FORT CAMPBELL LEAD-BASED PAINT MANAGEMENT PLAN

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INSTALLATION LEAD-BASED PAINT MANAGEMENT

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INSTALLATION MANAGEMENT COMMAND, SOUTHEAST REGION
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LEAD-BASED PAINT MANAGEMENT PLAN

LETTER OF PROMULGATION

1. Army Regulation (AR) 200-1, "Environmental Protection and Enhancement," outlines a strategy for an installation lead-based paint management program.

2. The objective of the Lead-Based Paint (LBP) 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. Known as the Fort Campbell Lead-Based Paint Management Plan, this plan is hereby approved and implemented at Fort Campbell, Kentucky.

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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 now. Essentially what would be required for certification would be accomplishment of an Environmental Protection Agency Certified Course (with one day updates every second year) such as that offered by The Environmental Institute for Lead-Based Paint Inspectors and Risk Assessors. A third party exam is required initially to become Kentucky or Tennessee certified. 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 is 5 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/cm2) when using the x-ray fluorescence analyzer or 0.5 percent by weight (or 5000 ppm) (equivalent to mg/cm2) 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/cm2 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, when purchasing paint for residential use, per the Consumer Product Safety Commission, is defined as any paint that contains equal to or more than 0.06% (600 ppm) 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 600 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 600 ppm. This term is deceptive; it does not mean that Occupational Safety and Health Administration does not require worker protection measures. (For the purpose of lead containing paint and management on Fort Campbell, lead-based paint free should not be used due to the lack of care it may generate, except for the case where the paint has no detectable level of lead.)

Lead-Based Paint Hazard: Means any condition that causes exposure to lead from lead-contaminated dust (generally resulting from crushed paint chips, friction surfaces, or even impact surfaces), lead-contaminated soil (generally brought in from buildings exterior perimeter), or lead-contaminated paint that is deteriorated (chipping and peeling) or present in accessible surfaces (chewable surfaces) to small children, friction surfaces, or impact surfaces that would result in adverse human health effects as established by the appropriate Federal agency.

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

1. 40 ug/ft2 – Hard Floor and Carpeted Floor
2. 250 ug/ft2 – Interior Window Sills
3. 400 ug/ft2 – Window Wells (Troughs)
4. 800 ug/ft2 – 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 $9ft^2$ 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, or 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-five year control effect.

1. <u>Interim Control Measures</u> (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.

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 KAR 211.900.

GLOSSARY
OF ABBREVIATIONS

AR	Army Regulation
CFR	Code of Federal Regulations
CPSC	Consumer Product Safety Commission
DA	Department of Army
DPW	Directorate of Public Works
DRMO	Defense Reutilization and Marketing Office
EPA	Environmental Protection Agency
HUD	Department of Housing and Urban Development
LCP	Lead Containing Paint
LBP	Lead-Based Paint
LBPMCO	Lead-Based Paint Management and Control Officer (Installation Lead-Based Paint Control Manager from the Public Works Environmental Division)
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
XRF	X-ray Fluorescence

Chapter 1

INTRODUCTION

1.1 PURPOSE

The purpose of the Department of the Army's program is to establish responsibility and standards for identification and control of Lead-Based Paint (LBP) and lead-containing dust in "target facilities", first, then other facilities. Army Regulation (AR) 200-1, "Environmental Protection and Enhancement," outlines 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 this regulation. This plan maintains a permanent record on the status and condition of all LBP in all Army 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. 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.

Issues - The LBP issue is a two-sided coin: Health and Safety on one side and the environment on the other.

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

- The key environmental issue is the disposal factor: If it is hazardous when it is on a building, could it become "hazardous waste" when the building component is disposed of? Construction/demolition debris has historically been overlooked as a potential hazardous waste stream. Common practice has been to place the debris in rubble or construction debris landfills. Still, the Army Environmental Center has taken the initiative to conduct a waste characterization study on LBP contaminated debris (Executive Summary at Appendix A). 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. The findings showed that 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" due to the concentrated mass of LBP. Appendix B contains Army guidance regarding disposal of LBP wastes generated at military residences. This guidance indicates that 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 touches on lead in soil around houses. The EPA does not consider the household waste exclusion to include LBP debris or wastes from building demolition.
- The focal point of the inspection and abatement effort will be LBP. Flaking and peeling paint represents an obvious exposure concern in homes, day care 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.
- Over the last two decades, 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 plus 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. New regulations governing testing, training, abatement, disposal, and worker protection are being developed by federal and state agencies to reduce exposures. By using proper techniques and work procedures, the risk to removal workers and the environment will be much lower. These challenges and the industry's response to them will forever change the methods and procedures used for paint removal, not merely for lead-base coatings, but for all coatings.

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, 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 practically functions, 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 function in relation to other team 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 (CHAINOF COMMAND)

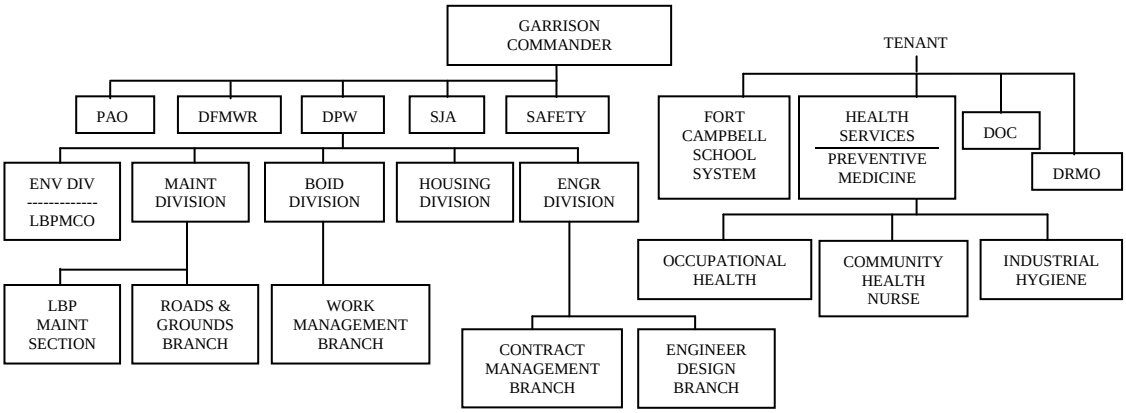
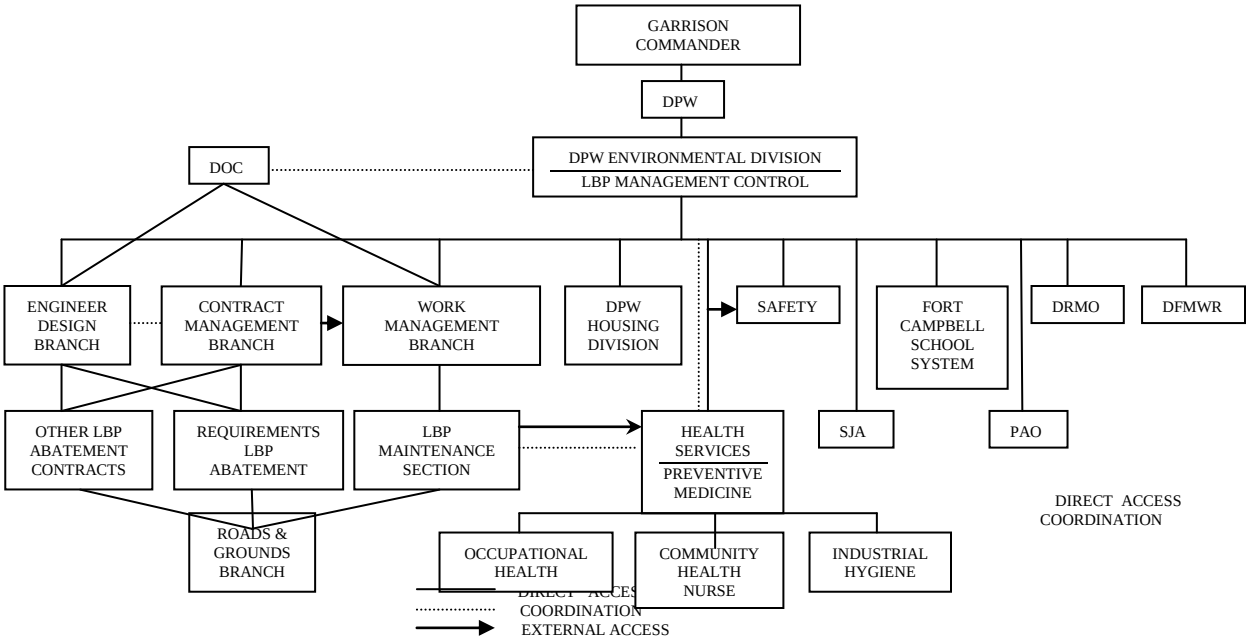


FIGURE 2-2. FORT CAMPBELL LEAD-BASED PAINT MANAGEMENT AND CONTROL



2.2 RESPONSIBILITIES

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**. 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).
    - Directorate of Contracting (DOC).
    - Defense Reutilization and Marketing Office (DRMO).
    - Command Safety Office.
    - 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 LBPMP.
- 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 techniques.

- The LBPMCO has the authority to make changes to or suspend operations of 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 Directorate of Contracting (DOC) 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 surveys of facilities constructed prior to 1978 for the presence of LBP by providing for the maintenance / update of 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 the location of LBP 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 Post 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 lead paint 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 DOC 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.

- Attend LBPMT meetings.
- Ensure proper care of LBP records is given.
- 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 RRP requirements. Inspection procedures will specifically emphasize OSHA/EPA/State LBP precautions. It is recommended that the Contract Management Branch obtain the "LBP Abatement Supervisors" and "EPA Lead RRP" training courses for each LBP inspector.
- Ensure that 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 DRMO.
- Provide performance evaluation to DOC 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. Give proper care of LBP records. Communicate results of abatement actions to LBPMCO.
- Attend LBPMT meetings.

The **DPW Maintenance Division** will:

- Conduct maintenance for all installation buildings that considers the presence of LBP. 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 records on training and health monitoring of personnel involved in LBP abatement.

- Ensure that all DA procurements will utilize paint free of lead. Supply will request current Material Safety Data Sheets (MSDSs) from paint suppliers.
- Ensure that 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, in the case of peeling or flaking LBP.
- Attend LBPMT meetings.
- 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 to the Defense Reutilization and Marketing Office (DRMO).
    - 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 this effort.
    - In-house LBP cleanup is complete.
    - Proper care is given of LBP records.

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

- Ensure that LBP procedures are integrated into work reception; assignment scheduling; and estimating activities, including increased labor and job hours due to LBP/RRP handling 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 that 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 that will be actually used. 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 educational pamphlet to inform all families currently living at the post, new post arrivals (including childless couples), and parents of newborns. Work with the DPW Housing Division to include 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. Day care 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.
- Program and budget available resources to accomplish LBP medical support responsibilities.

The **Fort Campbell Directorate of Contracting (DOC)** will:

- Provide contractual support in procurement of contracted services for surveying and abatement of LBP.
- Provide adequate enforcement of LBP contracts. Make decisions on contract disputes. Ensure contractors adhere to the contract specifications.
- Ensure that project planners and designers have clearly identified lead hazards to contractors in the bid documents. The Contracting Officer, in conjunction with Public Works, should develop standard contract language to inform contractors of the potential to disturb LBP. Project designers will determine where the hazards may exist and what steps the contractors must take to protect installation personnel and families. DOC 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 Lead RRP contracts.
- Review procurement packages and contract specifications to remove any LBP requirement.
- Retain contracts that include LBP removal in accordance with paragraph 6.3.
- Attend LBPMT meetings.

The **Defense Reutilization and Marketing Office (DRMO)**. DRMO will dispose of non-contract generated LBP according to DoD 4160.21-M (the Defense Reutilization and Marketing Manual). DRMO 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** 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 Post personnel. PAO will:

- Coordinate with the LBPMCO to develop timely and appropriate articles on the post 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.
- LBPMT meetings.

The **Directorate of Family, Moral, Welfare and Recreation (DFMWR)** is responsible for attending LBPMT meetings, to keep abreast of LBP issues, and to provide input as necessary.

Chapter 3

LBP MANAGEMENT TEAM MEETINGS

The LBP Management Team will direct development of and monitor the LBP Management Plan. The primary avenue for these actions is through an annual management team meeting. The Team will direct development of Post-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 address the LBP abatement/RRP action required.

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, DOC will ensure compliance.

4.2. INFORMATION DISSEMINATION

Lead-Based Paint could potentially affect any personnel using installation facilities containing LBP. Therefore, the Post 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 post newspaper and other information dissemination avenues. Topics may include up-dating of the LBPMP, facilities' 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 in their homes, if they exists, and act to provide a safe environment for children.

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 that 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, and LBP Abatement Procedures and Practices for Workers and Supervisors, and EPA Lead Repair, Remodeling and Painting. Training will meet federal, state, and local training requirements. Selection and training of personnel shall be completed before anticipated projects. Table 5-1 lists those needing training and the required and recommended training each needs. Five certification courses are specified:

- Building Inspector. Individuals conducting 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; must also take the Building Inspector course beforehand. 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 and was 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.

Consult the Environmental Division Education Representative for the availability of off-site training sources for these courses.

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 though that state. There is an exam and annual fee associated with each certification. Specifics upon 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 the LBP problem 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 of Environmental Quality Officers in lead-based paint awareness is a primary 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	Required: Supervisor/contractor Recommended: Building inspector, risk assessor, EPA RRP Certified Renovator
Industrial Hygiene (PREVMED)	Recommended: Supervisor/contractor, EPA RRP Certified Renovator
Installation government LBP abatement/RRP inspectors (Contract Management Branch)	Required: Supervisor/contractor Recommended: EPA RRP Certified Renovator
LBP Inspector	Required: Building inspector and risk assessor
DPW Customer Support representatives who deal with LBP/RRP impacted work orders	Recommended: LBP Awareness Training
Safety Office representative	Recommended: LBP Awareness Training
Public Affairs Office representative	Recommended: LBP Awareness Training
Government and Contract Maintenance workers (electricians, plumbers, heating, ventilation specialists, etc.)	Required: LBP Awareness Training Required for work in target facilities: EPA RRP Certified Renovator (Supervisors), Non-Certified Worker Training
Custodial staff (Post hospital, school system, contractors)	Required: LBP Awareness Training
Landfill Operators	Recommended: LBP Awareness Training
LBP Waste Haulers on	Required: Hazardous Materials Endorsement Commercial Driver's License (49 CFR 177,800 and 177.816), LBP Awareness Training Recommended: LBP Worker
LBP Abatement Contractors	Required: Supervisor/contractor and Abatement Worker (both required for work in target facilities) or LBP Awareness Training Recommended: 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)	Required for work in target facilities: EPA RRP Certified Renovator / Non-Certified Worker Training
In-House LBP Abatement Team	Required: Supervisor/contractor, Recommended: EPA RRP Certified Renovator (all required for work in target facilities)
"Self-Help" – Surface Preparation Only	Required: LBP Awareness Training (Also ref. Chapter 9)
Engineer Design Branch engineers	Required: Supervisor/contractor, EPA RRP Certified Renovator (for target facilities, otherwise recommended)
Environmental Quality Officers	Required: Environmental Quality Officer's Course

Chapter 6

RECORDKEEPING

6.1 PURPOSE

The proper management of the LBP program will require the 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 stops. 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 that 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 that 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 of the main objectives 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 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 0-27-97X), 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 those structures scheduled for repair, alteration, or demolition. This will aid in assessment prioritizing

Conduct of assessments using trained LBP Inspectors meeting federal and state requirements. 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 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). Even when trace levels of lead are present, an exposure assessment must be accomplished. "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/cm2 when using the x-ray fluorescence analyzer)**: As defined by the CPSC, "lead-free" is paint less than 600 ppm, but this limit is used as a threshold limit for allowable lead in paint for purchase and use in residences only. This term is deceptive, as OSHA still may require special work practices, worker protection measures, training, and medical surveillance based upon an exposure assessment, historical data, or objective data.

As defined by EPA and HUD, LBP is defined as that containing 5000 ppm or greater. This term is also deceptive, as OSHA still may require special work practices, worker protection measures, training, and medical surveillance for levels of lead less than 5000 ppm based upon an exposure assessment, historical data, or objective data.

Within the limits of detectable but less than 5000 ppm, until the employer performs an exposure assessment and documents that employees are not exposed above the Permissible Exposure Limit (PEL) (50 ug/m3), the employer must treat employees performing certain operations as if they were exposed above the PEL (OSHA Lead in Construction Standard, 29 CFR 1926.62). This means providing the following:

Respirators*	Personal protective equipment
Change areas	Hand washing facilities
Biological monitoring	Training

* The level of respiratory protection varies according to the tasks performed.

Once the exposure assessment is accomplished, it may then be used as historical data. Historical data is only good for one year. Exposure assessments are only valid for paint lead concentrations at the established level or lower. When an exposure assessment demonstrates that employees would be exposed to levels above the PEL, the above actions will continue to be required. When exposure at or above the Action Level (AL) (30 ug/m3) for any one day (based upon 8-hour time-weighted average) is reached, medical surveillance is required.

When the exposure assessment demonstrates that employees would be exposed to levels below the PEL, workers may perform the work in compliance with protocol established in appendix F.

Appendix F is a protocol for Lead-Containing Paint (LCP) surface preparation based upon a previous exposure assessment. This protocol and its special work practices are not blanket guidelines. The DPW Environmental Division must approve variations as to the use of this protocol. Follow on exposure assessments and protocols (similar to this one) are needed. The Environmental Division should be consulted for any undated exposure assessment / protocol information.

- **5000 ppm (or in excess of 1.0 mg/cm2 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. This information the designer should specify 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 matter of 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.

Chapter 10

INSTALLATION RENOVATION, REPAIR AND PAINTING (RRP) PLAN

10.1 PURPOSE

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.

10.2 Application for OMA Buildings:

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.

10.2 Application for Schools:

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.

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
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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.

SIM-AEC-EQC (200-1a) 19 Dec 00

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

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."

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

DISTRIBUTION:
COMMANDER
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U.S. ARMY FORCES COMMAND, ATTN: AFEN-ENE (MR. FRNKA/MR. KAPUR), 1777 HARDEE AVENUE, SW., BLDG 200, FORT MCPHERSON, GA 30330-1062
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U.S. ARMY CORPS OF ENGINEERS, ATTN: CEMP-R (MS. RIVERS), CEMP-RI (MR. FENLASON), CEMP-ZB (MR. BROWN), CESO-I (MR. STOUT), 441 G STREET, NW., WASHINGTON, DC 20314-1000
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EIGHTH U.S. ARMY, ATTN: EAEN-EPO (MR. ANDERSON), UNIT 15236, APO AP 96205-0009
(CONT)

APPENDIX C

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Appendix D - OMA Lead-Based Paint Survey Tracking List

Based on DPW Master Building List 19 November 2009

Updated 1 February 2010

Received a Lead Survey
Priority for a Lead Survey
Low Priority for Survey
Demolished
Survey on Exception Basis only
Hazard - No Access

BUILDING NUMBER	STATE	SQUARE FOOTAGE	YEAR BUILT	REMARKS	SURVEYED BY
'00032	T	2720	1950		BAT 2001
'00038	T	16038	1967	Library	BAT 2002
'00039	T	14523	1942		BAT 2003
'00042		1500	1950		BAT 2006
'00043	T	7780	1983		BAT 2009
'00044		750	1962		BAT 2006
'00071	K	88225	1967	School	Unsurveyed
'00073	K	1200	1988	School Stg	Unsurveyed
'00080	K	28580	1991		
'00082	K	4500	1997		BAT 2009
'00083	K	67500	1997		
'00084	K	79344	1961	School	Unsurveyed
'00085	K	4800	1988	School Stg	Unsurveyed
'00086	K	1200	1986	School Stg	Unsurveyed
'00088	T	8240	1999	Credit Union	BAT 2009
'00089	T	14545	1975	Arts & Crafts	BAT 2003
'00091	K	12873	1972	Post Office	BAT 2003
'00092	K	3074	1960	Gas Station	BAT 2003
'00093	T	17492	1949	Wilson Theater	BAT 2003
'00094	K	3430	1958		BAT 2003
'00095	K	21864	1954		BAT 2006
'00096	T	6059	1957		BAT 2003
'00097	K	3250	1958		Advent 1995
'00098	K	102645	1958		Advent 1995
'00099	K	4988	1958		Advent 1995
'00100	K	800	1985		BAT 2009
'00123	K	18864	1943		BAT 2006
'00125	K	18864	1943		BAT 2006
'00127	K	18864	1991		
'00175	K	75626	1957	School - Wassom	Unsurveyed
'00176	K	1240	1988	School Stg	Unsurveyed
'00201	K	3843	2001	per PM - Survey on exception basis only	Unsurveyed
'00202	K	124712	1997		
'00203			2008		BAT 2009
'00205			2008		BAT 2009
'00230	T	8042	1942		BAT 2005
'00232	T	8042	1942		BAT 2006
'00234	T	8042	1942		BAT 2006
'00401	T	571	2003		BAT 2006
'00602	T	3108	1943		BAT 2002
'00603	T	3108	1943		BAT 2005
'00604	T	3171	1943		BAT 2002
'00605	T	3171	1943		BAT 2002
'00606	T	3972	1943		BAT 2006
'00615	T	1920	1942	Car Wash	BAT 2003
'00650	T	455469	1982	Hospital	
'00652	T	7200	2007	Fisher House	BAT 2008
'00710	T	75822	1958	School	Unsurveyed
'00711	T	1200	1984	School Stg	Unsurveyed
'00712	T	1200	1986	School Stg	Unsurveyed
'00719	T	1550	1942	Demo'd	BAT 2002
'00723	T	5310	1942		BAT 2002
'00731	T	4320	1942	Demo'd	BAT 2002
'00734	T	5310	1942		BAT 2006
'00737	T	1672	1943	Demo'd	BAT 2006
'00744	T	9000	1982		BAT 2007
'00749	T	3108	1943		BAT 2001
'00750	T	3108	1943		BAT 2001
'00751	T	18240	1943		BAT 2001
'00752	T	18299	1943		BAT 2001
'00753	T	19249	1943		BAT 2001
'00754	T	18299	1943		BAT 2001
'00755	T	18299	1943		BAT 2001
'00756	T	18299	1943		BAT 2001
'00757	T	3108	1943		BAT 2001
'00760	T	1350	1942	Demo'd	Unsurveyed
'00762	T	9000	1984		BAT 2009
'00763	T	3055	1997		BAT 2009
'00826	T	9000	1942	Demo'd	BAT 2006

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'00828	T	9000	1942		BAT 2008
'00832	T	13048	1942		BAT 2006
'00840	T	9000	1942		BAT 2001
'00842	T	9000	1942		BAT 2003
'00843	T	9000	1942		BAT 2006
'00844	T	9000	1942		BAT 2001
'00845	T	9000	1942		BAT 2006
'00846	T	9000	1942		BAT 2001
'00847	T	10655	1942		BAT 2006
'00849	T	10050	1942		BAT 2006
'00850	T	10452	1942		Advent 1996
'00851	T			per PM - Survey on exception basis only	Unsurveyed
'00853	T	9000	1942	Demo'd	BAT 2003
'00854	T	5411	1967	Demo'd	BAT 2002
'00855	T	9000	1967	Demo'd	BAT 2003
'00857	T	9000	1942	Demo'd	BAT 2003
'00858	T	3808	1942		BAT 2002
'00860	T	55558	1942	Laundry	BAT 2003
'00862	T	9000	1942		BAT 2002
'00863	T	11039	1942		BAT 2002
'00864	T	300	1970		BAT 2002
'00865	T	10691	1942		BAT 2006
'00867	T	10668	1942		BAT 2004
'00868	T	13104	1942		BAT 2002
'00869	T	3076	1942		BAT 2002
'00871	T	6901	1942		BAT 2002
'00873	T	6808	1942		BAT 2002
'00875	T	4061	1942		BAT 2002
'00877	T	3578	1949		BAT 2004
'00882	T	600	1955	Priority	
'00886	T	240	1957		BAT 2006
'00887	T	3120	1966	Priority	
'00888	T	1920	1984	per PM - Survey on exception basis only	Unsurveyed
'00889	T	1920	1984	per PM - Survey on exception basis only	Unsurveyed
'00890	T	4480	1984		BAT 2007
'00892	T	12078	1986		
'00893	T	4000	1986		BAT 2007
'00901	T	N/A	1979	per PM - Survey on exception basis only	Unsurveyed
'00902	T	103928	1985	School	Unsurveyed
'00903	T	1200	1982	School Stg	Unsurveyed
'00904	T	1200	1987	School Stg	Unsurveyed
'00905	T	1200	1986	School Stg	Unsurveyed
'00907	T	9000	1942		BAT 2003
'00908	T	9000	1942		BAT 2002
'00909	T	9000	1942	Storage Bldg.	BAT 2008
'00923	T			Comcast Bldg	BAT 2008
'01000	T	571	2004		BAT 2006
'01043	T	312	1959		BAT 2006
'01108	T	1800	1970	School Stg	Unsurveyed
'01110	T	7822	1992	School Stg	Unsurveyed
'01230	T	312	1960		BAT 2005
'01501	T	32643	1963		BAT 2003
'01502	T	571	2003		BAT 2006
'01565	T	340	1957	Pump House	BAT 2005
'01567	T	1936	1958	Demo'd	BAT 2003
'01568	T	1632	1964	Storage Bldg.	BAT 2005
'01569	T	2800	1985		BAT 2007
'01572	T	1440	1980		BAT 2009
'01576	T	Unknown	Unknown	Not on list, located between 1568 and 1569 & marked	BAT 2007
'01581	T	3484	1975		BAT 2003
'01582	T	8996	1975		BAT 2006
'01583	T	8996	1975		BAT 2003
'01584	T	9195	1975		BAT 2009
'01585	T	6029	1975		BAT 2003
'01595	T	1179	1983		BAT 2009
'01602	T	16	1963		BAT 2006
'01603	T	2100	1975	Storage Bldg.	BAT 2005
'01604	T	126	1970		BAT 2006
'01608	T	168	1990		BAT 2009
'01610	T	34364	2003		BAT 2009
'01746	T	10276	1942		Advent 1996

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'01747	T	12794	2006		BAT 2009
'02104	T	2000	1942		BAT 2005
'02107	T	7528	1942	Demo'd	BAT 2006
'02110	T	2000	1942		BAT 2003
'02112	T	3500	1967		BAT 2003
'02114	T	3500	1967		BAT 2003
'02115	T	86598	1997	School - Lucas	Unsurveyed
'02129	T	2800	1977	Shopette	Advent 1996
'02131	T	5310	1942	Demo'd	BAT 2002
'02133	T	5310	1942	Demo'd	BAT 2003
'02135	T	5310	1942	Demo'd	BAT 2002
'02137	T	5310	1942	Demo'd	BAT 2002
'02152	T	2250	1942	Demo'd	BAT 2008
'02156	T	2500	1943	Demo'd	BAT 2002
'02158	T	2500	1943	Demo'd	BAT 2002
'02159	T	2570	1943		BAT 2002
'02170	T	5310	1942		BAT 2005
'02172	T	5310	1942		BAT 2005
'02174	T	5310	1942		BAT 2006
'02176	T	5310	1942		BAT 2006
'02178	T	5310	1942		BAT 2006
'02180	T	5310	1942		BAT 2003
'02182	T	5310	1942		BAT 2006
'02186	T	5310	1942		BAT 2003
'02188	T	5310	1942		BAT 2006
'02191	T	9352	1948		BAT 2002
'02192	T	1877	1952		BAT 2003
'02193	T	950	1952		BAT 2003
'02194	T	3616	2005	per PM - Survey on exception basis only	Unsurveyed
'02195	T	3616	2005	per PM - Survey on exception basis only	Unsurveyed
'02203	T	1750	1943		BAT 2002
'02204	T	2260	1942		BAT 2002
'02205	T	1263	1942		BAT 2005
'02206	T	1250	1942		BAT 2002
'02207	T	3500	1942		BAT 2006
'02208	T	1250	1942	Demo'd	BAT 2002
'02209	T	2750	1942		BAT 2002
'02250	T	2500	1943		BAT 2002
'02251	T	2625	1943		BAT 2002
'02253	T	2338	1942		BAT 2002
'02255	T	5310	1942		BAT 2002
'02257	T	5310	1942		BAT 2002
'02259	T	3075	1943		BAT 2002
'02261	T	4000	1993		BAT 2007
'02267	T	2995	1943		BAT 2002
'02269	T	2427	1942		BAT 2002
'02270	T	18124	1949	Estep Gym	Advent 1997
'02301	T	3663	1942		BAT 2002
'02303	T	3746	1942		BAT 2002
'02304	T	3500	1967		BAT 2002
'02310	T	5310	1942		BAT 2002
'02312	T	5310	1942		BAT 2002
'02314	T	5310	1942		BAT 2002
'02316	T	5310	1942		BAT 2002
'02318	T	5310	1942		BAT 2002
'02320	T	5310	1942		BAT 2002
'02321	T	Unknown	Unknown		BAT 2008
'02322	T	5310	1942		BAT 2002
'02324	T	5310	1942		BAT 2002
'02325	T	2625	1943	Demo'd	BAT 2006
'02326	T	5310	1942		BAT 2002
'02330	T	5310	1942		BAT 2002
'02332	T	5310	1942		BAT 2002
'02334	T	5310	1942		BAT 2006
'02401	T	1250	1942		BAT 2002
'02402	T	3500	1942		BAT 2002
'02403	T	2160	1943	Demo'd	Unsurveyed
'02404	T	169	1987	per PM - Survey on exception basis only	Unsurveyed
'02427	T	5310	1942	Demo'd	BAT 2002
'02429	T	5310	1942	Demo'd	Unsurveyed
'02430	T	2503	1943		BAT 2002
'02431	T	2560	1943	Demo'd	BAT 2002

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'02432	T	2250	1942		BAT 2005
'02434	T	8750	2005		BAT 2008
'02435	T	3500	1967		BAT 2002
'02436	T	1200	1943		BAT 2002
'02437	T	4800	1994		BAT 2007
'02438	T	2503	1943	Demo'd	BAT 2002
'02439	T	4800	1994		BAT 2007
'02441	T	4800	1994		BAT 2007
'02446	T	2500	1943	Demo'd	BAT 2002
'02448	T	2250	1942	Demo'd	BAT 2002
'02506	T	6490	1943		BAT 2002
'02515	T	5310	1942		BAT 2002
'02516	T	6983	2008		
'02517	T	5310	1942		BAT 2002
'02519	T	5310	1942	Demo'd	BAT 2002
'02523	T	5250	2006		BAT 2008
'02524	T	5044	2008		BAT 2009
'02525	T	4800	1994		BAT 2008
'02526	T	7583	2008		BAT 2009
'02527	T	5310	1942	Demo'd	BAT 2003
'02529	T	5310	1942	Demo'd	BAT 2005
'02530	T	2500	1943		BAT 2002
'02531	T	2500	1943	Demo'd	BAT 2004
'02532	T	2250	1942	Demo'd	BAT 2002
'02533	T	2287	1942	Demo'd	BAT 2002
'02534	T	2248	1942	abatement in progress	BAT 2006
'02535	T	1845	1943	Demo'd	BAT 2002
'02536	T	2573	1943	Demo'd	BAT 2002
'02537	T	2573	1943		BAT 2002
'02538	T	2500	1943	Demo'd	BAT 2002
'02539	T	2500	1943		BAT 2006
'02541	T	1850	1943		BAT 2003
'02543	T	5044	2008		BAT 2009
'02544	T	5250	2006		BAT 2008
'02546	T	2500	1943		BAT 2002
'02548	T	2175	1942	Demo'd	BAT 2002
'02550	T	5310	1942	Demo'd	BAT 2002
'02552	T	5310	1942	Demo'd	BAT 2002
'02554	T	5310	1942	Demo'd	BAT 2002
'02556	T	5400	1942	Demo'd	BAT 2007
'02570	T	1364	1942		BAT 2003
'02571	T	1152	1944		BAT 2008
'02572	T	2016	1954	Demo'd	BAT 2003
'02573	T	2016	1954	Demo'd	BAT 2003
'02574	T	Unknown	Unknown		BAT 2009
'02575	T	8667	1954		BAT 2002
'02577	T	42470	1965	A&B Markings one survey	Advent 1996
'02578	T	Unknown	Unknown		BAT 2009
'02601	T	31386	1971		BAT 2002
'02603	T	23493	1942		BAT 2006
'02604	T	22810	1942		BAT 2002
'02605	T	4070	1942		BAT 2005
'02607	T	3721	1942		BAT 2003
'02613	T	4320	1942	Demo'd	Unsurveyed
'02615	T	2988	1943	Demo'd	BAT 2003
'02617	T	2500	1943	Demo'd	Unsurveyed
'02625	T	2938	1942	Demo'd	Unsurveyed
'02627	T	3150	1942	Demo'd	Unsurveyed
'02632	T	5310	1942	Demo'd	BAT 2002
'02636	T	5310	1942	Demo'd	BAT 2003
'02638	T	5310	1942	Demo'd	Unsurveyed
'02640	T	5310	1942	Demo'd	Unsurveyed
'02642	T	5310	1942	Demo'd	Unsurveyed
'02646	T	5310	1942	Demo'd	BAT 2003
'02647	T	2400	1983	per PM - Survey on exception basis only	Unsurveyed
'02648	T	5412	1942	Demo'd	BAT 2003
'02660	T	4000	1993		BAT 2007
'02699	T	3319	1972		BAT 2003
'02700	T	98904	2007	New HQ	
'02702	K	104978	1976		BAT 2003
'02703	K	6011	1986		BAT 2006
'02704	K	2000	2004		BAT 2007

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'02705	K	3380	2002		BAT 2007
'02715	K	5310	1942	Demo'd	BAT 2002
'02719	K	5310	1942	Demo'd	BAT 2002
'02721	K	5310	1942	Demo'd	BAT 2002
'02723	K	5310	1942	Demo'd	BAT 2002
'02725	K	5310	1942	Demo'd	BAT 2002
'02727	K	5310	1942	Demo'd	BAT 2002
'02737	K	2500	1942		BAT 2006
'02739	K	2750	1942		BAT 2003
'02744	K	5310	1942	Demo'd	BAT 2002
'02745	K	13249	1983	CID	BAT 2008
'02746	K	3000	1942	Demo'd	BAT 2002
'02747	K	12978	2009		
'02762	K	1200	1989	Demo'd	BAT 2009
'02840	K	387338	1993		
'02842	K	42822	1967		Advent 1996
'02902	K	7531	1942		BAT 2003
'02904	K	2750	1942	Demo'd	BAT 2004
'02905	K	2000	1942		BAT 2005
'02906	K	3000	1993		BAT 2007
'02907	K	4800	1942	Demo'd	BAT 2003
'02912	K	4170	1967		BAT 2003
'02931	K	5310	1942		BAT 2003
'02932	K	2950	1942		BAT 2002
'02933	K	5310	1942		BAT 2003
'02934	K	2950	1942		BAT 2002
'02935	K	5310	1942		BAT 2003
'02936	K	3250	1942		BAT 2003
'02937	K	5310	1942		BAT 2003
'02938	K	3250	1942		BAT 2003
'02939	K	3250	1942		BAT 2003
'02941	K	2950	1942		BAT 2003
'02950	K	3783	1942		BAT 2002
'02951	K	2500	1942	Demo'd	BAT 2002
'02989	K	41679	2007		
'02990	K	41679	2007		
'02991	K	21400	2007		
'02992	K	55274	2007	Barracks	
'02993	K	55274	2007	Barracks	
'02994	K	12551	1954		BAT 2009
'02995	K	12551	1954		BAT 2004
'02996	K	12551	1954		BAT 2004
'02997	K	12551	1954		BAT 2002
'03000	K	5952	1976	Shopette	BAT 2003
'03001	K	6621	1993	per PM - Survey on exception basis only	Unsurveyed
'03032	K	3899	1942		BAT 2008
'03065	K	8388	2006	per PM - Survey on exception basis only	Unsurveyed
'03066	K	5250	2007		BAT 2007
'03067	K	8654	2007	Child Occupied	BAT 2007
'03068	K	5000	1988	Child Occupied	BAT 2008
'03069	K	23765	1993	Child Occupied	BAT 2007
'03071	K	23765	1993	Child Occupied	BAT 2009
'03101	K	3746	1942		BAT 2003
'03102	K	1750	1942		BAT 2003
'03103	K	1295	1942	Demo'd	BAT 2002
'03106	K	Unknown	2008		BAT 2009
'03107	K	2250	1942		BAT 2002
'03108	K	Unknown	2008		BAT 2009
'03109	K	4828	1942		BAT 2003
'03110	K	1250	1942	Demo'd	Unsurveyed
'03112	K	3500	1967		BAT 2002
'03201	K	480	1970		BAT 2008
'03202	K	13381	1942		BAT 2002
'03203	K		2009	Child Occupied	
'03204	K	2250	1942		BAT 2003
'03206	K	3746	1942		BAT 2002
'03207	K	2581	1956		BAT 2003
'03208	K	3598	1958		BAT 2003
'03209	K	3598	1958		BAT 2003
'03210	K	2581	1956		BAT 2003
'03211	K	39722	1952		BAT 2003
'03212	K	39722	1952		BAT 2002

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'03213	K	42627	1952		BAT 2002
'03214	K	42627	1952		BAT 2003
'03215	K	39809	1952		BAT 2002
'03216	K	39809	1952		BAT 2003
'03217	K	39722	1952		BAT 2003
'03218	K	39722	1952		Advent 1996
'03301	K	15085	2009		
'03303	K	995	1992	North Sports Complex	BAT 2009
'03304	K	3500	1967		BAT 2003
'03305	K	3500	1967		BAT 2003
'03306	K	4200	1942		BAT 2003
'03307	K	2816	1942		BAT 2002
'03308	K	2252	1942	Demo'd	BAT 2002
'03411	K	20918	1966	SKIES	BAT 2003
'03601	K	7535	1942	Demo'd	BAT 2002
'03603	K	14606	1979		BAT 2007
'03610	K	20618	1978		Advent 1997
'03612	K	8645	2007		BAT 2007
'03660	K			Ballfield - Painted Dugouts	BAT 2009
'03672	K	25241	1986		
'03680	K	15228	1983		
'03686	K	15228	1983		
'03701	K	5250	2006		BAT 2008
'03705	K	224	1969		BAT 2007
'03706	K	4000	1984		
'03707	K	1035	1984		BAT 2007
'03708	K	70768	1954	School	Unsurveyed
'03709	K	92170	1952	School	Unsurveyed
'03710	K	1200	1984	School Stg	Unsurveyed
'03711	K	1200	1986	School Stg	Unsurveyed
'03713	K	44156	1982		BAT 2005
'03717	K	13895	1982		
'03721	K	6673	1983		
'03725	K	44156	1982		BAT 2005
'03730	K	33104	1983		BAT 2005
'03731	K	33275	1982		BAT 2005
'03748	K	33104	1977		BAT 2002
'03750	K	33104	1978		BAT 2002
'03754	K	33284	1978		BAT 2005
'03755	K	15228	1983		
'03759	K	15228	1983		
'03763	K	11856	1977		BAT 2006
'03765	K	15228	1983		
'03766	K	44106	1977		BAT 2002
'03767	K	20234	1977		BAT 2006
'03780	K	9855	1979		
'03781	K	2850	2005	per PM - Survey on exception basis only	Unsurveyed
'03900	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
'03902	K	13045	1977	Steam Plant	BAT 2006
'03904	K	2900	2004	per PM - Survey on exception basis only	Unsurveyed
'03910	K	16264	1984		
'03932	K	20618	1978		Advent 1997
'03933	K	N/A	1992	per PM - Survey on exception basis only	Unsurveyed
'03934	K	11200	1991		
'03958	K	5786	1977		BAT 2003
'03961	K	2850	2005	per PM - Survey on exception basis only	Unsurveyed
'03962	K	9855	1979		
'03968	K	3560	1977		BAT 2003
'04000	K	2900	2004	per PM - Survey on exception basis only	Unsurveyed
'04003	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
'04013	K	15228	1977		BAT 2006
'04017	K	15228	1977		BAT 2003
'04021	K	11856	1977		BAT 2006
'04024	K	33104	1977		BAT 2005
'04025	K	12375	1977		BAT 2006
'04028	K	33104	1977		BAT 2005
'04029	K	20234	1977		BAT 2003
'04033	K	33104	1977		BAT 2005
'04038	K	44156	1977		BAT 2005
'04039	K	33104	1977		BAT 2005
'04044	K	33104	1977		BAT 2005
'04053	K	22053	1977		BAT 2002

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'04054	K	25241	1977		BAT 2003
'04057	K	33104	1977		BAT 2003
'04061	K	16150	1977		Advent 1998
'04062	K	15228	1977		BAT 2006
'04067	K	44106	1977		BAT 2005
'04068	K	15228	1977		BAT 2003
'04099	K	7693	2006	Firehouse	BAT 2009
'04190	K	6153	1985	Shopette	BAT 2009
'04199	K	9520	1960		BAT 2002
'04301	K	3414	1976		BAT 2006
'04858	K	2519	1958	Demo'd	BAT 2006
'04859	K	1513	1975	Demo'd	BAT 2002
'04860	K	1513	1975	Demo'd	BAT 2002
'04899	K	4068	1977	Demo'd	Sverdrup 1994
'04900	K	571	2004		BAT 2007
'04901	K	800	2004		BAT 2007
'05000	K	571	2004		BAT 2006
'05004	K	1687	1991		BAT 2006
'05005	K	40	1994	per PM - Survey on exception basis only	Unsurveyed
'05099	T	864	2008		BAT 2009
'05100	T	Unknown	Unknown	Across from 5123	BAT 2008
'05101	T	Unknown	Unknown		BAT 2009
'05115	T	2945	1943		BAT 2002
'05117	T	2945	1943	Demo'd	BAT 2002
'05121	T	1800	1990		BAT 2008
'05123	T	8208	1943		BAT 2002
'05124	T	9000	1984		BAT 2008
'05125	T	8208	1943		BAT 2002
'05127	T	224	1942		BAT 2008
'05128	T	2921	1986		BAT 2008
'05129	T	800	1989		BAT 2009
'05130	T	1999	1997		BAT 2008
'05131	T	1945	1997		BAT 2008
'05132	T	96	1996		BAT 2008
'05133	T	7000	1998		BAT 2008
'05134	T	7000	1999		BAT 2008
'05135	T	7000	2001		BAT 2008
'05136	T			at PPOC	BAT 2008
'05148	T	3108	1943	Demo'd	Unsurveyed
'05160	T	2924	1987		BAT 2008
'05161	T	2464	1989		BAT 2008
'05201	T	10400	1963		BAT 2003
'05202	T	29300	1964		BAT 2003
'05207	T	169375	1954	Warehouse	BAT 2005
'05209	T	4840	1998		BAT 2008
'05210	T	86708	1954	Warehouse	BAT 2006
'05211	T	185	1969	Religious ED	BAT 2006
'05212	T	2160	1989		BAT 2007
'05213	T	10000	1967	Warehouse	BAT 2006
'05214	T	25920	1968	Warehouse	BAT 2006
'05216	T	30000	1991		BAT 2007
'05217	T	1020	1990		BAT 2007
'05220	T	3200	2001		BAT 2009
'05221	T	5250	1996		BAT 2009
'05222	T	7500	1999		BAT 2009
'05223	T	9000	1984		BAT 2009
'05224	T	5105	1997		BAT 2009
'05225	T	3200	1990		BAT 2009
'05226	T	5106	1997		BAT 2009
'05287	T	600	1995		BAT 2009
'05289	T	4800	1995		BAT 2009
'05290	T	2290	1981		BAT 2009
'05291	T	1161	1986		BAT 2009
'05294	T	1161	1986		BAT 2009
'05300	T	12181	2004	Air Asslt Auto	BAT 2009
'05326	T	3156	1943	Demo'd	BAT 2002
'05328	T	1350	1942	Demo'd	BAT 2002
'05330	T	1000	1943	Demo'd	BAT 2002
'05333	T	1350	1942	Demo'd	BAT 2005
'05334	T	7000	2008		BAT 2009
'05336	T	7000	2008		BAT 2009

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'05338			2008		BAT 2009
'05343	T	Unknown	Unknown	Demo'd	Unsurveyed
'05345	T	Unknown	Unknown	Demo'd	Unsurveyed
'05346	T	2732	1943		BAT 2003
'05348	T	2732	1943	Demo'd	BAT 2003
'05380	T	26460	1989		
'05382	T	8645	2006		BAT 2007
'05399	T			per PM - Survey on exception basis only	Unsurveyed
'05436	T	14960	1942	Demo'd	Unsurveyed
'05437	T	1600	2001		BAT 2007
'05438	T	5250	2000		BAT 2007
'05440	T	5999	1991	School Maint	Unsurveyed
'05441	T	2	1991	School Maint	Unsurveyed
'05442	T	7500	2006		BAT 2008
'05504	T	4046	1994		
'05505	T	99270	1994		
'05506	T	120	1994		BAT 2007
'05507	T	120	1994		BAT 2007
'05508	T	18993	1994	Motor Pool	BAT 2008
'05509	T	494	1994		
'05510	T	3500	1994		
'05511	T	9576	1943	Demo'd	Unsurveyed
'05513	T	10241	1943		BAT 2002
'05514	T	995	1992	South Sports Complex	BAT 2009
'05551	T	2393	1963	Demo'd	BAT 2003
'05552	T	273	1963	Demo'd	BAT 2003
'05580	T	14606	1977		BAT 2003
'05611	T	9770	1943		BAT 2002
'05613	T	10496	1943		BAT 2004
'05638	T	5250	2006		BAT 2008
'05640	T	7036	1997		BAT 2009
'05641	T	7036	1997		BAT 2009
'05646	T	7036	1997		BAT 2008
'05658	T	17630	1986	Gear to Go	BAT 2008
'05660	T	3435	1966	Backdoor Boutique	BAT 2008
'05661	T	22480	1970		BAT 2006
'05662	T	7000	2009		
'05663	T	12204	1962		BAT 2006
'05665	T	800	1982		BAT 2007
'05666	T	Unknown	1961		BAT 2007
'05667	T	3200	1999		BAT 2008
'05668	T	8064	1975		BAT 2006
'05670	T	8064	1972	Demo'd	BAT 2006
'05702	T	14000	1968		BAT 2003
'05705	T	7519	2001	per PM - Survey on exception basis only	BAT 2009
'05710	T	2200	1985		BAT 2006
'05711	K	7600	2006	Behind new HQ	BAT 2008
'05733	T	7700	1985		BAT 2008
'05737	K	7000	2005		BAT 2008
'05740	T	14173	1959		BAT 2003
'05800	K	8750	2006		BAT 2008
'05848	K	1350	1942	Demo'd	BAT 2003
'05855	K	Unknown	1942	Demo'd	Unsurveyed
'05860	K	5000	1994		BAT 2008
'05862	K	7000	2007		BAT 2008
'05875	T	1248	1970		BAT 2003
'05901	K	28800	2009		
'05903	K	7500	2009		
'05905	K	120	2009		
'05908	K	2675	1942	Demo'd	BAT 2002
'05916	K	3376	1942	Demo'd	BAT 2003
'05917	K	Unknown	1942	Demo'd	Unsurveyed
'05918	K	2732	1942	Demo'd	BAT 2002
'05920	K	2732	1942	Demo'd	BAT 2003
'05955	K	Unknown	1942	Demo'd	Unsurveyed
'05962	K	4000	1983	Demo'd	BAT 2007
'05977	K	14160	2006		
'05978	K	761	2000		BAT 2009
'05979	K	74360	2000	Dental Clinic	
'05980	K	12133	1963		BAT 2006
'05982	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
'06001		Unknown	Unknown		BAT 2009

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'06002	T	400	1989		BAT 2009
'06026	T	Unknown	Unknown	New, not on list	BAT 2007
'06050	T	12600	2006		BAT 2008
'06060	T	5250	2007	Angels Road	
'06060	T	Unknown	2009		BAT 2009
'06076	T	7000	2007		
'06077	T	10500	2007		BAT 2007
'06078	T	1800	1998		BAT 2007
'06080	T	7650	1968		BAT 2003
'06081	T	4853	1945		BAT 2002
'06082	T	1139	1986		BAT 2007
'06083	T	3500	2003		BAT 2008
'06084	T	5250	2003		BAT 2008
'06085	T	1804	2002		BAT 2007
'06087	T	10816	1977		BAT 2003
'06088	T	4988	1980		BAT 2008
'06090	K	7538	1994		BAT 2002
'06091	T	324	1969		BAT 2002
'06092	K	693	1989	Demo'd	Unsurveyed
'06093	T	2064	1996		
'06095	K	880	1989		
'06096	K	5120	1968	Warehouse	BAT 2003
'06097	K	5120	1968	Warehouse	BAT 2003
'06098	K	5120	1968	Warehouse	BAT 2003
'06099	K	5939	1968	Warehouse	BAT 2009
'06101	K	1072	2008	Tennesee Ave.	
'06102	K	46212	2008	Tennesee Ave.	
'06106	K	119900	2009	Tennesee Ave.	
'06118	K	7037	1996		BAT 2007
'06129	K	7036	1996		BAT 2007
'06139	K	2686	1958		BAT 2003
'06140	K	3867	1958		BAT 2003
'06142	K	2339	1960	Demo'd	BAT 2003
'06143	K	64	1960	Demo'd	BAT 2003
'06144	K	Unknown	Unknown	Not on list, on map	BAT 2003
'06145	K	23450	1974		BAT 2003
'06146	K	4800	1999		BAT 2008
'06202	K	5250	2006		BAT 2008
'06203	K	151	1958		BAT 2003
'06205	K	Unknown	1958	Grease Rack	BAT 2006
'06222	K	8208	1942		BAT 2003
'06225	K	60174	1990		BAT 2006
'06226	K	120	1990	per PM - Survey on exception basis only	Unsurveyed
'06234	K	7970	1990		BAT 2009
'06240	K	5451	1991		BAT 2009
'06241	K	6851	1991		BAT 2009
'06247	K	17190	1991		BAT 2009
'06248	K	9598	1991		BAT 2009
'06249	K	120	1991	per PM - Survey on exception basis only	Unsurveyed
'06250	K	17329	2003		BAT 2009
'06251	K	8426	2003		BAT 2009
'06254	K	9338	1954		Advent 1997
'06256	K	5284	1954	Motor Pool	BAT 2003
'06257	K	4808	1954	Motor Pool	BAT 2003
'06258	K	12438	1971	Motor Pool	BAT 2003
'06266	K	192	1958		BAT 2005
'06268	K	151	1958	Motor Pool	BAT 2006
'06302	K	5615	1978		BAT 2005
'06303	K	124	1958	Motor Pool	BAT 2003
'06304	K	5385	1978		BAT 2004
'06306	K	5615	1978		BAT 2006
'06308	K	5385	1978		BAT 2006
'06310	K	7037	1997		BAT 2008
'06311	K	Unknown	1978		BAT 2006
'06312	K	6182	1978		BAT 2005
'06314	K	6182	1978		BAT 2005
'06316	K	6182	1978		BAT 2004
'06318	K	6182	1978		BAT 2005
'06327	K	192	1978		BAT 2005
'06329	K	192	1978		BAT 2008
'06390	K	12792	1985		BAT 2009
'06391	K	3106	1994	per PM - Survey on exception basis only	Unsurveyed

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'06419	K	7037	1997		BAT 2008
'06421	K	6898	1997		BAT 2008
'06426	K	10944	1942	Demo'd	Unsurveyed
'06446	K	9576	1942	Demo'd	BAT 2006
'06448	K	9576	1942	Demo'd	BAT 2006
'06454	K	10000	1963		BAT 2002
'06456	K	10000	1942		BAT 2002
'06460	K	10000	1963		BAT 2002
'06464	K	10000	1963		BAT 2002
'06468	K	10000	1963		BAT 2003
'06470	K	10000	1963		BAT 2002
'06474	K	10000	1963		BAT 2003
'06476	K	8750	2005		BAT 2008
'06477	K	8750	2005		BAT 2008
'06484	K	5250	2008	Desert Storm Ave.	
'06485	K	5250	2008		BAT 2008
'06486	K	2000	1994		BAT 2002
'06488	K	21623	1994		BAT 2002
'06489	K	9052	1994		BAT 2002
'06490	K	600	1985		BAT 2006
'06492	K	7037	1998		BAT 2008
'06494	K	7037	1998		BAT 2008
'06498	K	3750	1993		
'06502	K	5615	1978		BAT 2006
'06504	K	5385	1978		BAT 2006
'06506	K	5615	1978		BAT 2006
'06508	K	5385	1978		BAT 2006
'06511	K	Unknown	1978		BAT 2005
'06512	K	6182	1978		BAT 2005
'06514	K	6182	1978		BAT 2005
'06516	K	6182	1978		BAT 2005
'06518	K	6182	1978		BAT 2005
'06521	K	25000	2003		
'06522	K	8500	2003		
'06523	K	Unknown	1978		BAT 2006
'06524	K	3500	2003		
'06525	K	25000	2003		
'06527	K	192	1978		BAT 2006
'06529	K	192	1978		BAT 2009
'06529	K				BAT 2009
'06530	K	2558	1986		BAT 2009
'06531	K	460	1985		BAT 2009
'06532	K	231	1986		BAT 2009
'06533	K	2688	1985		BAT 2009
'06535	K	21745	1985		BAT 2009
'06536	K	84	1985		BAT 2007
'06538	K	713	1985		BAT 2007
'06545	K	Unknown	2008		BAT 2009
'06548	K	10944	1990		BAT 2009
'06551	K	16758	1981		
'06555	K	18377	1984		
'06559	K	31415	1985		
'06563	K	19121	1987		
'06565	K	305	1997	per PM - Survey on exception basis only	Unsurveyed
'06601	T	4320	1959	Barn	BAT 2006
'06602	T	4356	1959	Barn	BAT 2004
'06603	T	3000	1981		BAT 2006
'06604	T	2000	1964	Bunker	BAT 2005
'06605	T	2000	1964	Bunker	BAT 2006
'06606	T	2000	1964	Bunker	BAT 2005
'06607	T	2000	1964	Bunker	BAT 2006
'06608	T	2000	1964	Bunker	BAT 2005
'06609	T	2000	1964	Bunker	BAT 2006
'06610	T	2000	1964	Bunker	BAT 2006
'06611	T	2000	1964	Bunker	BAT 2006
'06612	T	144	1943	Pumping Station	BAT 2004
'06613	T	3456	1990		BAT 2009
'06614	T	1260	1973		BAT 2006
'06615	T	800	1943		BAT 2002
'06616	T	400	1990		BAT 2009
'06617	T	10800	1973		BAT 2006
'06618	T	4752	1991		BAT 2006

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'06619	T	6000	1975	Barn	BAT 2005
'06620	T	515	1978		BAT 2002
'06621	T	2800	1980		BAT 2009
'06622	T	153	1976		BAT 2006
'06623	T	Unknown	1976		BAT 2005
'06624	T	261	1976		BAT 2005
'06625	T	3565	1981		BAT 2006
'06626	T	3565	1981		BAT 2009
'06627	T	30235	1991		
'06628	T	9000	1976		BAT 2006
'06629	T	4800	1989		
'06633	T	16062	1994		
'06634	T	3546	1976		BAT 2003
'06635	T	4000	1989		BAT 2007
'06636	T	63721	1987		
'06637	T	4800	1989		BAT 2007
'06638	T	1056	2002		
'06639	T	7487	1996	Air Field Tower	BAT 2007
'06643	T	96	1976	Pump house	BAT 2005
'06644	T	1200	2009		
'06645	T	2944	1983		BAT 2008
'06646	T	1560	1984		BAT 2009
'06647	T	1701	1976		BAT 2007
'06648	T	10430	1999		BAT 2009
'06649	T	4000	2000		BAT 2009
'06650	T	4000	2000		BAT 2009
'06651	T	4000	2000		BAT 2009
'06656	T	600	1995		BAT 2009
'06657	T	820	1973	Cabin	BAT 2003
'06691	T	36	1952	Demo'd	Unsurveyed
'06693	T	100	1955	Fire Tower	BAT 2004
'06694	T	100	1955	Fire Tower	BAT 2004
'06695	T	600	1998		BAT 2009
'06699	T	100	1976	Demo'd	BAT 2008
'06708	T	2581	1965	Demo'd	BAT 2002
'06709	T	38145	1954	Demo'd	BAT 2003
'06710	T	38406	1954	Demo'd	BAT 2002
'06711	T	38329	1954	Demo'd	BAT 2002
'06712	T	38285	1954	Demo'd	BAT 2002
'06713	T	3610	1958	Demo'd	BAT 2002
'06715	T	18902	1954	Demo'd	BAT 2002
'06717	T	2581	1955	Demo'd	BAT 2002
'06718	T	31869	1954	Demo'd	BAT 2002
'06719	T	31779	1954	Demo'd	BAT 2002
'06720	T	4892	1955	Demo'd	BAT 2002
'06721	T	7714	1958	Chapel	BAT 2003
'06722	T	3867	1958	Demo'd	BAT 2002
'06723	T	3610	1958	Demo'd	BAT 2002
'06727	T	38312	1954	Demo'd	BAT 2002
'06729	T	3610	1958		BAT 2002
'06730	T	38138	1954		BAT 2002
'06731	T	43509	1954		BAT 2002
'06732	T	38442	1954		BAT 2002
'06733	T	37977	1954		BAT 2002
'06734	T	3610	1958		BAT 2002
'06735	T	2746	1955		BAT 2002
'06736	T	2581	1965		BAT 2002
'06741	T	18472	2006		
'06742	T	15561	2006		
'06743	T	9373	2006		
'06744	T	23980	2006		
'06745	T	15561	2006		
'06746	T	15561	2006		
'06747	T	44270	2006		
'06748	T	45235	2006		
'06749	T	10472	2005		
'06750	T	10966	2005		
'06751	T	5000	2004		BAT 2009
'06752	T	71918	2006		
'06753	T	51512	2005		
'06754	T	54900	2005		
'06755	T	10996	2006		

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'06756	T	66586	2007		
'06757	T	5250	2006		BAT 2008
'06758	T	2850	2005		BAT 2008
'06759	T	6198	2001		BAT 2008
'06760	T	15142	2001		BAT 2008
'06761	T	20494	2001		
'06762	T	93516	2001		
'06763	T	125066	2000		
'06764	T	125066	2000		
'06765	T	14284	1999		
'06766	T	38647	1999		
'06767	T	14284	1999		
'06768	T	38647	2001		
'06769	T	17144	2001		
'06770	T	38647	2001		
'06771	T	45293	2008		
'06772	T	41308	2008		
'06773	T	45293.33	2008		
'06800	T	2900	2004	per PM - Survey on exception basis only	Unsurveyed
'06801	T	32652	1954		BAT 2003
'06801	T	32652	1954		BAT 2006
'06802	T	120	1991		BAT 2006
'06803	T	100	1955	Demo'd	BAT 2003
'06804	T	5217	1954	Motor Pool	BAT 2006
'06806	T	Unknown	1958		BAT 2006
'06808	T	4752	1963	Motor Pool	BAT 2006
'06809	T	151	1958	Motor Pool	BAT 2006
'06810	T	124	1958	Motor Pool	BAT 2006
'06811	T	151	1958	Motor Pool	BAT 2006
'06812	T	192	1958	Motor Pool	BAT 2004
'06817	T	151	1958	Motor Pool	BAT 2005
'06818	T	124	1958	Motor Pool	BAT 2006
'06819	T	151	1958	Motor Pool	BAT 2005
'06820	T	2800	2004	per PM - Survey on exception basis only	Unsurveyed
'06821	T	192	1954	Motor Pool	BAT 2006
'06823	K	Unknown	1958		BAT 2005
'06827	T	120	1997	Demo'd	Unsurveyed
'06828	T	34155	1997	Motor Pool	
'06829	T	6300	1997	per PM - Survey on exception basis only	Unsurveyed
'06830	T	120	2000	per PM - Survey on exception basis only	Unsurveyed
'06832	T	7000	2000	per PM - Survey on exception basis only	Unsurveyed
'06833	T	12975	2000	Demo'd	Unsurveyed
'06835	T	120	2000	per PM - Survey on exception basis only	Unsurveyed
'06836	T	12506	2000	Demo'd	Unsurveyed
'06837	T	6300	2000	per PM - Survey on exception basis only	Unsurveyed
'06838	T	21417	2000		BAT 2007
'06839	T	336	2005		BAT 2009
'06840	T	5250	2006		BAT 2009
'06841	T	5250	2006		BAT 2009
'06842	T	5250	2006		BAT 2009
'06843	T	5284	1954	Motor Pool	BAT 2004
'06844	T	4748	1954	Motor Pool	BAT 2005
'06845	K	7500	2008		
'06846	T	192	1954	Motor Pool	BAT 2005
'06847	T	5105	1954	Motor Pool	BAT 2005
'06849	T	5217	1954	Motor Pool	BAT 2005
'06850	T	4748	1954	Motor Pool	BAT 2003
'06851	T	3000	2003	per PM - Survey on exception basis only	Unsurveyed
'06852	T	1408	2003		BAT 2008
'06853	T	5250	2003		BAT 2008
'06854	T	3500	2003		BAT 2008
'06855	T	1408	2003		BAT 2008
'06856	T	5250	2004		BAT 2008
'06870	T	120	1987	per PM - Survey on exception basis only	Unsurveyed
'06871	T	7000	2007		BAT 2008
'06874	T	29017	1987		BAT 2008
'06876	T	Unknown	Unknown		BAT 2009
'06878	T	Unknown	Unknown		BAT 2009
'06879	T	8698	1999		BAT 2009
'06880	T	1764	1987	Grease Rack	BAT 2009
'06881	T	120	1987	per PM - Survey on exception basis only	Unsurveyed
'06883	T	21980	1999		

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'06884	T	1040	1987		BAT 2009
'06885	T	Unknown	1996	Air Assault Tower	BAT 2003
'06886	T	5600	1987		
'06887	T	10248	1987		BAT 2009
'06888	T	3500	1994		
'06889	T	199	1994	per PM - Survey on exception basis only	Unsurveyed
'06890	T	29792	1994		
'06891	T	120	1994	Demo'd	Unsurveyed
'06892	T	30130	1994		
'06893	T	120	1994	per PM - Survey on exception basis only	Unsurveyed
'06894	T	7000	2002	Demo'd	Unsurveyed
'06895	T	5250	2004	Demo'd	Unsurveyed
'06896	T	80475	2009		
'06897	T	328	2009		
'06898	T	400	1999		BAT 2009
'06899	T	800	1999	per PM - Survey on exception basis only	Unsurveyed
'06901	T	9303	1954		BAT 2002
'06902	T	3867	1958		BAT 2003
'06903	T	2686	1958		BAT 2003
'06904	T	2581	1965		BAT 2003
'06905	T	2581	1965		BAT 2003
'06906	T	2581	1965		BAT 2003
'06907	K	2581	1965		BAT 2003
'06908	K	2581	1965		BAT 2003
'06909	T	31758	1954		BAT 2004
'06910	T	38089	1954		BAT 2004
'06911	T	38280	1954		BAT 2004
'06912	T	38310	1954		BAT 2005
'06913	T	2581	1958		BAT 2003
'06914	T	3610	1958		BAT 2003
'06915	T	3610	1958		BAT 2002
'06916	T	2581	1958		BAT 2002
'06917	T	38480	1956		BAT 2002
'06918	T	38646	1956		BAT 2002
'06919	K	38711	1956		BAT 2001
'06920	K	38649	1956		BAT 2001
'06921	K	38512	1956		Bate 2000
'06921	K	1470	1976		BAT 2003
'06922	K	38691	1956		BAT 2003
'06923	K	38465	1956		BAT 2003
'06924	K	2581	1963		BAT 2003
'06925	K	3610	1958		BAT 2003
'06926	K	2581	1956		BAT 2003
'06927	K	38118	1954		BAT 2005
'06928	K	38120	1954		BAT 2005
'06929	K	38281	1954		BAT 2005
'06930	K	38196	1954		BAT 2005
'06931	K	31713	1954		BAT 2005
'06932	K	2581	1956		BAT 2003
'06933	K	3610	1958		BAT 2003
'06934	K	3610	1958		BAT 2003
'06935	K	2581	1956		BAT 2003
'06936	K	31735	1954		BAT 2005
'06937	K	37900	1954		BAT 2005
'06938	K	38039	1954		BAT 2005
'06939	K	38137	1954		Advent 1999
'06940	K	38127	1954		BAT 2002
'06942	K	38098	1954		BAT 2005
'06943	K	38049	1954		BAT 2003
'06944	K	38063	1954		BAT 2003
'06945	K	15000	1954	Priority	
'06945	K	31685	1954		BAT 2005
'06989	T	14900	1996		BAT 2009
'06990	T	20618	1974		Advent 1997
'06991	T	3688	1978		BAT 2003
'06992	K	20618	1974		Advent 1997
'06993	T	3688	1978		BAT 2003
'06995	T	3688	1978		BAT 2003
'06997	K	7135	1978		BAT 2003
'07000	K	2900	2004	per PM - Survey on exception basis only	Unsurveyed
'07001	K	2850	2005	per PM - Survey on exception basis only	Unsurveyed
'07004	T	700	1969	Steam Plant	BAT 2005

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'07005	T	4748	1954	Motor Pool	BAT 2006
'07006	T	5215	1958	Motor Pool	BAT 2006
'07007	T	120	1958		BAT 2004
'07008	T	2828	1956	Steam Plant	BAT 2005
'07009	T	192	1958	Motor Pool	BAT 2006
'07010	T	143	1958		BAT 2007
'07012	T	151	1958	Steam Plant	BAT 2005
'07013	T	Unknown	1958	Pump house	BAT 2005
'07014	T	2280	1958	Grease Rack	BAT 2006
'07029	K	571	2004		BAT 2009
'07031	K	5210	2007		BAT 2009
'07033	K	5250	2005		BAT 2007
'07034	K	Unknown	Unknown		BAT 2008
'07035	K	2700	1986		BAT 2007
'07036	K	5250	2005		BAT 2008
'07037	K	37458	2004		BAT 2009
'07038	K	126841	2004		
'07039	K	126841	2002		
'07042	K	4808	1954	Motor Pool	BAT 2007
'07043	K	4748	1958	Motor Pool	BAT 2004
'07044	K	126841	2002		
'07045	K	151	1958	Motor Pool	BAT 2006
'07047	K	5077	1967	Motor Pool	BAT 2005
'07048	K	20601	2002		
'07049	K	5217	1954		BAT 2007
'07050	K	4808	1954	Motor Pool	BAT 2006
'07051	K	124	1958		BAT 2007
'07052	K	3779	2002		
'07053	K	151	1958	Motor Pool	BAT 2006
'07055	K	151	1958	Motor Pool	BAT 2006
'07057	K	Unknown	1967	Demo'd	Unsurveyed
'07060	K	3538	1986		BAT 2007
'07061	K	728	1986		BAT 2007
'07062	K	21424	1986		BAT 2007
'07063	K	5250	2006		BAT 2008
'07064	K	1764	1986	Grease Rack	BAT 2008
'07065	K	96	1996		BAT 2006
'07066	K	1764	1986	per PM - Survey on exception basis only	Unsurveyed
'07068	K	1764	1986	Grease Rack	
'07069	K	36800	2004		
'07070	K	1764	1986	Grease Rack	
'07071	K	14284	2004		
'07072	K	120	1986	Demo'd	Unsurveyed
'07073	K	22733	2004		
'07074	K	5250	2005		BAT 2007
'07075	K	61419	2002		
'07076	K	14284	2002		
'07077	K	14284	2002		
'07078	K	13347	2002		
'07079	K	24455	2002		
'07080	K	120	1986	Demo'd	Unsurveyed
'07081	K	14284	2002		
'07082	K	24445	2002		
'07083	K	120	1985	No suspect coating	BAT 2007
'07084	K	14284	2002		
'07085	K	17418	1985		BAT 2007
'07086	K	24445	2002		
'07087	K	560	1985		BAT 2007
'07088	K	1764	1985	Grease Rack	BAT 2007
'07089	K	1764	1985		BAT 2007
'07090	K	120	1985	No suspect coating	BAT 2007
'07092	K	2800	1985		BAT 2007
'07093	K	2800	1985		BAT 2007
'07094	K	111448	1996		
'07095	K	14116	1996		
'07096	K	99706	1997		
'07097	K	10398	1996		
'07098	K	10399	1996		
'07099	K	10399	1996		
'07100	K	144	1996		BAT 2008
'07106	K	10398	1997		
'07107	K	10396	1997		

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'07108	K	1684	1993		BAT 2008
'07109	K	240	1978	per PM - Survey on exception basis only	Unsurveyed
'07110	K	23628	1969		BAT 2009
'07111	K	21398	1996		
'07112	K	25625	1969		BAT 2009
'07113	K	14729	1996		
'07114	K	7173	1969		BAT 2003
'07116	K	6909	1959		BAT 2003
'07117	K	3401	1997		
'07118	K	25625	1959		BAT 2002
'07119	K	9597	1997		
'07120	K	25625	1959		BAT 2005
'07121	K	3440	1994		BAT 2008
'07122	K			per PM - Survey on exception basis only	Unsurveyed
'07123	K	22750	1996		
'07124	K	27287	1997		
'07125	K	10800	1996		
'07126	K	10830	1996		
'07127	K	12950	1997		
'07128	K	6570	1998		
'07129	K	8743	1993		BAT 2008
'07130	K	10200	1986		BAT 2008
'07131	K	15404	1978		BAT 2003
'07132	K	6550	1985		BAT 2007
'07133	K	10269	1978		BAT 2003
'07134	K	8742	1993		BAT 2008
'07135	K	2390	2005		
'07137	K	3840	1965		BAT 2003
'07138	K	4170	1997		BAT 2008
'07139	K	8875	2004		BAT 2008
'07140	K	414	1987		BAT 2003
'07141	K	5389	1967	Motor Pool	BAT 2004
'07142	K	5200	1985		BAT 2008
'07143	K	5250	1999		BAT 2008
'07144	K	5200	1985		BAT 2008
'07145	K	2581	1956		BAT 2003
'07146	K	36675	2002		
'07147	K	2880	2002		BAT 2008
'07148	K	14284	2004		
'07149	K	9248	1974		BAT 2003
'07150	K	9237	1971		BAT 2003
'07151	K	2800	2005	per PM - Survey on exception basis only	Unsurveyed
'07152	K	20511	1963	Hanger	BAT 2003
'07153	K	1200	1963		BAT 2006
'07154	K	36677	1963	Hanger	BAT 2003
'07155	K	4518	1963		BAT 2002
'07156	K	34785	1963	Hanger	BAT 2003
'07157	K	6649	1971		BAT 2003
'07158	K	100	1993		BAT 2007
'07159	K	4259	1967		BAT 2003
'07160	K	12516	1959		BAT 2002
'07161	K	11218	1963	Hanger	BAT 2003
'07161	K	12125	1963	Hanger	BAT 2006
'07162	K	74000	2004		BAT 2008
'07163	K	11756	1975		BAT 2003
'07163	K	11756	1975		BAT 2006
'07164	K	3105	1956		BAT 2003
'07165	K	954	1981		BAT 2008
'07166	K	2400	1998		BAT 2008
'07167	K	1881	1959		BAT 2005
'07168	K	1504	1953		BAT 2006
'07169	K	1881	1959		BAT 2006
'07170	K	8400	1967		BAT 2003
'07171	K	1018	1967	Demo'd	BAT 2006
'07172	K	336	1965	Shack	BAT 2005
'07173	K	4000	1965		BAT 2003
'07175	K	1018	1967	Demo'd	BAT 2006
'07176	K	3230	1983		BAT 2008
'07177	K	5512	1965		BAT 2003
'07178	K	120	1983		BAT 2008
'07179	K	9300	1965		BAT 2003
'07180	K	172	1994	per PM - Survey on exception basis only	Unsurveyed

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'07181	K	4080	1969	Demo'd	BAT 2006
'07183	K	Unknown	1998		BAT 2007
'07184	K	1408	2004		BAT 2007
'07185	K	5974	2004	Demo'd	Unsurveyed
'07186	K	22326	2004		
'07187	K	1734	1959		BAT 2003
'07188	K	5519	1993		BAT 2007
'07189	K	5520	1993		BAT 2007
'07191	K	13524	1996		BAT 2008
'07192	K	3500	2004		BAT 2008
'07193	K	13440	2004		BAT 2008
'07194	K	7000	2004		BAT 2008
'07195	K	10500	2008		
'07196	K	8750	2004		BAT 2008
'07197	K	571	2004		BAT 2008
'07198	K	1920	2004		BAT 2008
'07199	K	2553	2004		BAT 2008
'07200	K	Unknown	Unknown		BAT 2008
'07201	K	186	1975	Receiver Bldg.	BAT 2005
'07202	K	1392	1959		BAT 2003
'07203	K	441	1989		BAT 2008
'07205	K	Unknown	1974	Pump house	BAT 2005
'07206	K	24178	1974		BAT 2006
'07208	K	41912	1974		BAT 2003
'07210	K	32611	1974		BAT 2006
'07211	K	5200	1985		BAT 2008
'07212	K	1849	1975		BAT 2003
'07213	K	5231	1985		BAT 2008
'07214	K	41860	1974		BAT 2003
'07215	K	5200	1985		BAT 2008
'07216	K	Unknown	1985	per PM - Survey on exception basis only	Unsurveyed
'07218	K	41860	1974		BAT 2004
'07219	K	Unknown	1974		BAT 2003
'07220	K	10500	2007		
'07221	K	536	1974		BAT 2006
'07222	K	300	2003		
'07223	K	2530	1974		BAT 2006
'07224	K	19300	2003		
'07225	K	5200	1985		BAT 2008
'07226	K	10200	2003		
'07230	K	200	1974		BAT 2008
'07236	K	2430	1965	Demo'd	Unsurveyed
'07238	K	100	1999	Guard Shack	
'07239	K	5005	1999		
'07240	K	5200	1987		BAT 2008
'07241	K	4556	1975		BAT 2003
'07242	K	3000	1993		BAT 2008
'07243	K	41117	1991		
'07244	K	44578	1999		BAT 2009
'07245	K	49139	1975	Priority	
'07246	K	4200	1997		
'07249	K	49369	1975		BAT 2008
'07250	K	48	1997	per PM - Survey on exception basis only	Unsurveyed
'07251	K	41117	1991		
'07252	K	3943	1996		
'07253	K	3943	1996		
'07254	K	1054	2000		BAT 2008
'07255	K	2122	2002		BAT 2009
'07256	K	10875	2005		
'07258	K	10320	2008		
'07259	K	27954	2007		
'07261	K	4648	1999		
'07262	K	69243	1992		
'07263	K	4674	1994		BAT 2009
'07264	K	60000	1990		
'07265	K	4232	1997		
'07266	K	970	1990	per PM - Survey on exception basis only	Unsurveyed
'07267	K	19441	1993		
'07268	K	60400	1990		
'07269	K	25500	2004		
'07270	K	1711	1988	per PM - Survey on exception basis only	Unsurveyed
'07272	K	38968	1988		

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'07273	K	4987	1993		
'07274	K	85410	2001		
'07275	K	5200	1994		
'07276	K	12486	1995		
'07277	K	22033	1994		
'07278	K	12487	1995		
'07279	K	5057	1994		
'07280	K	4507	1993		
'07281	K	11270	1992		
'07282	K	4523	1995		
'07283	K	4524	1995		
'07284	K	1495	2000		
'07285	K	5684	1993		
'07286	K	5683	1996		
'07287	K	5684	1996		
'07288	K	5684	1996		
'07289	K	5683	1993		
'07290	K	5683	1996		
'07292	K	4075	2004		
'07293	K	368	1959		BAT 2005
'07294	K	72	1993		
'07297	K	159	1959		BAT 2005
'07298	K	3985	1997	Wash Rack	
'07299	K	3939	1996		
'07347	T	1198	1969		BAT 2006
'07352	T	1864	1942	Demo'd	BAT 2006
'07388	T	96	1962	Demo'd	Unsurveyed
'07476	T	Unknown	2004		BAT 2006
'07477	T	1920	2004		BAT 2009
'07501	T	Unknown	2004		BAT 2007
'07502	T	1227	1951		BAT 2003
'07503	T	688	1951		BAT 2005
'07504	T	5996	1951		BAT 2003
'07509	T	775	1995		BAT 2008
'07510	T	14280	1957		BAT 2003
'07514	T	4064	1957		BAT 2003
'07520	T	5904	1957		BAT 2004
'07523	T	62638	1950		Advent 1995
'07524	T	800	1994		
'07526	T	5655	1950		BAT 2005
'07527	T	5980	1950		BAT 2004
'07540	T	11574	1955		BAT 2003
'07541	T	8908	1953		BAT 2004
'07542	T	1170	1955		BAT 2005
'07543	T	998	1960		BAT 2003
'07546	T	980	1965		BAT 2005
'07549	T	336	2005		BAT 2009
'07562	T	1800	1954		BAT 2004
'07563	T	1026	1953		BAT 2004
'07565	T	1008	1960		BAT 2005
'07572	T	6900	1950	Demo'd	BAT 2003
'07573	T	4060	1950		BAT 2005
'07574	T	325	1950		BAT 2005
'07575	T	7037	1997		
'07580	T	12550	1956		BAT 2005
'07603	T	2980	1950	Demo'd	BAT 2008
'07604	T	5620	1950		Advent 1996
'07605	T	80	1950		BAT 2005
'07606	T	718	1951		Advent 1995
'07607	T	1200	1950		Advent 1997
'07608	T	592	1951		BAT 2005
'07609	T	1440	1950		BAT 2006
'07611	T	3360	1951		BAT 2006
'07612	T	Unknown	Unknown	Not on list, on map	BAT 2007
'07613	T	5250	2005		BAT 2007
'07620	T	4430	1952		BAT 2003
'07621	T	4430	1952		BAT 2003
'07626	T	800	1953		BAT 2006
'07630	T	288	1954		BAT 2006
'07631	T	2400	2007		
'07635	T	Unknown	1943	Pump house	BAT 2003
'07700	T	4086	1950	Bunker	BAT 2006

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'07702	T	3411	1950	Bunker	BAT 2004
'07703	T	64	1952		BAT 2007
'07704	T	3358	1950	Priority	
'07705	T	36	1952	Demo'd	BAT 2007
'07706	T	4180	1950	Bunker	BAT 2007
'07707	T	49	1952		BAT 2007
'07708	T	4958	1950	Bunker	BAT 2006
'07709	T	154	1950	per PM - Survey on exception basis only	Unsurveyed
'07710	T	3099	1950	Bunker	BAT 2006
'07711	T	154	1950	per PM - Survey on exception basis only	Unsurveyed
'07712	T	2798	1952		BAT 2007
'07714	T	3657	1950	Bunker	BAT 2006
'07715	T	53	1950	per PM - Survey on exception basis only	Unsurveyed
'07716	T	3543	1950	Bunker	BAT 2008
'07718	T	3657	1950	Bunker	BAT 2004
'07720	T	4383	1950	Bunker	BAT 2004
'07721	T	49	1954		BAT 2007
'07722	T	3874	1952		BAT 2008
'07723	T	49	1954		BAT 2007
'07724	T	921	1954	Bunker	BAT 2008
'07725	T	49	1952		BAT 2008
'07726	T	3465	1950	Bunker	BAT 2006
'07727	T	36	1952		BAT 2007
'07728	T	4912	1950	Bunker	BAT 2008
'07729	T	Unknown	Unknown		BAT 2007
'07731	T	49	1952		BAT 2007
'07732	T	4549	1950	Bunker	BAT 2008
'07733	T	36	1952		BAT 2007
'07734	T	3248	1950	Bunker	BAT 2006
'07735	T	1024	1976	Bunker	BAT 2005
'07736	T	3590	1950	Bunker	BAT 2006
'07738	T	3590	1950	Bunker	BAT 2006
'07739	T	36	1952	Demo'd	BAT 2007
'07740	T	10655	1950	Radon Hazard	Unsurveyed
'07742	T	2796	1950	Bunker	BAT 2007
'07744	T	3749	1950	Bunker	BAT 2006
'07746	T	3350	1950	Bunker	BAT 2006
'07747	T	49	1952		BAT 2007
'07748	T	3174	1950	Bunker	BAT 2008
'07749	T	49	1952		BAT 2007
'07750	T	3599	1950	Bunker	BAT 2008
'07751	T	36	1952		BAT 2007
'07752	T	2970	1950	Bunker	BAT 2008
'07753	T	52	1950	per PM - Survey on exception basis only	Unsurveyed
'07811	T	22835	1961		BAT 2003
'07812	T	1920	1957		BAT 2005
'07813	T	100	1966		BAT 2006
'07814	T	2108	1953		BAT 2004
'07819	T	7750	1997		BAT 2007
'07820	T	3224	1953		BAT 2004
'07821	T	540	1981		BAT 2004
'07824	T	144	1999		BAT 2007
'07825	T	15111	1961		BAT 2003
'07830	T	2353	1952		BAT 2003
'07831	T	36	1952		BAT 2003
'07832	T	1930	1953		BAT 2005
'07833	T	8804	1953		BAT 2003
'07834	T	13459	1949		BAT 2003
'07835	T	2108	1952		BAT 2003
'07843	T	1440	1950		BAT 2006
'07845	T	274	1949		BAT 2006
'07847	T	336	1949	Asbestos Hazard	Unsurveyed
'07851	T	1089	1951		BAT 2004
'07854	T	7700	1986		BAT 2008
'07855	T	10815	1951		BAT 2003
'07856	T	9607	1952		BAT 2004
'07857	T	9618	1967		BAT 2006
'07858	T	4284	1957		BAT 2003
'07860	T	2171	1954		BAT 2003
'07861	T	2171	1954		BAT 2006
'07862	T	2171	1954		BAT 2003
'07863	T	2171	1954		BAT 2006

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'07865	T	2171	1954		BAT 2003
'07871	T	1698	1952		BAT 2003
'07872	T	787	1957		BAT 2003
'07873	T	1746	1949		BAT 2006
'07874	T	3012	1952		BAT 2003
'07876	T	49	1954	Priority	
'07877	T	2472	1954		BAT 2006
'07878	T	49	1954	per PM - Survey on exception basis only	Unsurveyed
'07882	T	7174	1949		BAT 2004
'07884	T	290	1966		BAT 2006
'07900	T	2392	1951	Demo'd	BAT 2006
'07901	T	2391	1951	Demo'd	BAT 2006
'07902	T	2391	1951	Demo'd	BAT 2006
'07903	T	2391	1951	Demo'd	BAT 2006
'07904	T	2391	1951	Demo'd	BAT 2006
'07905	T	2391	1951	Demo'd	BAT 2006
'07906	T	2391	1951	Demo'd	BAT 2006
'07907	T	2391	1951	Demo'd	BAT 2006
'07908	T	2387	1951	Demo'd	BAT 2006
'07909	T	2387	1951	Demo'd	BAT 2006
'07910	T	2387	1951	Demo'd	BAT 2006
'07911	T	31549	2009		
'07911	T	1865	1951	Demo'd	BAT 2006
'07912	T	2393	1951	Demo'd	BAT 2006
'07913	T	2387	1951	Demo'd	BAT 2006
'07914	T	2391	1951	Demo'd	BAT 2006
'07915	T	2391	1951	Demo'd	BAT 2006
'07916	T	2391	1951	Demo'd	Unsurveyed
'07917	T	2397	1951	Demo'd	BAT 2006
'07918	T	2395	1951	Demo'd	BAT 2006
'07919	T	2392	1951	Demo'd	BAT 2006
'07920	T	2395	1951	Demo'd	BAT 2006
'07921	T	2387	1951	Demo'd	Unsurveyed
'07922	T	2399	1951	Demo'd	BAT 2006
'07923	T	2447	1951	Demo'd	BAT 2006
'07924	T	2447	1951	Demo'd	BAT 2006
'07925	T	2447	1951	Demo'd	BAT 2006
'07926	T	2392	1951	Demo'd	BAT 2006
'07927	T	2392	1952	Demo'd	BAT 2006
'07928	T	2147	1952	Demo'd	BAT 2006
'07929	T	2147	1952	Demo'd	BAT 2006
'07930	T	2147	1952	Demo'd	BAT 2006
'07933	T	61576	2009		
'07934	T	61576	2009		
'07935	T	61576	2009		
'07936	T	61576	2009		
'07937	T	61576	2009		
'07940	T	14853	2009		
'07941	T	60180	2009		
'07942	T	46287	2009		
'07943	T	1456	2008		
'08000	T	2147	1952	Demo'd	BAT 2004
'08001	T	2147	1952	Priority	
'08002	T	2147	1952	Bunker	BAT 2004
'08003	T	2147	1952	Bunker	BAT 2004
'08004	T	2147	1952	Bunker	BAT 2005
'08005	T	2147	1952	Bunker	BAT 2005
'08006	T	2419	1952	Bunker	BAT 2005
'08007	T	2419	1952	Bunker	BAT 2004
'08008	T	2419	1952	Bunker	BAT 2005
'08009	T	2419	1952	Bunker	BAT 2004
'08010	T	2419	1952	Bunker	BAT 2004
'08011	T	2419	1952	Bunker	BAT 2004
'08012	T	2419	1952	Bunker	BAT 2005
'08013	T	2419	1952	Bunker	BAT 2005
'08014	T	2419	1952	Bunker	BAT 2005
'08015	T	2419	1952	Bunker	BAT 2005
'08016	T	2419	1952	Bunker	BAT 2005
'08017	T	2419	1952	Bunker	BAT 2005
'08018	T	2419	1952	Bunker	BAT 2005
'08019	T	2419	1952	Bunker	BAT 2005
'08020	T	2419	1952	Bunker	BAT 2005

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'08021	T	2419	1952	Bunker	BAT 2005
'08022	T	2419	1952	Bunker	BAT 2005
'08023	T	2419	1952	Bunker	BAT 2005
'08024	T	2419	1952	Bunker	BAT 2005
'08025	T	2419	1952	Bunker	BAT 2005
'08026	T	2419	1952	Bunker	BAT 2005
'08027	T	2419	1952	Bunker	BAT 2005
'08028	T	2419	1952	Bunker	BAT 2005
'08029	T	2419	1952	Bunker	BAT 2005
'08030	T	2419	1952	Bunker	BAT 2005
'08031	T	2419	1952	Bunker	BAT 2005
'08032	T	2419	1952	Bunker	BAT 2005
'08033	T	2419	1952	Bunker	BAT 2005
'08034	T	2419	1952	Bunker	BAT 2005
'08035	T	2519	1952	Bunker	BAT 2005
'08036	T	2519	1952	Bunker	BAT 2005
'08037	T	2519	1952	Bunker	BAT 2005
'08038	T	2519	1952	Bunker	BAT 2005
'08039	T	2519	1952	Bunker	BAT 2005
'08040	T	2419	1952	Bunker	BAT 2005
'08041	T	2419	1952	Bunker	BAT 2005
'08042	T	2419	1952	Bunker	BAT 2006
'08043	T	2419	1952	Bunker	BAT 2005
'08044	T	2419	1952	Bunker	BAT 2004
'08045	T	2419	1952	Bunker	BAT 2005
'08046	T	2419	1952	Bunker	BAT 2006
'08047	T	2419	1952	Bunker	BAT 2005
'08048	T	2419	1952	Bunker	BAT 2005
'08049	T	2419	1952	Bunker	BAT 2005
'08050	T	2419	1952	Bunker	BAT 2005
'08051	T	2419	1952	Bunker	BAT 2005
'08052	T	2419	1952	Bunker	BAT 2006
'08053	T	2419	1952	Bunker	BAT 2005
'08054	T	2419	1952	Bunker	BAT 2005
'08055	T	2419	1952	Bunker	BAT 2005
'08056	T	2419	1952	Bunker	BAT 2005
'08057	T	2419	1952	Bunker	BAT 2005
'08058	T	2419	1952	Bunker	BAT 2005
'08059	T	2419	1952	Bunker	BAT 2005
'08060	T	2419	1954	Bunker	BAT 2005
'08061	T	64	1961	Priority	
'08062	T	4432	1975		BAT 2004
'08063	T	4432	1975		BAT 2004
'08064	T	4432	1975		BAT 2004
'09001	T	3250	1999		BAT 2007
'09002	T	4732	1999		BAT 2007
'09003	T	4949	1999		BAT 2007
'09010	T	6598	2002		
'09011	T	474	2002		
'09012	T	5250	2005		
'09014	K	1600	2005		
'09017	K	336	2005	per PM - Survey on exception basis only	Unsurveyed
'09018	T	336	2005	per PM - Survey on exception basis only	Unsurveyed
'09022	T	336	2005	per PM - Survey on exception basis only	Unsurveyed
'09023	K	7000	2007		BAT 2009
'09025	K	2400	2008		
'71001	K	10663	2006		
'71002	T	2850	2005		BAT 2008
'71003	T	2850	2005		BAT 2008
'71004	T	4980	2006		BAT 2008
'71005	T	4980	2006		BAT 2008
'71006	T	8750	2006		BAT 2008
'71007	T	200	2007	per PM - Survey on exception basis only	Unsurveyed
'71010	K	Unknown	2008		BAT 2008
'71040	K	12200	2007		BAT 2008
0092A	T	700	1992		
0096A	T	2000	1994		
01R28	T	800	1988		BAT 2009
01RN9	T	966	1994		
02049	t	2922	2009		BAT 2009
02R28	T	552	1988		BAT 2009
02RN9	T	800	1994		

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03R28	T	552	1988		BAT 2009
04R28	T	800	1988		BAT 2009
04RS1	T	337.5	1997	Rec Shelter	
05R28	T	312	1988		BAT 2009
05RN9	T	200	1994		
06R28	T	760	1988		BAT 2009
07R28	T	Unknown	1988		BAT 2009
08R28	T	552	1988		BAT 2009
09R28	T	552	1988		BAT 2009
10R28	T	120	1988		BAT 2009
10R28	T	120	1988		BAT 2009
11R28	T	Unknown	1999		BAT 2009
14RS1	T	337.5	1997	Rec Shelter	
14RS2	T	337.5	1997	Rec Shelter	
14RS3	T	337.5	1997	Rec Shelter	
15RS1	T	337.5	1997	Rec Shelter	
15RS2	T	337.5	1997	Rec Shelter	
15RS3	T	337.5	1997	Rec Shelter	
1RN09	T	966	1994	Range building	BAT 2007
1RN10	T	119	1992	Range building	BAT 2009
1RN36	T	800	1992		
1RN46	K	220	1991		
2RN09	T	800	1994	Range building	BAT 2007
2RN36	T	800	1992	Range building	BAT 2007
3RN09	T	Unknown	1994	Range building	BAT 2007
3RN36	T	966	1992		BAT 2009
4RN09	T	Unknown	1994	Range building	BAT 2007
4RN36	T	Unknown	1992	Range building	BAT 2007
5505A	T	Unknown	Unknown		BAT 2009
5505B	T	Unknown	Unknown		BAT 2009
5505C	T	Unknown	Unknown		BAT 2009
5RN09	T	200	1994	Range building	BAT 2007
5RN36	T	240	1992		BAT 2009
6RN09	T	800	1994	Range building	BAT 2007
6RN36	T	200	1992		
7RN09	T	120	1994	Range building	BAT 2007
7RN36	T	Unknown	1992	Range building	BAT 2007
A0127	K	400	1988		BAT 2007
A0333	K	144	2003	per PM - Survey on exception basis only	Unsurveyed
A0401	T	3011	2003	per PM - Survey on exception basis only	Unsurveyed
A0902	T	4872	2008	per PM - Survey on exception basis only	Unsurveyed
A1000	T	2479	2004	per PM - Survey on exception basis only	Unsurveyed
A1502	T	2346	2003	per PM - Survey on exception basis only	Unsurveyed
A1568	T	Unknown	Unknown	Not on list, located next 1568 & marked	BAT 2007
A1584	T	199	1975	Priority	
A1585	t	199	1975	Priority	
A2194	T	2860	2005	per PM - Survey on exception basis only	Unsurveyed
A2195	T	2860	2005	per PM - Survey on exception basis only	Unsurveyed
A2261	T	200	1993	per PM - Survey on exception basis only	Unsurveyed
A2303	T	624	1970	per PM - Survey on exception basis only	Unsurveyed
A2931	T	2016	2008		
A2932	T	2016	2008		
A2933	T	2016	2008		
A2934	T	Unknown	2008		
A2935	T	2016	2008		
A3000	K	1500	1995		
A3211	K	800	2008		
A3610	K	820	2005	per PM - Survey on exception basis only	Unsurveyed
A3781	K	2850	2005	per PM - Survey on exception basis only	Unsurveyed
A3900	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
A3904	K	4000	2004	per PM - Survey on exception basis only	Unsurveyed
A3932	K			per PM - Survey on exception basis only	Unsurveyed
A3961	K	2850	2005	per PM - Survey on exception basis only	Unsurveyed
A4000	K	4000	2004	per PM - Survey on exception basis only	Unsurveyed
A4003	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
A4057	K			Modular	
A4190	K	1500	1993		
A4900	K	1857	2004		BAT 2007
A5000	K	2479	2004		BAT 2007
A5004	K	1687	1992	per PM - Survey on exception basis only	Unsurveyed

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A5005	K	40	1994	per PM - Survey on exception basis only	Unsurveyed
A5099	T	Unknown	Unknown		BAT 2009
A5100	T			per PM - Survey on exception basis only	Unsurveyed
A5161	T			per PM - Survey on exception basis only	Unsurveyed
A5210	T	200	2007	per PM - Survey on exception basis only	Unsurveyed
A5212	T	2161	1989		BAT 2007
A5225	T	2000	2001		BAT 2009
A5293	T	3000	2004		
A5513	T	1440	2008		
A5663	T	234	1983		BAT 2009
A5737	T	1056	2006	per PM - Survey on exception basis only	Unsurveyed
A5800	K	240	2006	per PM - Survey on exception basis only	Unsurveyed
A5982	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
A6001	T	692	1989		
A6087	T	Unknown	Unknown	Not on list, on map	BAT 2007
A6090	K	1559	1996		
A6092	K	693	1989		BAT 2009
A6476	K	200	2007	per PM - Survey on exception basis only	Unsurveyed
A6477	K	200	2007	per PM - Survey on exception basis only	Unsurveyed
A6490	K	1200	1965		BAT 2006
A6521	K	240	2006	per PM - Survey on exception basis only	Unsurveyed
A6525	K	240	2006	per PM - Survey on exception basis only	Unsurveyed
A6613	T	500	2008		
A6618	T	4752	1991		BAT 2009
A6619	T	120	1983		BAT 2005
A6621	T	3437	1980		BAT 2009
A6623	T	Unknown	Unknown		BAT 2009
A6628	T	157	1976	per PM - Survey on exception basis only	Unsurveyed
A6631	T	320	2000		BAT 2009
A6636	T	249	1987		BAT 2009
A6638	T	75000	2002		BAT 2009
A6645	T	276	1983		BAT 2008
A6647	T	1920	1984		
A6800	T	4000	2004	per PM - Survey on exception basis only	Unsurveyed
A6820	T	3000	2004	per PM - Survey on exception basis only	Unsurveyed
A6828	T			per PM - Survey on exception basis only	Unsurveyed
A6885		Unknown	Unknown		BAT 2009
A6921	K	1470	1976		BAT 2009
A6924	K	3688	1978		BAT 2005
A6934	K	200	2007	per PM - Survey on exception basis only	Unsurveyed
A6989		Unknown	Unknown		BAT 2009
A6990	T	820	2005	per PM - Survey on exception basis only	Unsurveyed
A7000	K	4000	2004	per PM - Survey on exception basis only	Unsurveyed
A7001	K	2850	2005	per PM - Survey on exception basis only	Unsurveyed
A7029	K	1809	2004	per PM - Survey on exception basis only	Unsurveyed
A7060	K	1999	1989		BAT 2007
A7062	K	1600	1989		BAT 2007
A7074	K	200	2007		
A7089	K	1056	2006	per PM - Survey on exception basis only	Unsurveyed
A7100	K	3872	2006	per PM - Survey on exception basis only	Unsurveyed
A7108	K	Unknown	1993		BAT 2008
A7134	K	8280	1994		BAT 2008
A7135	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
A7140	K	414	1959		BAT 2009
A7151	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
A7154	K	1200	1980		
A7156	K	1200	1977		BAT 2008
A7163	K	156	1975		BAT 2008
A7170	K	4000	1984		BAT 2008
A7177	K	4859	1992		BAT 2007
A7180	K	89	2002	per PM - Survey on exception basis only	Unsurveyed
A7194	K	10500	2004		BAT 2008
A7197	K	1857	2004		BAT 2008
A7199	K	64	2004	per PM - Survey on exception basis only	Unsurveyed
A7201	K	186	1975	per PM - Survey on exception basis only	Unsurveyed
A7208	K	1000	1984	per PM - Survey on exception basis only	Unsurveyed
A7225	K	Unknown	Unknown		BAT 2008
A7230	K	174	1974		BAT 2008
A7277	K	187	1994		
A7278	K	1013	1995		
A7290	K	8400	1997		
A7297	K	157	1959	per PM - Survey on exception basis only	Unsurveyed

Appendix D - OMA Lead-Based Paint Survey Tracking List

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A7347		4800	2007		
A7476	T	2479	2004	per PM - Survey on exception basis only	Unsurveyed
A7477	T	Unknown	2009		BAT 2009
A7501	T	1809	2004		BAT 2007
A7635	K	400	1982		
A7833	T	467	2004	per PM - Survey on exception basis only	Unsurveyed
A7834	T	3360	2004	per PM - Survey on exception basis only	Unsurveyed
A9011		474	2009		
B0127	K	783	1991		BAT 2007
B0401	T	2282	2003	per PM - Survey on exception basis only	Unsurveyed
B1502	T	1616	2003	per PM - Survey on exception basis only	Unsurveyed
B2194	T	2390	2005	per PM - Survey on exception basis only	Unsurveyed
B2195	T	1860	2005	per PM - Survey on exception basis only	Unsurveyed
B2932	T	2016	2008		
B2934	T	2016	2008		
B3610	K	820	2005	per PM - Survey on exception basis only	Unsurveyed
B3781	K	2850	2005	per PM - Survey on exception basis only	Unsurveyed
B3900	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
B3904	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
B4000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
B4003	K	2800	2004		
B5099	T	Unknown	Unknown		BAT 2009
B5212	T	2100	2003		BAT 2007
B5293	T	3000	2004		
B5513	T	1440	2008		
B5737	T	240	2006	per PM - Survey on exception basis only	Unsurveyed
B5982	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
B6080	T	1160	1986		
B6087	T	405	1977		BAT 2008
B6090	K	196	1996		
B6099	K	3200	1987		
B6102	K	24	2008		BAT 2009
B6628	T	5200	1987		
B6631	T	180	2000		BAT 2009
B6636	T	249	1987		BAT 2009
B6647	T	1920	1984		BAT 2007
B6800	T	2800	2004	per PM - Survey on exception basis only	Unsurveyed
B6820	T	2800	2004	per PM - Survey on exception basis only	Unsurveyed
B6885	T	Unknown	1996	Ramp #1	BAT 2003
B6989		Unknown	Unknown		BAT 2009
B6990	T	820	2005	per PM - Survey on exception basis only	Unsurveyed
B7000	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
B7060	K	1200	1989		BAT 2007
B7134	K	200	2007	per PM - Survey on exception basis only	Unsurveyed
B7135	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
B7140	K	35	2004		
B7146	K	8496	2002		
B7151	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
B7194	K	10500	2006		BAT 2008
B7198	K	100	2007	per PM - Survey on exception basis only	Unsurveyed
B7347	T	1870	2007		
B7833	T	584	2004	per PM - Survey on exception basis only	Unsurveyed
B7834	T	3360	2004	per PM - Survey on exception basis only	Unsurveyed
C2194	T	1860	2005	per PM - Survey on exception basis only	Unsurveyed
C2195	T	2390	2005	per PM - Survey on exception basis only	Unsurveyed
C2577	T			per PM - Survey on exception basis only	Unsurveyed
C2932	K	2016	2008	Indiana Ave.	
C3900	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
C3904	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
C3932	K	820	2005	per PM - Survey on exception basis only	Unsurveyed
C4000	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
C4003	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
C5212	T	2100	2003		BAT 2007
C5513	T	1440	2008		
C5982	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
C6080	T	1160	1986		
C6087	T	2400	1985		BAT 2008
C6090	K	2400	1996		
C6647	T	1400	1984		BAT 2007
C6800	T	3000	2004	per PM - Survey on exception basis only	Unsurveyed
C6820	T	3000	2004	per PM - Survey on exception basis only	Unsurveyed
C6885	T	Unknown	1996	Ramp #2	BAT 2003

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C7000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
C7060	K	1200	1989		BAT 2007
C7135	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
C7141	K	192	1967		BAT 2008
C7151	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
C7198	K	100	2007	per PM - Survey on exception basis only	Unsurveyed
C7262	K	5100	2005		
D2194	T	2390	2005	per PM - Survey on exception basis only	Unsurveyed
D2195	T	1900	2005	per PM - Survey on exception basis only	Unsurveyed
D3900	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
D3904	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
D4000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
D4003	K	4066	2004	per PM - Survey on exception basis only	Unsurveyed
D4057	K			Modular	
D5212	T	2100	2003		BAT 2007
D5982	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
D6080	T	5000	1989		
D6636	T	2400	1989		BAT 2009
D6647	T	1520	1984		BAT 2007
D6800	T	2700	2004	per PM - Survey on exception basis only	Unsurveyed
D6820	T	2800	2004	per PM - Survey on exception basis only	Unsurveyed
D6828	T	240	2006	per PM - Survey on exception basis only	Unsurveyed
D6885	T	Unknown	1996	Ramp #3	BAT 2003
D7000	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
D7062	K	1056	2006	per PM - Survey on exception basis only	Unsurveyed
D7135	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
D7151	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
D7277	K	1200	2006		
E2194	T	1860	2005	per PM - Survey on exception basis only	Unsurveyed
E2195	T	2390	2005	per PM - Survey on exception basis only	Unsurveyed
E3900	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
E3904	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
E4000	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
E4003	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
E5212	T	2100	2003		BAT 2007
E5982	K	1890	2005	per PM - Survey on exception basis only	Unsurveyed
E6621	T	1706	1981		BAT 2006
E6647	T	2760	1984		BAT 2007
E6800	T	3000	2004	per PM - Survey on exception basis only	Unsurveyed
E6820	T	3000	2004	per PM - Survey on exception basis only	Unsurveyed
E6885	T	Unknown	1996	Ramp #4	BAT 2003
E7000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
E7062	K	240	2006	per PM - Survey on exception basis only	Unsurveyed
E7135	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
E7140	K	2040	1997	per PM - Survey on exception basis only	Unsurveyed
E7151	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
F2194	T	2390	2005	per PM - Survey on exception basis only	Unsurveyed
F2195	T	1860	2005	per PM - Survey on exception basis only	Unsurveyed
F3900	K	4066	2004	per PM - Survey on exception basis only	Unsurveyed
F3904	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
F4000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
F4003	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
F5212	T	2100	2003		BAT 2007
F5982	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
F6621	T	3200	1985		BAT 2008
F6647	T	828	1984		BAT 2007
F6800	T	2800	2004	per PM - Survey on exception basis only	Unsurveyed
F6820	T	3000	2004	per PM - Survey on exception basis only	Unsurveyed
F7000	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
F7135	K	3914	2005	per PM - Survey on exception basis only	Unsurveyed
F7140	K			per PM - Survey on exception basis only	Unsurveyed
F7141	K	120	1967		BAT 2008
F7151	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
F7832	T	Unknown	Unknown	per PM - Survey on exception basis only	Unsurveyed
G0001	T	33	2001		
G0006	K	33	2002		BAT 2006
G0010	K	33	Unknown		BAT 2009
G0011	T	33	2001		BAT 2007
G0012	T	33	2001		BAT 2007
G0013	T	26	2009		
G0014	T	26	2009		
G2194	T	1860	2005	per PM - Survey on exception basis only	Unsurveyed

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G2195	T	2390	2005	per PM - Survey on exception basis only	Unsurveyed
G3900	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
G3904	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
G4000	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
G4003	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
G6647	T	828	1984		BAT 2007
G6800	T	3000	2004	per PM - Survey on exception basis only	Unsurveyed
G6820	T	2800	2004	per PM - Survey on exception basis only	Unsurveyed
G7000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
G7135	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
G7151	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
H2194	T	1900	2005	per PM - Survey on exception basis only	Unsurveyed
H2195	T	1860	2005	per PM - Survey on exception basis only	Unsurveyed
H3900	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
H3904	K	3154	2004	per PM - Survey on exception basis only	Unsurveyed
H4000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
H4003	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
H6647	T	978	1984		BAT 2007
H6800	T	2800	2004	per PM - Survey on exception basis only	Unsurveyed
H6820	T	3000	2004	per PM - Survey on exception basis only	Unsurveyed
H7000	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
H7135	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
H7151	K	3460	2005	per PM - Survey on exception basis only	Unsurveyed
I3904	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
I4000	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
I6800	T	3000	2004	per PM - Survey on exception basis only	Unsurveyed
I6820	T	2800	2004	per PM - Survey on exception basis only	Unsurveyed
I7000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
I7135	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
I7151	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
J3904	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
J4000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
J6647	T	978	1984		BAT 2007
J6800	T	2800	2004	per PM - Survey on exception basis only	Unsurveyed
J6820	T	3154	2004	per PM - Survey on exception basis only	Unsurveyed
J7000	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
J7135	K	1860	2005	per PM - Survey on exception basis only	Unsurveyed
J7151	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
K3904	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
K6647	T	978	1984		BAT 2007
K7000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
K7135	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
L3904	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
L6647	T	978	1984		BAT 2007
L7000	K	2800	2004	per PM - Survey on exception basis only	Unsurveyed
L7135	T	1860	2005	per PM - Survey on exception basis only	Unsurveyed
M6647	T	978	1984		BAT 2007
M7000	K	3000	2004	per PM - Survey on exception basis only	Unsurveyed
N6090	K	5000	1996		
N6647	T	978	1984		BAT 2007
N7000	K	3608	2004	per PM - Survey on exception basis only	Unsurveyed
NRAD2	K	234	1994	Range building	
O6647	T	978	1984		BAT 2007
O7135	K	2390	2005	per PM - Survey on exception basis only	Unsurveyed
P6647	T	1944	1993		BAT 2007
Q6647	T	1944	1993		BAT 2007
R0016	K	750	1968	Range building	BAT 2009
R0017	K	750	1968	Range building	BAT 2008
R0027	K	750	1985	Range building	BAT 2009
R002B	K	392	2009	Range building	
R002C	K	576	2009	Range building	
R002D	K	940	2009	Range building	
R0038	K	Unknown	Unknown		BAT 2008
R003B	K	760	2009	Range building	
R003D	K	128	2009	Range building	
R003E	K	760	2009	Range building	
R0042	K	1500	1950	Priority	
R0051	T	750	1992	Range building	
R0052	K	750	1992	Range building	
R0054	K	750	1991	Range building	
R0055	K	750	1992	Range building	
R007A	T	576	2005	Range building	BAT 2007

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R010A	T	576	2005	Range building	BAT 2007
R011A	T	576	2005	Range building	BAT 2007
R012A	T	576	2005	Range building	BAT 2007
R012B	K	5500	2009	Range building	
R013B	K	119		Range building	
R013C	K	576		Range building	
R015A	K	760		Range building	
R016A	K	1000		Range building	
R017A	k			Range building	
R022A	K	576	2005	Range building	BAT 2007
R023B	K	576	2005	Range building	BAT 2007
R024B	K	576	2009	Range building	
R026A	K	576	2005	Range building	BAT 2008
R026B	K	576	2005	Range building	BAT 2008
R029A	K	576	2005	Range building	
R031A	K	576	2005	Range building	
R035A	K	1725	2009	Range building	
R035B	K	1725	2009	Range building	
R036A	T	576	2005	Range building	BAT 2007
R046A	K	576	2005	Range building	BAT 2007
R6647	T	1944	1993		BAT 2007
RSGH1		169	2003		
RSGH2		169	2003	Rec Shelter	
RSGH3		169	2003	Rec Shelter	
RSLV1		900	2003	Rec Shelter	
S7843	T	Unknown	Unknown	per PM - Survey on exception basis only	Unsurveyed
T7218	K	Unknown	Unknown	per PM - Survey on exception basis only	Unsurveyed
T9126	T	Unknown	Unknown	per PM - Survey on exception basis only	Unsurveyed
TA14A		576	2003	Range Central	
Unk 1	T	Unknown	Unknown	Craig Village	BAT 2003
Unk 2	T	Unknown	Unknown	Craig Village	BAT 2003
Unk 3	T	Unknown	Unknown	Craig Village	BAT 2003
Unk 4	T	Unknown	Unknown	Craig Village	BAT 2003
Unk 5	T	Unknown	Unknown	Craig Village	BAT 2003
Unk 6	T	Unknown	Unknown	Craig Village	BAT 2003
Unk 7	T	Unknown	Unknown	Craig Village	BAT 2003
Unk 8	T	Unknown	Unknown	Craig Village	BAT 2003
Unk 9	T	Unknown	Unknown	Craig Village	BAT 2003
Z6694	T	100	1955		BAT 2004

SUMMARY OF BUILDINGS LISTED

1072	Surveys Conducted by BAT (does not
136	Demolished - surveyed by BAT
22	Surveys Conducted by Other Contractors
1	Demolished - surveyed by Other Contractors
1231	Total Surveys Conducted
23	Unsurveyed - to be surveyed by school system
2	Unsurveyed - Asbestos/Radon
36	Unsurveyed - Demolished
234	Unsurveyed - Per Program Manager, survey on exception basis only
306	Buildings to be surveyed
601	Total unsurveyed
1832	Total Buildings on List

SUMMARY OF BUILDINGS TO BE SURVEYED

11	BUILDINGS ERECTED BEFORE 1978
1	CHILD OCCUPIED FACILITIES
294	LOWER PRIORITY FOR SURVEY
306	TOTAL TO BE SURVEYED

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.

◀ OSHA Standard Interpretation and Compliance Letters - Table of Contents

- **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

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/cm². 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 15mg/m³ and the concentration of lead in paint is 0.06%, the airborne lead level will be (0.06%)x (15mg/m³) x(1000µg/mg)=9µg/m³. Consequently, the airborne concentration of dust would have to be 50mg/m³ before the action level of 30µg/m³ would be reached. Arithmetically, this would read, (50mg/m³ airborne paint)x (0.06% lead)x (1000µg/mg)=30µg/m³ 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

◀ OSHA Standard Interpretation and Compliance Letters - Table of Contents

APPENDIX F

PROTOCOL
FOR LEAD CONTAINING PAINT (LCP)
SURFACE PREPARATION
(Rev. 26 May 10)

This limited protocol is **for Lead Containing Paint (LCP) with a lead content of 4999 ppm or less**. (This protocol is **based upon an exposure assessment** for surface preparation at Bldg. 2994, on 20 May 2010.)

Under no circumstances shall this protocol, based upon the exposure assessment performed, be extended to encompass surface work on Lead-Based Paint. **The exposure assessment and this protocol are only valid through 20 May 2011.** Follow on exposure assessments and protocols (similar to this one) will be forthcoming. The DPW Environmental Division should be consulted for any undated exposure assessment / protocol information.

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.

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
Paint Scrapping / Removal Tool
Polyethylene Sheeting
Duct Tape
Large Opaque Polyethylene Trash Bags
Surfactant (mixture of water & soap[1], approximately 2:1)

[1] Non-foaming soap (such as an automatic dishwasher soap.)

DIRECTIONS

- 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 the area to be scrapped.
- Utilizing the paint scrapping / removal tool, scrape and remove and flaking paint. It is not necessary to remove all paint or 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[2]" 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 completely, 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 them is paramount for proper health and safety considerations.

[2] Twist the top of the bag and fold it over and tape securely.

PROTOCOL
FOR LEAD CONTAINING PAINT
SURFACE PREPARATION

Even if a painted surface is not a Lead-Based Paint (lead content of 5000 ppm or greater), OSHA requires that we protect workers from any lead content. This protocol is **for Lead Containing Paint (lead content of 4999 ppm or less)**. Under no circumstances shall this protocol be extended to encompass surface work on Lead-Based Paint. *Strict adherence to these work practices is paramount for proper health and safety.*

DIRECTIONS

1. Prep the area

a. Cover the ground / floor completely in the immediate vicinity of the work area with polyethylene drop cloth.
b. Mist the area to be scraped with a spray bottle containing a 4:1 mixture of water and soap[1].

2. Scrape

a. Begin removal from the highest point working down, utilizing paint scrapping / removal tool.
b. Scrape and remove only the paint that comes off easily. It is not necessary to remove all paint down to the original surface.

3. Clean up area

a. Fold all paint residue, surfactant and other debris into the polyethylene drop cloth.
b. Place drop cloth in opaque polyethylene bags and seal with duct tape.
c. Place that bag inside of another, securing the second bag in a "Goose Neck[2]" manner.
d. Deposit in a dumpster.

4. Clean yourself

a. Bathe completely.
b. Wash all clothes worn for the project.

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BOTTOM LINE: AVOID – PROTECT – CLEAN UP

AVOID creating or spreading paint chips and dust.
PROTECT yourself by practicing good personal hygiene.
CLEAN UP the work area prior to starting the job and upon completion of the job.

[1] Non-foaming soap (such as automatic dishwasher soap.)
[2] Twist the top of the bag and fold it over and tape securely.