

RAB SHEET

QUESTIONS REGARDING LEAD-BASED PAINT IN HOUSING

In a recent Restoration Advisory Board meeting, questions were asked regarding lead-based paint that may be present in older housing. In response to the questions asked, the Navy has put together this fact sheet.

History of Lead in Residential Paint

Lead has been used in residential applications for centuries. It is an excellent pigment for residential paint and was often used to help quicken the drying process. Before 1950, lead-based paint was used extensively throughout residential dwellings (interior and exterior). It was not until late 1950's that paint manufacturers voluntarily reduced the lead content of paint for residential applications. Between 1950-1960, it was used primarily for exterior applications and high traffic/impact areas (e.g., trim, doors, windows, kitchens, bathrooms, etc.). Between 1960-1978, its use was limited to exterior applications. In 1978, the Consumer Product Safety Commission mandated the reduction of lead in residential use to 600 parts per million (ppm). Lead-based paint is still used in industrial applications such as: on bridges; on the inside and outside of steel structures to prevent rust and corrosion; and in shipbuilding and repair.



When properly managed and maintained, lead-based paint poses little risk. If improperly managed, the deteriorating paint poses adverse health effects to those exposed, especially children under 6 years of age. It is important to maintain the paint in good condition and to repair and stabilize damaged paint. The most common places where lead-based paint can still be found is; inside homes on woodwork, walls, floors, windows, doors, and stairs. It was also used on the outside of homes on; porches, windows, and doors because it stood up to weather changes

Health Effects of Lead

It is important to note that anyone can get lead poisoning. However, those at greatest risk are children under six years old and pregnant women. Lead is detrimental to fetuses' and children's developing brains and nervous systems. Early childhood exposure to large amounts of lead can cause brain damage, mental retardation, hearing loss, stunted growth, decreased attention span, behavior problems, anemia, liver and kidney damage, hyperactivity, developmental delays, and other physical and mental problems. Severe lead exposure in children (blood lead levels greater than or equal to 80 micrograms per deciliter) can cause convulsions and even death. The Centers for Disease Control and Prevention estimates that 890,000 U.S. children, ages one to five, have elevated blood levels.

Navy Requirements Prior to Transfer

Lead-based paint activities in residential areas are governed by the Residential Lead-Based Paint Hazard Reduction Act, commonly known as Title X of the Housing and Community Development Act of 1992. Title X requires federal agencies to address lead-based paint in residential real property. Title X statute states as one of the purposes of the legislation that Congress intended was “to reduce the threat of childhood lead poisoning in housing owned, assisted, or transferred by the Federal Government.” As amended, it also “requires the inspection and abatement of lead-based paint hazards in all federally owned target housing constructed prior to 1960,” as well as inspection for lead-based paint and lead-based paint hazards in all federally owned target housing constructed between 1960-1977. Under the governing regulations, the Navy is required to perform inspections, risk assessments, interim controls, and abatement of lead-based paint hazards in federally owned target housing and target housing receiving federal assistance. The Navy also must disclose any known lead-based paint and lead-based paint hazards before transfer of the target housing.

Lead-based paint inspections and risk assessments must be performed for all target housing prior to the land transfer. Risk assessments must be performed within 12 months of the date of transfer, and any abatement required must be conducted no later than 12 months after the completion of the risk assessment. The responsibility for abatement may be assumed by the transferee through the transfer agreement. Interim hazard standards for painted components, dusts, and soils are estab-

Preventive Measures

- ? Keep children away from peeling or chipping paint and accessible or chewable surfaces painted that have lead-based paint, especially windows, windowsills, and window wells.
- ? Do not use a belt sander, propane torch, dry scraper, or dry sandpaper on painted surfaces that may contain lead.
- ? Do not try to remove lead-based paint yourself.
- ? Take precautions to avoid exposure to lead dust when remodeling or renovating. (Call the National Lead Information Clearinghouse at 1-800-424-LEAD (1-800-424 5323) or 1-800-LEAD-FYI (1-800-532-3394) for guidelines.)
- ? Clean regularly by washing smooth surfaces (walls, floors, cabinets, window ledges, toys pacifiers) with a high phosphate soap (powdered dishwasher detergent).
- ? Do not vacuum with a regular household vacuum cleaner (do not retrofit a regular vacuum cleaner with a high efficiency particulate air (HEPA) filter). Use a vacuum cleaner designed with a HEPA filter. Household vacuum cleaners causes lead dust to migrate and aggravate the problem.
- ? Wipe soil off shoes before entering the house.
- ? Frequently, wash children’s hands and faces (especially before they eat).
- ? Make sure children eat nutritious, low-fat meals high in iron and calcium, such as spinach and dairy products. Children with good diets absorb less lead.

lished for use until proposed regulations implementing Toxic Substances Control Act (TSCA) Section 403 become effective. Pertinent sections of TSCA are provisions for the development of regulations for identifying lead-based paint hazards on residential property including standards for dust and soil. TSCA also covers training and certification for persons involved in lead-based paint activities.

Under the Department of Defense (DoD) Policy, the Navy must abide by the following requirements:

- ? Abate soil-lead hazards surrounding target housing constructed between 1960 and 1978.
- ? Evaluate the need for abatement, interim controls or no action where potential soil-lead hazards (bare soils with lead concentrations between 400-2000 ppm, with the lower value applicable to children's play areas). The level of action will be determined by the lead-based paint risk assessment.
- ? Child-occupied facilities constructed between 1960-1978 (day care centers, preschools, and kindergarten classrooms visited regularly by children under 6 years of age), located on residential real property that will be reused as child-occupied facilities following transfer, will be evaluated for lead-based paint hazards. The transferee must abate any hazards identified prior to use as a child-occupied facility.
- ? The transferee will evaluate any redeveloped residential real property for soil-lead hazards after demolition of target housing units. Abatement of any soil-lead hazards will be conducted by the transferee prior to occupancy of any newly constructed dwellings.

These requirements expand the application of Title X requirements to include child-occupied facilities providing an added measure of protection for children. The DoD policy also extends Title X abatement requirements to soil-lead hazards surrounding housing constructed between 1960 and 1978, ensuring that all soil-lead hazards are abated regardless of the age of the housing.

Adak Lead-Based Paint Survey

In the autumn 2001, a Navy contractor will perform a lead-based paint evaluation on Adak. This evaluation will include a lead-based paint inspection, as well as a lead-based paint risk assessment. The target units will be those built between 1960 - 1978. Pertinent HUD, EPA and/or DoD guidance documents will be used in conducting the evaluation. Based on the completed risk assessment report, options for control and/or abatement of lead-based paint hazards will be proposed.

Where to get more information

CONSUMER PRODUCT SAFETY ACT (CPSA). 16 CFR 1303, "Ban Of Lead Containing Paint and Certain Consumer Products Bearing Lead-Containing Paint".

HUD Regulation 24 CFR 35. Elimination of Lead-Based Paint Hazards in Federally Owned Properties Prior to Sale for Residential Habitation.

HUD Regulation 24 CFR 35-37 (Found in Federal Register 61 FR 29170, 7 June 1996). Requirements for Disclosure of Know Lead-Based Paint and Lead Based Paint Hazards in Housing; Final Rule.

EPA Regulation 40 CFR 745. Requirements for Disclosure of Known Lead-Based Paint and Lead-Based Paint Hazards in Housing; Final Rule.

Residential Lead-Based Paint Hazard Reduction Act Of 1992 (Public Law 102-550) . Title X of the Housing and Community Development Act.

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