363	'06474	K	10000	1963		2012	LCP
364	'06486	K	2000	1994		2012	LCP
365	'06488	K	21623	1994		2013	LCP
366	'06489	K	9052	1994		2012	LCP
367	'06490	K	600	1985		2012	LCP
368	'06492	K	7037	1998		2008	LCP
369	'06494	K	7037	1998		2008	LCP
370	'06498	K	3750	1993		2010	LCP
371	'06502	K	5615	1978		2013	<b>LBP</b>
372	'06504	K	5385	1978		2013	<b>LBP</b>
373	'06506	K	5615	1978		2013	<b>LBP</b>
374	'06508	K	5385	1978		2013	LCP
375	'06511	K	2 EA	1978		2014	<b>LBP</b>
376	'06512	K	6182	1978		2013	<b>LBP</b>
377	'06514	K	6182	1978		2013	<b>LBP</b>
378	'06516	K	6182	1978		2013	LCP
379	'06518	K	6182	1978		2013	<b>LBP</b>
380	'06523	K	2 EA	1978		2006	LCP
381	'06527	K	192	1978		2006	LCP
382	'06529	K	192	1978		2009	LCP
383	'06530	K	2558	1986		2009	LCP
384	'06531	K	460	1985		2009	LCP
385	'06532	K	231	1986		2009	LCP
386	'06533	K	2688	1985		2009	<b>LBP</b>
387	'06535	K	21745	1985		2009	<b>LBP</b>
388	'06536	K	84	1985		2013	No
389	'06538	K	713	1985		2013	LCP
390	'06548	K	10944	1990		2009	<b>LBP</b>
391	'06551	K	16758	1981		2010	LCP
392	'06555	K	18377	1984		2010	<b>LBP</b>
393	'06559	K	31415	1985		2010	<b>LBP</b>
394	'06563	K	19121	1987		2010	LCP
395	'06601	T	4320	1959	Barn	2006	LCP
396	'06602	T	4356	1959	Barn	2011	<b>LBP</b>
397	'06603	T	3000	1981		2013	LCP
398	'06604	T	2000	1964	Bunker	2005	

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
399	'06605	T	2000	1964	Bunker	2006	<b>LBP</b>
400	'06606	T	2000	1964	Bunker	2005	
401	'06607	T	2000	1964	Bunker	2006	<b>LBP</b>
402	'06608	T	2000	1964	Bunker	2005	
403	'06609	T	2000	1964	Bunker	2006	<b>LBP</b>
404	'06610	T	2000	1964	Bunker	2006	<b>LBP</b>
405	'06611	T	2000	1964	Bunker	2006	<b>LBP</b>
406	'06613	T	3456	1990		2009	No
407	'06614	T	1260	1973		2013	No
408	'06615	T	800	1943		2011	<b>LBP</b>
409	'06616	T	400	1990		2009	LCP
410	'06617	T	10800	1973		2013	LCP
411	'06618	T	4752	1991		2012	No
412	'06619	T	6000	1975	Barn	2012	LCP
413	'06620	T	515	1978		2011	LCP
414	'06621	T	2800	1980		2009	LCP
415	'06622	T	153	1976		2006	LCP
416	'06623	T	74 KG	1976		2010	LCP
417	'06624	T	261	1976		2005	LCP
418	'06625	T	3565	1981		2013	LCP
419	'06626	T	3565	1981		2009	LCP
420	'06627	T	30235	1991		2014	LCP
421	'06628	T	9000	1976		2014	<b>LBP</b>
422	'06633	T	16062	1994		2014	LBP
423	'06634	T	3546	1976		2012	LCP
424	'06636	T	63721	1987		2014	LCP
425	'06638	T	1056	2002		2010	No
426	'06639	T	7487	1996	Air Field Tower	2014	LCP
427	'06645	T	2944	1983		2008	LCP
428	'06646	T	1560	1984		2009	LCP
429	'06647	T	1701	1976		2014	LCP
430	'06648	T	10430	1999		2009	LCP
431	'06649	T	4000	2000		2009	No
432	'06650	T	4000	2000		2009	No
433	'06651	T	4000	2000		2009	No
434	'06653	T	4800	1994		2014	No
435	'06654	T	7500	1998		2014	No
436	'06656	T	600	1995		2009	No
437	'06657	T	820	1973		2011	LCP
438	'06660	T	733	1994		2002	LCP
439	'06694	T	100	1955	Fire Tower	2013	<b>LBP</b>
440	'06695	T	600	1998		2009	LCP
441	'06721	T	7714	1958	Chapel	2011	<b>LBP</b>
442	'06729	T	3610	1958		2011	<b>LBP</b>
443	'06730	T	38138	1954		2002	<b>LBP</b>
444	'06731	T	43509	1954		2002	<b>LBP</b>
445	'06732	T	38442	1954		2002	<b>LBP</b>
446	'06733	T	37977	1954		2002	<b>LBP</b>
447	'06734	T	3610	1958		2011	<b>LBP</b>
448	'06735	T	2746	1955		2012	<b>LBP</b>

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
449	'06736	T	2581	1965		2011	LCP
450	'06759	T	6198	2001		2008	LCP
451	'06760	T	15142	2001		2008	LCP
452	'06761	T	20494	2001		2014	LBP
453	'06762	T	93516	2001		2010	LCP
454	'06763	T	125066	2000		2010	LCP
455	'06764	T	125066	2000		2010	LCP
456	'06765	T	14284	1999		2013	LCP
457	'06766	T	38647	1999		2014	LCP
458	'06767	T	14284	1999		2013	LCP
459	'06768	T	38647	2001		2014	LCP
460	'06769	T	17144	2001		2013	No
461	'06770	T	38647	2001		2014	LCP
462	'06801	T	32652	1954		2014	<b>LBP</b>
463	'06802	T	120	1991		2006	LCP
464	'06803	T	100	1954		2003	<b>LBP</b>
465	'06804	T	5217	1954	Motor Pool	2013	<b>LBP</b>
466	'06806	T	2 EA	1958		2006	<b>LBP</b>
467	'06808	T	4752	1963	Motor Pool	2013	<b>LBP</b>
468	'06810	T	124	1958	Motor Pool	2006	<b>LBP</b>
469	'06811	T	151	1958	Motor Pool	2006	<b>LBP</b>
470	'06812	T	192	1958	Motor Pool	2004	<b>LBP</b>
471	'06817	T	151	1958	Motor Pool	2005	<b>LBP</b>
472	'06818	T	124	1958	Motor Pool	2013	<b>LBP</b>
473	'06819	T	151	1958	Motor Pool	2013	<b>LBP</b>
474	'06821	T	192	1954	Motor Pool	2013	<b>LBP</b>
475	'06823	K	2 EA	1958		2014	<b>LBP</b>
476	'06827	T	120	1997		2014	LCP
477	'06828	T	34155	1997	Motor Pool	2014	LCP
478	'06829	T	6300	1997	Motor Pool Storage		
479	'06830	T	120	2000		2014	LCP
480	'06832	T	7000	2000	Motor Pool Storage		
481	'06833	T	12975	2000	Motor Pool		
482	'06835	T	120	2000		2014	LCP
483	'06836	T	12506	2000	Motor Pool		
484	'06837	T	6300	2000	Motor Pool Storage		
485	'06838	T	21417	2000		2007	LCP
486	'06843	T	5284	1954	Motor Pool	2004	<b>LBP</b>
487	'06844	T	4748	1954	Motor Pool	2005	<b>LBP</b>
488	'06846	T	192	1954	Motor Pool	2013	<b>LBP</b>
489	'06847	T	5105	1954	Motor Pool	2013	<b>LBP</b>
490	'06849	T	5217	1954	Motor Pool	2013	<b>LBP</b>
491	'06850	T	4748	1954	Motor Pool	2013	<b>LBP</b>
492	'06870	T	120	1987	Guard Shack		
493	'06874	T	29017	1987		2008	<b>LBP</b>
494	'06876	T	1 EA	1987		2014	<b>LBP</b>
495	'06878	T	1 EA	1987		2014	<b>LBP</b>
496	'06879	T	8698	1999		2009	LCP
497	'06880	T	1764	1987	Grease Rack	2014	LCP
498	'06881	T	120	1987		2014	LCP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
499	'06883	T	21980	1999	Air Assault School		
500	'06884	T	1040	1987		2009	No
501	'06886	T	5600	1987	Motor Pool Storage		
502	'06887	T	10248	1987		2009	<b>LBP</b>
503	'06888	T	3500	1994		2010	No
504	'06889	T	199	1994	Insp. Exception basis only		
505	'06890	T	29792	1994	Motor Pool		
506	'06892	T	30130	1994	Motor Pool		
507	'06893	T	120	1994		2014	LCP
508	'06901	T	9303	1954		2011	<b>LBP</b>
509	'06902	T	3867	1958		2011	<b>LBP</b>
510	'06903	T	2686	1958		2011	<b>LBP</b>
511	'06904	T	2581	1965		2011	LCP
512	'06905	T	2581	1965		2011	<b>LBP</b>
513	'06906	T	2581	1965		2011	LCP
514	'06907	K	2581	1965		2013	<b>LBP</b>
515	'06908	K	2581	1965		2014	LBP
516	'06909	T	31758	1954		2004	<b>LBP</b>
517	'06910	T	38089	1954		2004	<b>LBP</b>
518	'06911	T	38280	1954		2004	<b>LBP</b>
519	'06912	T	38310	1954		2005	<b>LBP</b>
520	'06913	T	2581	1958		2011	<b>LBP</b>
521	'06914	T	3610	1958		2012	<b>LBP</b>
522	'06915	T	3610	1958		2011	<b>LBP</b>
523	'06916	T	2581	1958		2011	<b>LBP</b>
524	'06917	T	38480	1956		2002	<b>LBP</b>
525	'06918	T	38646	1956		2002	<b>LBP</b>
526	'06919	K	38711	1956		2001	<b>LBP</b>
527	'06920	K	38649	1956		2001	<b>LBP</b>
528	'06921	K	38512	1956		2000	<b>LBP</b>
529	'06922	K	38691	1956		2003	<b>LBP</b>
530	'06923	K	38465	1956		2003	<b>LBP</b>
531	'06924	K	2581	1963		2012	<b>LBP</b>
532	'06925	K	3610	1958		2011	<b>LBP</b>
533	'06926	K	2581	1956		2012	<b>LBP</b>
534	'06927	K	38118	1954		2005	<b>LBP</b>
535	'06928	K	38120	1954		2005	<b>LBP</b>
536	'06929	K	38281	1954		2005	<b>LBP</b>
537	'06930	K	38196	1954		2005	<b>LBP</b>
538	'06931	K	31713	1954		2005	<b>LBP</b>
539	'06989	T	14900	1996		2009	LCP
540	'06990	T	20618	1974		2011	<b>LBP</b>
541	'06991	T	3688	1978		2011	LCP
542	'06992	K	20618	1974		2011	<b>LBP</b>
543	'06993	T	3688	1978		2011	<b>LBP</b>
544	'06995	T	3688	1978		2011	LCP
545	'06997	K	7135	1978		2012	LCP
546	'07005	T	4748	1954	Motor Pool	2013	<b>LBP</b>
547	'07006	T	5215	1958	Motor Pool	2013	<b>LBP</b>
548	'07007	T	120	1958		2013	<b>LBP</b>

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
549	'07009	T	192	1958	Motor Pool	2013	<b>LBP</b>
550	'07010	T	143	1958		2013	<b>LBP</b>
551	'07014	T	2280	1958	Grease Rack	2014	<b>LBP</b>
552	'07035	K	2700	1986		2013	<b>LBP</b>
553	'07039	K	126841	2002	Barrachs		
554	'07042	K	4808	1954	Motor Pool	2014	<b>LBP</b>
555	'07043	K	4748	1958	Motor Pool	2013	<b>LBP</b>
556	'07044	K	126841	2002	Barrachs		
557	'07047	K	5077	1967	Motor Pool	2013	<b>LBP</b>
558	'07048	K	20601	2002	DFAC		
559	'07049	K	5217	1954		2013	<b>LBP</b>
560	'07050	K	4808	1954	Motor Pool	2013	<b>LBP</b>
561	'07051	K	124	1958		2013	<b>LBP</b>
562	'07052	K	3779	2002		2010	LCP
563	'07055	K	151	1958	Motor Pool	2013	<b>LBP</b>
564	'07060	K	3538	1986		2007	LCP
565	'07061	K	728	1986		2013	LCP
566	'07062	K	21424	1986		2013	<b>LBP</b>
567	'07064	K	1764	1986	Grease Rack	2014	LCP
568	'07065	K	96	1996		2014	LCP
569	'07066	K	1764	1986		2014	LCP
570	'07068	K	1764	1986	Grease Rack	2014	<b>LBP</b>
571	'07070	K	1764	1986	Grease Rack	2014	<b>LBP</b>
572	'07075	K	61419	2002	HQ Bldg.		
573	'07076	K	14284	2002		2013	LCP
574	'07077	K	14284	2002		2013	LCP
575	'07078	K	13347	2002		2013	LCP
576	'07079	K	24455	2002		2013	<b>LBP</b>
577	'07081	K	14284	2002		2013	LCP
578	'07082	K	24445	2002		2013	LCP
579	'07083	K	120	1985		2013	LCP
580	'07084	K	14284	2002		2013	LCP
581	'07085	K	17418	1985		2013	<b>LBP</b>
582	'07086	K	24445	2002		2013	LCP
583	'07087	K	560	1985		2013	LCP
584	'07088	K	1764	1985	Grease Rack	2007	LCP
585	'07089	K	1764	1985		2013	LCP
586	'07090	K	120	1985	No suspect coating	2007	No
587	'07092	K	2800	1985		2007	LCP
588	'07093	K	2800	1985		2007	LCP
589	'07094	K	111448	1996	Barrachs		
590	'07095	K	14116	1996		2012	LCP
591	'07096	K	99706	1997	Barrachs		
592	'07097	K	10398	1996		2012	LCP
593	'07098	K	10399	1996		2012	LCP
594	'07099	K	10399	1996		2012	LCP
595	'07100	K	144	1996		2008	LCP
596	'07105	K	1345	1959		2010	LCP
597	'07106	K	10398	1997		2012	LCP
598	'07107	K	10396	1997		2012	LCP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
599	'07108	K	1684	1993		2008	No
600	'07110	K	23628	1969		2009	<b>LBP</b>
601	'07111	K	21398	1996	HQ Bldg.		
602	'07112	K	25625	1969		2009	<b>LBP</b>
603	'07113	K	14729	1996	HQ Bldg.		
604	'07114	K	7173	1969		2011	<b>LBP</b>
605	'07116	K	6909	1959		2012	<b>LBP</b>
606	'07117	K	3401	1997		2010	LCP
607	'07118	K	25625	1959		2002	<b>LBP</b>
608	'07119	K	9597	1997		2012	LCP
609	'07120	K	25625	1959		2005	<b>LBP</b>
610	'07121	K	3440	1994		2008	LCP
611	'07123	K	22750	1996		2012	LCP
612	'07124	K	27287	1997	HQ Bldg.		
613	'07125	K	10800	1996		2012	LCP
614	'07126	K	10830	1996		2012	LCP
615	'07127	K	12950	1997		2012	LCP
616	'07128	K	6570	1998		2010	<b>LBP</b>
617	'07129	K	8743	1993		2008	LCP
618	'07130	K	10200	1986		2008	LCP
619	'07131	K	15404	1978		2013	LCP
620	'07132	K	6550	1985		2013	<b>LBP</b>
621	'07133	K	10269	1978		2013	LCP
622	'07134	K	8742	1993		2008	LCP
623	'07137	K	3840	1965		2011	LCP
624	'07138	K	4170	1997		2008	LCP
625	'07140	K	414	1987		2011	LCP
626	'07141	K	5389	1967		2011	<b>LBP</b>
627	'07142	K	5200	1985		2008	LCP
628	'07143	K	5250	1999		2008	LCP
629	'07144	K	5200	1985		2008	LCP
630	'07145	K	2581	1956		2011	<b>LBP</b>
631	'07146	K	36675	2002		2014	LCP
632	'07147	K	2880	2002		2014	LCP
633	'07149	K	9248	1974		2014	<b>LBP</b>
634	'07150	K	9237	1971		2012	<b>LBP</b>
635	'07152	K	20511	1963	Hanger	2014	<b>LBP</b>
636	'07153	K	1200	1963		2013	<b>LBP</b>
637	'07154	K	36677	1963	Hanger	2014	<b>LBP</b>
638	'07155	K	4518	1963		2012	<b>LBP</b>
639	'07156	K	34785	1963	Hanger	2014	<b>LBP</b>
640	'07157	K	6649	1971		2012	LCP
641	'07158	K	100	1993		2013	LCP
642	'07159	K	4259	1967		2011	<b>LBP</b>
643	'07160	K	12516	1959		2012	<b>LBP</b>
644	'07161	K	11218	1963	Hanger	2012	<b>LBP</b>
645	'07163	K	11756	1975		2014	<b>LBP</b>
646	'07164	K	3105	1956		2012	<b>LBP</b>
647	'07165	K	954	1981		2014	<b>LBP</b>
648	'07166	K	2400	1998		2014	LBP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

Updated 05 November 2014

	A	B	C	D	E	F	G
649	'07168	K	1504	1953		2006	<b>LBP</b>
650	'07170	K	8400	1967		2012	<b>LBP</b>
651	'07172	K	336	1965	Shack	2005	LCP
652	'07173	K	4000	1965		2011	LCP
653	'07176	K	3230	1983		2014	<b>LBP</b>
654	'07177	K	5512	1965		2012	<b>LBP</b>
655	'07178	K	120	1983		2014	LCP
656	'07179	K	9300	1965		2012	<b>LBP</b>
657	'07183	K	1 EA	1998		2007	No
658	'07188	K	5519	1993		2014	No
659	'07189	K	5520	1993		2014	LCP
660	'07191	K	13524	1996		2008	<b>LBP</b>
661	'07201	K	186	1975	Receiver Bldg.	2005	<b>LBP</b>
662	'07202	K	1392	1959		2012	<b>LBP</b>
663	'07203	K	441	1989		2008	No
664	'07205	K	157000 GA	1974	Pump house	2005	LCP
665	'07206	K	24178	1974		2006	<b>LBP</b>
666	'07208	K	41912	1974		2003	<b>LBP</b>
667	'07210	K	32611	1974		2006	<b>LBP</b>
668	'07211	K	5200	1985		2008	LCP
669	'07212	K	1849	1975		2012	<b>LBP</b>
670	'07213	K	5231	1985		2008	No
671	'07214	K	41860	1974		2003	<b>LBP</b>
672	'07215	K	5200	1985		2008	No
673	'07218	K	41860	1974		2004	<b>LBP</b>
674	'07219	K	245 KG	1974		2011	<b>LBP</b>
675	'07221	K	536	1974		2006	LCP
676	'07223	K	2530	1974		2006	<b>LBP</b>
677	'07225	K	5200	1985		2008	LCP
678	'07230	K	200	1974		2008	LCP
679	'07238	K	100	1999	Guard Shack	2010	LCP
680	'07239	K	5005	1999		2011	No
681	'07240	K	5200	1987		2008	No
682	'07241	K	4556	1975		2011	<b>LBP</b>
683	'07242	K	3000	1993		2008	LCP
684	'07243	K	41117	1991	Hanger		
685	'07244	K	44578	1999		2009	LCP
686	'07245	K	49139	1975		2010	<b>LBP</b>
687	'07246	K	4200	1997		2011	LCP
688	'07249	K	49369	1975		2008	<b>LBP</b>
689	'07251	K	41117	1991	Hanger		
690	'07252	K	3943	1996		2011	LCP
691	'07253	K	3943	1996		2011	LCP
692	'07254	K	1054	2000		2008	LCP
693	'07255	K	2122	2002		2009	LCP
694	'07261	K	4648	1999		2011	LCP
695	'07262	K	69243	1992	Hanger		
696	'07263	K	4674	1994		2009	LCP
697	'07264	K	60000	1990			LCP
698	'07265	K	4232	1997		2011	LCP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
699	'07267	K	19441	1993	Sim Bldg.		
700	'07268	K	60400	1990	Hanger		
701	'07272	K	38968	1988	Hanger		
702	'07273	K	4987	1993		2011	LCP
703	'07274	K	85410	2001	Hanger		
704	'07275	K	5200	1994		2011	LCP
705	'07276	K	12486	1995	HQ Bldg.		
706	'07277	K	22033	1994	HQ Bldg.		
707	'07278	K	12487	1995	HQ Bldg.		
708	'07279	K	5057	1994		2010	LCP
709	'07280	K	4507	1993		2012	LCP
710	'07281	K	11270	1992		2011	<b>LBP</b>
711	'07282	K	4523	1995		2011	LCP
712	'07283	K	4524	1995		2011	LCP
713	'07284	K	1495	2000		2011	LCP
714	'07285	K	5684	1993		2010	LCP
715	'07286	K	5683	1996		2010	No
716	'07287	K	5684	1996		2010	LCP
717	'07288	K	5684	1996		2011	LCP
718	'07289	K	5683	1993		2011	LCP
719	'07290	K	5683	1996		2010	LCP
720	'07293	K	368	1959		2005	<b>LBP</b>
721	'07294	K	72	1993		2010	No
722	'07297	K	159	1959		2005	<b>LBP</b>
723	'07298	K	3985	1997		2011	LCP
724	'07299	K	3939	1996		2011	LCP
725	'07347	T	1198	1969		2013	<b>LBP</b>
726	'07502	T	1227	1951		2011	LCP
727	'07503	T	688	1951		2011	<b>LBP</b>
728	'07504	T	5996	1951		2011	<b>LBP</b>
729	'07509	T	775	1995		2008	LCP
730	'07510	T	14280	1957		2003	<b>LBP</b>
731	'07514	T	4064	1957		2011	<b>LBP</b>
732	'07520	T	5904	1957		2004	LCP
733	'07523	T	62638	1950		1995	<b>LBP</b>
734	'07524	T	800	1994		2010	LCP
735	'07526	T	5655	1950		2005	<b>LBP</b>
736	'07527	T	5980	1950		2011	<b>LBP</b>
737	'07540	T	11574	1955		2011	<b>LBP</b>
738	'07541	T	8908	1953		2011	<b>LBP</b>
739	'07542	T	1170	1955		2011	<b>LBP</b>
740	'07543	T	998	1960		2011	<b>LBP</b>
741	'07562	T	1800	1954		2011	<b>LBP</b>
742	'07563	T	1026	1953		2011	LCP
743	'07565	T	1008	1960		2013	<b>LBP</b>
744	'07573	T	4060	1950		2005	<b>LBP</b>
745	'07574	T	325	1950		2013	<b>LBP</b>
746	'07575	T	7037	1997		2010	<b>LBP</b>
747	'07580	T	12550	1956		2005	<b>LBP</b>
748	'07604	T	5620	1950		2011	<b>LBP</b>

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
749	'07605	T	80	1950		2013	LCP
750	'07606	T	718	1951		2011	LCP
751	'07607	T	1200	1950		2011	LCP
752	'07608	T	592	1951		2013	LCP
753	'07609	T	1440	1950		2013	<b>LBP</b>
754	'07611	T	3360	1951		2012	<b>LBP</b>
755	'07620	T	4430	1952		2011	<b>LBP</b>
756	'07621	T	4430	1952		2011	<b>LBP</b>
757	'07626	T	800	1953		2013	LCP
758	'07630	T	288	1954		2006	LCP
759	'07635	T	280	1943	Pump house	2003	LCP
760	'07700	T	4086	1950	Bunker	2006	LCP
761	'07702	T	3411	1950	Bunker	2004	LCP
762	'07703	T	64	1952		2007	<b>LBP</b>
763	'07704	T	3358	1950	Bunker		
764	'07705	T	36	1952		2007	<b>LBP</b>
765	'07706	T	4180	1950	Bunker	2007	<b>LBP</b>
766	'07707	T	49	1952		2007	<b>LBP</b>
767	'07708	T	4958	1950	Bunker	2006	<b>LBP</b>
768	'07709	T	154	1950		2014	LCP
769	'07710	T	3099	1950	Bunker	2006	LCP
770	'07711	T	154	1950		2014	LCP
771	'07712	T	2798	1952		2007	LCP
772	'07714	T	3657	1950	Bunker	2006	LCP
773	'07715	T	53	1950		2014	LBP
774	'07716	T	3543	1950	Bunker	2008	LCP
775	'07718	T	3657	1950	Bunker	2004	LCP
776	'07720	T	4383	1950	Bunker	2004	LCP
777	'07721	T	49	1954		2007	<b>LBP</b>
778	'07722	T	3874	1952		2008	LCP
779	'07723	T	49	1954		2007	<b>LBP</b>
780	'07724	T	921	1954	Bunker	2008	<b>LBP</b>
781	'07725	T	49	1952		2008	<b>LBP</b>
782	'07726	T	3465	1950	Bunker	2006	LCP
783	'07727	T	36	1952		2007	LCP
784	'07728	T	4912	1950	Bunker	2008	LCP
785	'07731	T	49	1952		2007	<b>LBP</b>
786	'07732	T	4549	1950	Bunker	2008	LCP
787	'07733	T	36	1952		2007	<b>LBP</b>
788	'07734	T	3248	1950	Bunker	2006	LCP
789	'07735	T	1024	1976	Bunker	2005	LCP
790	'07736	T	3590	1950	Bunker	2006	LCP
791	'07738	T	3590	1950	Bunker	2006	LCP
792	'07739	T	36	1952		2007	<b>LBP</b>
793	'07740	T	10655	1950		2014	LCP
794	'07742	T	2796	1950	Bunker	2007	LCP
795	'07744	T	3749	1950	Bunker	2006	<b>LBP</b>
796	'07746	T	3350	1950	Bunker	2006	LCP
797	'07747	T	49	1952		2007	<b>LBP</b>
798	'07748	T	3174	1950	Bunker	2008	LCP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
799	'07749	T	49	1952		2007	<b>LBP</b>
800	'07750	T	3599	1950	Bunker	2008	<b>LBP</b>
801	'07751	T	36	1952		2007	No
802	'07752	T	2970	1950	Bunker	2008	LCP
803	'07753	T	52	1950		2014	LBP
804	'07811	T	22835	1953		2012	<b>LBP</b>
805	'07812	T	1920	1957		2012	LCP
806	'07813	T	100	1966		2012	LCP
807	'07814	T	2108	1953		2004	<b>LBP</b>
808	'07819	T	7750	1997		2013	LCP
809	'07820	T	3224	1953		2011	<b>LBP</b>
810	'07821	T	540	1981		2011	<b>LBP</b>
811	'07824	T	144	1999		2013	No
812	'07825	T	15111	1961		2011	<b>LBP</b>
813	'07830	T	2353	1952		2011	<b>LBP</b>
814	'07831	T	36	1952		2011	LCP
815	'07832	T	1930	1953		2012	<b>LBP</b>
816	'07833	T	8804	1953		2012	<b>LBP</b>
817	'07834	T	13459	1949		2012	<b>LBP</b>
818	'07835	T	2108	1952		2012	LCP
819	'07843	T	1440	1950		2012	LCP
820	'07845	T	274	1949		2006	No
821	'07847	T	336	1949	Bunker (ACM)		
822	'07851	T	1089	1951		2011	<b>LBP</b>
823	'07854	T	7700	1986		2008	No
824	'07855	T	10815	1951		2014	<b>LBP</b>
825	'07856	T	9607	1952		2012	<b>LBP</b>
826	'07857	T	9618	1967		2006	<b>LBP</b>
827	'07858	T	4284	1957		2011	<b>LBP</b>
828	'07860	T	2171	1954		2011	<b>LBP</b>
829	'07861	T	2171	1954		2013	<b>LBP</b>
830	'07862	T	2171	1954		2011	<b>LBP</b>
831	'07863	T	2171	1954		2013	<b>LBP</b>
832	'07865	T	2171	1954		2011	LCP
833	'07871	T	1698	1952		2012	<b>LBP</b>
834	'07872	T	787	1957		2013	LCP
835	'07873	T	1746	1949		2006	LCP
836	'07874	T	3012	1952		2011	<b>LBP</b>
837	'07876	T	49	1954		2014	<b>LBP</b>
838	'07877	T	2472	1954		2006	<b>LBP</b>
839	'07878	T	49	1954		2014	LBP
840	'07882	T	7233	1949		2012	<b>LBP</b>
841	'07884	T	290	1966		2012	LCP
842	'08001	T	2147	1952		2010	LCP
843	'08002	T	2147	1952	Bunker	2004	LCP
844	'08003	T	2147	1952	Bunker	2004	LCP
845	'08004	T	2147	1952	Bunker	2005	LCP
846	'08005	T	2147	1952	Bunker	2005	LCP
847	'08006	T	2419	1952	Bunker	2005	LCP
848	'08007	T	2419	1952	Bunker	2004	<b>LBP</b>

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
849	'08008	T	2419	1952	Bunker	2005	LBP
850	'08009	T	2419	1952	Bunker	2004	LBP
851	'08010	T	2419	1952	Bunker	2004	LBP
852	'08011	T	2419	1952	Bunker	2004	LBP
853	'08012	T	2419	1952	Bunker	2005	LBP
854	'08013	T	2419	1952	Bunker	2005	LBP
855	'08014	T	2419	1952	Bunker	2005	LBP
856	'08015	T	2419	1952	Bunker	2005	LBP
857	'08016	T	2419	1952	Bunker	2005	LBP
858	'08017	T	2419	1952	Bunker	2005	LBP
859	'08018	T	2419	1952	Bunker	2005	LBP
860	'08019	T	2419	1952	Bunker	2005	LBP
861	'08020	T	2419	1952	Bunker	2005	LBP
862	'08021	T	2419	1952	Bunker	2005	LBP
863	'08022	T	2419	1952	Bunker	2005	LBP
864	'08023	T	2419	1952	Bunker	2005	LBP
865	'08024	T	2419	1952	Bunker	2005	LBP
866	'08025	T	2419	1952	Bunker	2005	LBP
867	'08026	T	2419	1952	Bunker	2005	LBP
868	'08027	T	2419	1952	Bunker	2005	LBP
869	'08028	T	2419	1952	Bunker	2005	LBP
870	'08029	T	2419	1952	Bunker	2005	LBP
871	'08030	T	2419	1952	Bunker	2005	LBP
872	'08031	T	2419	1952	Bunker	2005	LBP
873	'08032	T	2419	1952	Bunker	2005	LBP
874	'08033	T	2419	1952	Bunker	2005	LBP
875	'08034	T	2419	1952	Bunker	2005	LBP
876	'08035	T	2519	1952	Bunker	2005	LBP
877	'08036	T	2519	1952	Bunker	2005	LBP
878	'08037	T	2519	1952	Bunker	2005	LBP
879	'08038	T	2519	1952	Bunker	2005	LBP
880	'08039	T	2519	1952	Bunker	2005	LBP
881	'08040	T	2419	1952	Bunker	2005	LBP
882	'08041	T	2419	1952	Bunker	2005	LBP
883	'08042	T	2419	1952	Bunker	2006	LBP
884	'08043	T	2419	1952	Bunker	2005	LBP
885	'08044	T	2419	1952	Bunker	2004	LCP
886	'08045	T	2419	1952	Bunker	2005	LBP
887	'08046	T	2419	1952	Bunker	2006	LBP
888	'08047	T	2419	1952	Bunker	2005	LBP
889	'08048	T	2419	1952	Bunker	2005	LBP
890	'08049	T	2419	1952	Bunker	2005	LBP
891	'08050	T	2419	1952	Bunker	2005	LBP
892	'08051	T	2419	1952	Bunker	2005	LBP
893	'08052	T	2419	1952	Bunker	2006	LBP
894	'08053	T	2419	1952	Bunker	2005	LBP
895	'08054	T	2419	1952	Bunker	2005	LBP
896	'08055	T	2419	1952	Bunker	2005	LBP
897	'08056	T	2419	1952	Bunker	2005	LBP
898	'08057	T	2419	1952	Bunker	2005	LBP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
899	'08058	T	2419	1952	Bunker	2005	<b>LBP</b>
900	'08059	T	2419	1952	Bunker	2005	<b>LBP</b>
901	'08060	T	2419	1954	Bunker	2005	<b>LBP</b>
902	'08062	T	4432	1975	Storage Facility	2012	<b>LBP</b>
903	'08063	T	4432	1975	Storage Facility	2012	<b>LBP</b>
904	'09001	T	3250	1999		2014	LCP
905	'09002	T	4732	1999		2014	LCP
906	'09003	T	4949	1999		2014	LCP
907	'09010	T	6598	2002		2010	LCP
908	'09011	T	474	2002		2010	No
909	01R28	T	800	1988		2009	LCP
910	01R3	T	Unknown	Unknown		2010	No
911	01R3A	T	Unknown	Unknown		2010	No
912	01RN9	T	966	1994		2010	LCP
913	02R28	T	552	1988		2009	LCP
914	02R3A	T	Unknown	Unknown		2010	No
915	02RN9	T	800	1994		2010	No
916	03R28	T	552	1988		2009	LCP
917	04R28	T	800	1988		2009	LCP
918	04RS1	T	337.5	1997	Insp. Exception basis only		
919	05R28	T	312	1988		2009	LCP
920	05RN9	T	200	1994		2010	LCP
921	06R28	T	760	1988		2009	LCP
922	07R28	T	1 EA	1988		2009	LCP
923	08R28	T	552	1988		2009	LCP
924	09R28	T	552	1988		2009	No
925	10R28	T	120	1988		2009	LCP
926	11R28	T	1 EA	1999		2009	LCP
927	14RS1	T	337.5	1997	Insp. Exception basis only		
928	14RS2	T	337.5	1997	Insp. Exception basis only		
929	14RS3	T	337.5	1997	Insp. Exception basis only		
930	15RS1	T	337.5	1997	Insp. Exception basis only		
931	15RS2	T	337.5	1997	Insp. Exception basis only		
932	15RS3	T	337.5	1997	Insp. Exception basis only		
933	1RN02	T	Unknown	Unknown		2010	LCP
934	1RN09	T	966	1994	Range building	2007	LCP
935	1RN10	T	119	1992	Range building	2009	LCP
936	1RN36	T	800	1992	Insp. Exception basis only		
937	1RN46	K	220	1991	Insp. Exception basis only		
938	2RN02	T	Unknown	Unknown		2010	No
939	2RN03	T	Unknown	Unknown	Range building	2010	No
940	2RN09	T	800	1994	Range building	2007	LCP
941	2RN36	T	800	1992	Range building	2007	No
942	3RN02	T	Unknown	Unknown	Range building	2010	LCP
943	3RN09	T	Unknown	1994	Range building	2007	LCP
944	3RN36	T	966	1992		2009	No
945	4RN09	T	Unknown	1994	Range building	2007	LCP
946	4RN36	T	Unknown	1992	Range building	2007	LCP
947	5RN09	T	200	1994	Range building	2007	No
948	5RN36	T	240	1992		2009	No

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
949	6RN09	T	800	1994	Range building	2007	LCP
950	6RN36	T	200	1992	Insp. Exception basis only		
951	7RN09	T	120	1994	Range building	2007	LCP
952	7RN36	T	1 EA	1992	Range building	2007	No
953	0092A	T	700	1992	Insp. Exception basis only		
954	A0127	K	400	1988		2012	No
955	A1568	T	196	1964		2012	LCP
956	A1583	T	199	1975	Priority	2010	LCP
957	A1584	T	199	1975	Priority	2010	LCP
958	A1585	T	199	1975	Priority	2010	LCP
959	A2577	T	22793	1965		2014	LBP
960	A3000	K	1500	1995		2010	No
961	A4190	K	1500	1993		2011	<b>LBP</b>
962	A5004	K	1687	1992		2014	LCP
963	A5212	T	2161	1989		2013	No
964	A5225	T	2000	2001		2009	No
965	A5663	T	234	1983		2014	LCP
966	A6001	T	692	1989		2009	LCP
967	A6090	K	1559	1996		2010	LCP
968	A6092	K	693	1989		2009	LCP
969	A6490	K	1200	1965		2012	LCP
970	A6618	T	4752	1991		2009	No
971	A6619	T	120	1983		2012	LCP
972	A6621	T	3437	1980		2009	LCP
973	A6628	T	157	1976		2014	LCP
974	A6631	T	320	2000		2009	LCP
975	A6636	T	249	1987		2014	LCP
976	A6638	T	75000	2002		2009	No
977	A6645	T	276	1983		2008	LCP
978	A6647	T	1920	1984		2014	LCP
979	A6885	T	1 EA	1998		2009	LCP
980	A6921	K	1470	1976		2014	<b>LBP</b>
981	A6924	K	3688	1978		2012	LCP
982	A6989	T	30000	1996		2009	LCP
983	A7060	K	1999	1989		2007	LCP
984	A7062	K	1600	1989		2007	LCP
985	A7103	K	1101	1950		2010	<b>LBP</b>
986	A7104	K	1101	1950		2010	<b>LBP</b>
987	A7134	K	8280	1994		2008	No
988	A7140	K	414	1959		2014	<b>LBP</b>
989	A7146	K	8496	2002		2010	LCP
990	A7154	K	1200	1980		2014	LCP
991	A7156	K	1200	1977		2014	LCP
992	A7163	K	156	1975		2014	LCP
993	A7170	K	4000	1984		2008	LCP
994	A7177	K	4859	1992		2013	No
995	A7180	K	89	2002	Insp. Exception basis only		
996	A7201	K	186	1975	Insp. Exception basis only		
997	A7230	K	174	1974		2008	LCP
998	A7277	K	187	1994		2011	No

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
999	A7278	K	1013	1995		2010	No
1000	A7290	K	8400	1997		2011	No
1001	A7297	K	157	1959	Insp. Exception basis only		
1002	A7635	K	400	1982		2010	LCP
1003	A7858	T	150	1957		2011	<b>LBP</b>
1004	B0127	K	783	1991		2012	No
1005	B2577	T	12131	1965		2014	LCP
1006	B6080	T	1160	1986		2010	LCP
1007	B6087	T	405	1977		2008	LCP
1008	B6090	K	196	1996		2010	No
1009	B6099	K	3200	1987		2011	LCP
1010	B6631	T	180	2000		2009	LCP
1011	B6636	T	249	1987		2014	LCP
1012	B6647	T	1920	1984		2014	No
1013	B6989	T	1 EA	1996		2009	LCP
1014	B7060	K	1200	1989		2014	LCP
1015	B7103	K	1101	1950		2010	<b>LBP</b>
1016	B7104	K	1101	1950		2010	<b>LBP</b>
1017	B7146	K	8496	2002		2010	No
1018	C5505	T	2000 GA	1994		2009	LCP
1019	C6080	T	1160	1986		2010	<b>LBP</b>
1020	C6087	T	2400	1985		2008	LCP
1021	C6090	K	2400	1996		2010	No
1022	C6647	T	1400	1984		2014	LCP
1023	C7060	K	1200	1989		2007	LCP
1024	C7141	K	192	1967		2008	LCP
1025	D6080	T	5000	1989		2010	No
1026	D6636	T	2400	1989		2014	No
1027	D6647	T	1520	1984		2014	LCP
1028	E6621	T	1706	1981		2006	LCP
1029	E6647	T	2760	1984		2014	LCP
1030	E7140	K	2040	1997		2014	LCP
1031	F6621	T	3200	1985		2008	LCP
1032	F6647	T	828	1984		2014	LCP
1033	F7140	K	1 EA	1997		2014	LCP
1034	F7141	K	120	1967		2008	LCP
1035	G0011	T	33	2001		2014	LCP
1036	G0012	T	33	2001		2014	LCP
1037	G6647	T	828	1984		2014	LCP
1038	H6647	T	978	1984		2014	LCP
1039	J6647	T	978	1984		2014	LCP
1040	K6647	T	978	1984		2014	LCP
1041	L6647	T	978	1984		2014	LCP
1042	M6647	T	978	1984		2014	LCP
1043	N6090	K	5000	1996	Warehouse Storage	2012	
1044	N6647	T	978	1984		2014	LCP
1045	NRAD2	K	234	1994	Insp. Exception basis only		
1046	O6647	T	978	1984		2014	LCP
1047	P6647	T	1944	1993		2014	LCP
1048	Q6647	T	1944	1993		2014	LCP

## Appendix D - OMA Lead Based Paint Survey Tracking List

Based on DPW Master Plans List 21May13

**Updated 05 November 2014**

	A	B	C	D	E	F	G
1049	R0016	K	750	1968		2009	
1050	R0017	K	750	1968	Range building	2008	No
1051	R0027	K	750	1985	Range building	2009	No
1052	R0035	T	12 FP	1967	Range building	2010	No
1053	R0038	K	1 EA	2005	Range building	2008	No
1054	R0042	K	1500	1950		2010	
1055	R0051	T	750	1992	Insp. Exception basis only		
1056	R0052	K	750	1992	Range building	2010	No
1057	R0053	K	1	1991	Insp. Exception basis only		
1058	R0054	K	750	1991	Range building	2010	No
1059	R0055	K	750	1992	Range building	2010	No
1060	R013B	K	119	2009	Insp. Exception basis only		
1061	R013C	K	576	2009	Insp. Exception basis only		
1062	R015A	K	760	2009	Range building	2010	No
1063	R016A	K	1000	2009	Range building	2010	No
1064	R017A	k	1 EA	2005	Range building	2010	No
1065	R042A	K	750	1999	Range building	2010	No
1066	R042B	K	750	1999	Range building	2010	LCP
1067	R044A	T	Unknown	Unknown	Range building	2010	No
1068	R044C	T	15 FP	1998	Range building	2010	LCP
1069	R044E	T	Unknown	Unkown	Range building	2010	No
1070	R6647	T	1944	1993		2014	LCP
1071	T06629	T	4800	1989		2014	<b>LBP</b>
1072	TB6628	T	5200	1987		2014	<b>LBP</b>
1073	T06635	T	4000	1989		2014	LCP
1074	T06637	T	4800	1989		2014	LCP
1075	Z6694	T	100	1955		2013	<b>LBP</b>

## OSHA Standards Interpretation and Compliance Letters

03/01/1999 - Using X-ray fluorescence for analysis of lead in paint and applicability of other agencies lead levels.

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◀ OSHA Standard Interpretation and Compliance Letters - Table of Contents

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- **Record Type:** Interpretation
- **Standard Number:** 1926.62(d)
- **Subject:** Using X-ray fluorescence for analysis of lead in paint and applicability of other agencies lead levels.
- **Information Date:** 03/01/1999

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March 1, 1999

Mr. Hsin H. Chou  
Project Manager  
Panacea Environmental Services  
7699 9th Street, Suite 102  
Buena Park, California 90621

Dear Mr. Chou:

Thank you for your letter of April 22, 1998, regarding the concentration of lead in paint which triggers the lead-in-construction standard, 29 CFR 1926.62. We regret this delay in responding.

The lead-in-construction standard was intended to apply to any detectable concentration of lead in paint, as even small concentrations of lead can result in unacceptable employee exposures depending upon on the method of removal and other workplace conditions. Since these conditions can vary greatly, the lead-in-construction standard was written to require exposure monitoring or the use of historical or objective data to ensure that employee exposures do not exceed the action level. Historical data may be applied to all construction tasks involving lead. Objective data was intended to apply to all tasks other than those listed under paragraph (d)(2) of the standard.

OSHA does not consider X-ray fluorescence (XRF) to be an acceptable method of analysis. As stated in your letter, XRF analyzers are generally considered accurate when concentrations of lead in paint exceed 1 mg/cm<sup>2</sup>. For the purposes of occupational health, these levels are considered substantial and may easily present an exposure hazard. Without having conducted monitoring, or without the benefit of historical or objective data, the employer has no assurance of the employee's exposure.

Other regulatory agencies, such as Housing and Urban Development, the Environmental Protection Agency, and the Consumer Products Safety Commission (CPSC) have designated levels of lead in paint below which they consider the paint to be non-lead containing. The missions of these agencies differ from OSHA's, and for that reason, OSHA cannot recognize these levels as safe under workplace situations.

OSHA has recognized, however, that for certain workplace conditions, application of

OSHA has recognized, however, that for certain workplace conditions, application of objective data to certain tasks listed in paragraph (d)(2)(i)(A) may be warranted (specifically, power tool cleaning with dust collection systems, manual demolition of structures, manual scraping, and manual sanding). For these applications only, we have adopted the CPSC threshold under a very limited set of conditions.

Specifically, when a paint contains trace amounts of lead (e.g., 0.06% and below, as defined by the Consumer Products Safety Commission as non-lead containing, 16 CFR 1303), the employer may determine the concentration of lead in the air (i.e., employee exposure) by multiplying the total airborne concentration of dust times the percentage of lead in the paint. For example, if the concentration of total dust is  $15\text{mg}/\text{m}^3$ ; and the concentration of lead in paint is 0.06%, the airborne lead level will be  $(0.06\%) \times (15\text{mg}/\text{m}^3) \times (1000\mu\text{g}/\text{mg}) = 9\mu\text{g}/\text{m}^3$ . Consequently, the airborne concentration of dust would have to be  $50\text{mg}/\text{m}^3$ ; before the action level of  $30\mu\text{g}/\text{m}^3$ ; would be reached. Arithmetically, this would read,  $(50\text{mg}/\text{m}^3 \text{ airborne paint}) \times (0.06\% \text{ lead}) \times (1000\mu\text{g}/\text{mg}) = 30\mu\text{g}/\text{m}^3$ ; airborne lead.

OSHA wants to stress that this does not set 0.06% as a lower threshold for the concentration of lead in paint which would exempt the employer from the requirements of the standard. The employer must still follow all requirements of the standard and conduct an exposure assessment for the tasks involving lead. Additionally, we are not stating that the Consumer Products Safety Commission level is a "safe" concentration of lead in paint, since all tasks listed under (d)(2) frequently entail exposures above the action level even at extremely low concentrations of lead. We are simply stating that the application of objective data may be applied to the above-specified tasks in paragraph (d)(2)(i)(A), under the conditions stated herein. As these are less aggressive, dust-generating methods of removal, this type of objective data may reasonably be applied.

We trust that this satisfactorily answers your concerns. If we may be of further assistance, please don't hesitate to contact the Office of Health Compliance Assistance on 202-693-2190.

Sincerely,

Richard E. Fairfax  
Director  
Directorate of Compliance Programs

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◀ [OSHA Standard Interpretation and Compliance Letters - Table of Contents](#)