

In-Place Management Controls of Lead-Based Paint





♦ Military Housing Occupants/

Installation Lead Teams

♦ Risk Assessment

Temporary Controls

Importance of a Comprehensive Risk Assessment

A risk assessment determines how much of a health hazard lead-based paint (LBP) may pose based on the condition of the paint, age of occupants, cleanliness of house, etc. In most cases, the property owner (such as the installation housing office) must ensure a risk assessment is completed. This should include sampling for LBP and lead-bearing dust prior to using any in-place management controls (also known as interim controls).

A properly performed risk assessment will aid in determining:

- ◆ If LBP problems exist.
- ◆ What in-place management controls would be most appropriate.
- ◆ If abatement should occur instead of in-place management controls.

In-Place Management vs. Abatement

In-place management controls of LBP intend to make housing units and facilities lead-safe by temporarily controlling lead hazards; abatement controls lead hazards permanently. The Centers for Disease Control defines "permanently" as 20 years.

Consider in-place management controls when:

◆ Inspections and/or risk assessments have identified LBP hazards.

- ◆ In-place management controls would be more appropriate to control the hazards as opposed to immediate abatement.
- ◆ Meeting the requirements of the Department of Army's (DA) LBP policies concerning in-place management controls in target facilities is necessary.
- ◆ An alternative to abatement is necessary until you receive proper funding to abate LBP hazards.

Forms of In-Place Management Controls

- ◆ Cleaning surfaces with a high phosphate detergent (such as automatic dishwasher detergent) or detergents made specifically for this purpose to reduce levels of leadbearing dust to acceptable levels.
- ◆ Stabilizing all LBP surfaces by removing defective paint and repainting.
- ◆ Repairing all defective and rotted substrates that could result in rapid paint deterioration.
- ◆ Treating friction and impact surfaces, such as doors, floors, steps, handrails and windows, when there is concern that these objects are responsible for generating LBP chips or lead-bearing dust.
- ◆ Treating protruding, accessible surfaces where LBP may be present, such as windowsills, that children might chew on.

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- ◆ Repairing leaking roofs and siding to prevent paint deterioration.
- ◆ Educating residents and maintenance personnel on how to avoid lead poisoning.
- ◆ Using good personal hygiene practices, such as handwashing, after performing cleaning operations.

For More Information

- * Memorandum, Office of the Assistant Secretary, 28 April 1993, subject: Lead-Based Paint Policy Guidance.
- * Memorandum, Assistant Chief of Staff for Installation Management, DAIM-FDF-B, 5 November 1993, subject: Policy Guidance Lead-Based Paint and Asbestos in Army Properties Affected by Base Realignment and Closure.
- * U.S. Department of Housing and Urban Development, Office of Public and Indian Housing, September 1990 (pages 87, 89, and A14-111 revised May 1991). Lead-Based Paint: Interim Guidelines for Hazard Identification and Abatement in Public and Indian Housing.