

## SECTION 11

### TOXIC SUBSTANCES MANAGEMENT

#### Active Army Supplement, June 2001

##### A. U.S. Army Regulations (ARs) and Policies

###### *PCBs*

- AR 200-1, *Environmental Protection and Enhancement*. This AR, dated 21 February 1997, provides an overview of environmental programs and requirements. It supplements Federal, state, and local laws for preserving, protecting, and restoring quality of the environment. It applies to Active Army, Army National Guard, Army Reserve, and civil works activities that are under the jurisdiction of the U.S. Army Corps of Engineers. It also applies to tenants, such as other Federal agencies, contractor activities, and lessees performing activities in direct support of the Army located on real property under DA jurisdiction.

###### *Asbestos*

- AR 200-1, *Environmental Protection and Enhancement*. This AR, dated 21 February 1997, provides an overview of environmental programs and requirements. It supplements Federal, State, and local laws for preserving, protecting, and restoring quality of the environment. It applies to Active Army, Army National Guard, Army Reserve, and civil works activities that are under the jurisdiction of the U.S. Army Corps of Engineers. It also applies to tenants, such as other Federal agencies, contractor activities, and lessees performing activities in direct support of the Army located on real property under DA jurisdiction.
- AR 405-90, *Disposal of Real Estate*. This AR, dated 10 May 1985, details the requirements and process for the disposal of property.
- AR 420-70, *Buildings and Structures*. This AR, dated 10 October 1997, prescribes the policies and standards for facility engineering responsibilities for buildings and structures. This regulation does not apply to the Army National Guard. It also does not apply to facilities occupied by Army activities as tenants when support is provided by another government agency [**Revised April 2000**].
- US Army Center for Public Works Technical Bulletin TB 420-70-8, *Installation Asbestos Management Program* (23 Mar 98), <http://160.147.90.223/pubs/engr/420708.pdf> [**Added April 2000**].

###### *Radon*

- AR 200-1, *Environmental Protection and Enhancement*. This AR, dated 21 February 1997, provides an overview of environmental programs and requirements. It supplements Federal, state, and local laws for preserving, protecting, and restoring quality of the environment. It applies to Active Army, Army National Guard, Army Reserve, and civil works activities that are under the jurisdiction of the U.S. Army Corps of Engineers. It also applies to tenants, such as other Federal agencies, contractor activities, and lessees performing activities in direct support of the Army located on real property under DA jurisdiction.

###### *Lead-Based Paint*

- AR 200-1, *Environmental Protection and Enhancement*. This AR, dated 21 February 1997, provides an overview of environmental programs and requirements. It supplements Federal, state, and local laws for preserving, protecting, and restoring quality of the environment. It applies to Active Army, Army National Guard, Army Reserve, and civil works activities that are under the jurisdiction of the U.S. Army Corps of Engineers. It also applies to tenants, such as other Federal agencies, contractor activities, and lessees performing activities in direct support of the Army located on real property under DA jurisdiction.
- AR 420-70, *Buildings and Structures*. This AR, dated 10 October 1997, prescribes the policies and standards for facility engineering responsibilities for buildings and structures. This regulation does not apply to the Army National Guard. It also does not apply to facilities occupied by Army activities as tenants when support is provided by another government agency **[Revised April 2000]**.
- US Army Center for Public Works Technical Bulletin TB 420-70-2, *Installation Lead Hazard Management - A Handbook* (20 Feb 97) <ftp://160.147.90.223/ftp/pubs/420-70-2.pdf> **[Added April 2000]**.

## **B. Department of Defense (DOD) Directives and Instructions**

- Under Secretary of Defense Letter, *Asbestos, Lead Paint, and Radon Policies at BRAC Properties*. This letter, dated 31 October 1994, outlines DOD policies on asbestos, lead paint, and radon at BRAC properties.

## **C. Using the TEAM Guide for ECAS**

- When performing compliance assessments, assessors are to notify the program management assessors of program management issues they identify.

## **D. Key Army/DOD Compliance Requirements**

- Training - Army military and civil works personnel who handle or may potentially be exposed to PCBs are required to be trained to perform PCB-related responsibilities in a safe and environmentally sound manner (AR 200-1, para 4-4a and 4-4b).
- Capacitors - Small PCB capacitors (containing less than 3 lb of dielectric fluid) are required to be disposed of or demilitarized by methods which preserve the integrity of the container instead of crushing or other processes which may result in the release of PCBs (AR 200-1, para 4-4d).
- Asbestos Survey - Installations are required to have conducted a survey of all their structures (AR 200-1, para 8-3b).
- Asbestos Management Plan - The installation must prepare an Asbestos Management Plan that includes the following (AR 200-1, par 8-2h and 8-3):
  1. a complete list of operations and maintenance schedules, design plans, and specifications that identify structures scheduled for repair, alteration, or demolition
  2. an installation-wide survey of all structures to determine the location, extent, and condition of all asbestos
  3. an exposure and risk assessment for each occurrence of asbestos as to the potential for environmental release and risks to human health and the environment
  4. preparation and implementation of abatement plans to minimize potential for asbestos exposure for each area where it exists
  5. preparation, coordination and immediate implementation of a special Operations and Maintenance (O&M) plan for each occurrence of asbestos
  6. provision for worker education/training programs

7. an environmental impact analysis of the Installation Asbestos Management Plan (as required by AR 200-2).
- Asbestos Management Team - Installations are required to establish an Asbestos Management Team (AR 200-1, para 8-2d). Installations are required to take immediate action where a possible asbestos-related health hazard has been identified (AR 200-1, para 8-2i, 8-2j, and 8-2k).
  - Radon - The radon program has been a long standing effort in the Army. The most recent version of AR 200-1 focuses on the need to maintain and update records of radon assessments (AR 200-1, para 9-2b). Occupants of facilities which contain elevated radon levels are required to be notified in writing and the Medical Officer must be notified of elevated radon levels (AR 200-1, para 9-2c and 9-2g). All radon test results must be attached to real property records and transferred with property when property is transferred (AR 200-1, para 9-2d). Radon must be measured in new or converted facilities (AR 200-1, para 9-2e, 9-2f, and 9-2i).
  - Radon Mitigation - Mitigation of structures must be done according to the U.S. Army Center for Public Works (CPW) guidance (AR 200-1, para 9-2h).
  - Lead Based Paint (LBP) Management - Paints and coatings containing above 0.06 percent lead by weight of the total non-volatile content cannot be applied to: buildings or structures; steel structures; playground equipment; or road lines or curbs (AR 200-1, para 4-6c). All existing stocks of LBP are required to be turned in to DRMO (AR 200-1, para 4-6c). Emissions of lead, lead dust, or LBP into the environment from deteriorated surfaces, building maintenance, demolition activities, or other sources are required to be reduced (AR 200-1, para 4-6e).

#### **E. Key Compliance Personnel**

##### *PCBs*

- The Directorate of Public Works (DPW), through the Exterior Electrical Shop, or the Environmental Coordinator (EC) is responsible for identifying, inspecting, marking (labeling), and properly servicing PCB Electrical Equipment (Transformers and Capacitors). Additionally, the DPW will help develop and maintain the PCB Management Plan or standard operating procedure (SOP) and the installations inventory of PCB equipment.
- The EC is responsible for ensuring that out-of-service items are located in a licensed and technically adequate PCB storage facility and preparing the annual PCB report. Normally, such facilities are located at a Defense Reutilization and Marketing Office (DRMO), and the DRMO is responsible for storage, disposal, transportation, and disposal contracts. Additionally, the EC will help develop and maintain the PCB SOP and the installations inventory of PCB equipment.

##### *Asbestos*

- DPW establishes an installation asbestos management team and appoints an asbestos management control officer (often the EC) or team leader. The DPW will also maintain records of asbestos survey results, plans, waste asbestos disposal records, and updates the records as changes occur. DPW will maintain records for 30 yr after the last incidence of employee exposure to asbestos.
- Asbestos Management Control Officer provides oversight for contract asbestos abatement operations. They will perform NESHAPs notifications and will be notified if there are asbestos exposure incidents or enforcement actions. They will issue a cease work order or delay start of work in order to prevent safety or environmental regulatory violations.

- Asbestos Management Team prepares the Asbestos Management Plan which contains documentation on all asbestos management efforts and the mechanism for oversight of the program. The team, as a minimum, consists of representatives from DPW, Environmental Office, Preventive Medicine Services (PMS), Safety Office, Civilian Personnel Office (CPO), Staff Judge Advocate (SJA), and Public Affairs Office (PAO).
- PMS performs the medical surveillance on individuals performing in-house asbestos abatement.

#### *Radon*

- EC is responsible for review of radon assessments and implementation of radon mitigation activities.

#### *Lead-Based Paint*

- Installation Medical Officer handles LBP health related and exposure issues (AR 200-1, para 4- 6f).
- EC participates in LBP survey and abatement activities.
- DPW notifies family housing occupants of known or suspected LBP hazards.

### **F. Key Army/DOD Compliance Definitions**

- *Activity* - a unit, organization, or installation that performs a function or mission (AR 200-1, Glossary, Section II).
- *Building* - a facility with occupiable space, usually with flooring, covered by a roof, enclosed by walls, and sited on a tract of land. Maintenance, storage, production, administration, health care, family housing, and unaccompanied personnel housing are examples of buildings (AR 420-70, Glossary, Section II) [**Added April 2000**].
- *Child-occupied Facilities* - buildings, or portions of buildings, constructed prior to 1978, visited regularly by the same child, 6 yr old age or under, on at least two different days within any week, provided that each day's visit lasts at least 3 h and the combined weekly visit lasts at least 6 h and the combined annual visits at least 60 h. Child-occupied facilities may include, but are not limited to, day-care centers, pre-schools, kindergarten classrooms, and family child care homes (AR 420-70, Glossary, Section II) [**Added April 2000**].
- *Facility* - buildings, structures, public works, equipment, aircraft, vessels, and other vehicles and property under control of, or constructed or manufactured for leasing to the Army (AR 200-1, Glossary, Section II).
- *Industrial Installation* - an installation that has the primary mission of producing, maintaining, or rehabilitating military material (AR 200-1, Glossary, Section II).
- *Installation Commander* - as used in AR 200-1, this includes Civil Works commanders, Laboratory Directors, Commanders of Field Operating Agencies (FOA), Major Subordinate Command (MSC) commanders, State Adjutants General, commanders of U.S. Army Reserve Regional Support Commands (RSC), and Outside the Continental United States (OCONUS) ASG and BSB commanders as appropriate as determined by the Major Command (MACOM). Civil Works commanders include U.S. Army Corps of Engineers (USACE) division, district, and laboratory commanders (AR 200-1, para 1-27).
- *Lead-based Paint (LBP)* - when in liquid form, LBP is any paint that contains more than 0.06% lead by weight (calculated as lead metal) in the total nonvolatile content of the liquid paint. When applied to a surface (in situ), any paint which tests greater than 1.0 mg/cm<sup>2</sup> when using x-ray fluorescence analyzer or 0.5% by weight when using atomic absorption spectroscopic analysis (AR 420-70, Glossary, Section II) [**Added April 2000**].

- *Lead-contaminated Paint* - paint that contains any detectable amount of lead (AR 420-70, Glossary, Section II) [Added April 2000].
- *Lead Hazard* - any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or lead-contaminated paint that is deteriorated or present on accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects. Lead hazards identified through risk assessments are referred to by HUD and USEPA as lead-based paint hazards (AR 420-70, Glossary, Section II) [Added April 2000].

#### **G. Records To Review in Addition to Those Listed in TEAM Guide**

- Radon testing results
- Radon mitigation plans
- Radon annual reports

#### **H. Physical Features To Inspect in Addition to Those Listed in TEAM Guide**

- None

#### **I. People To Interview**

- Directorate of Public Works (DPW)
- Environmental Coordinator (EC)
- Safety and Health Officer
- Fire Department
- Chief of Operations and Maintenance (O&M)
- Defense and Reutilization Marketing Office (DRMO)
- Utilities Division (Exterior Electric Shop)
- Preventive Medicine Personnel



## J. Guidance for Active Army Toxic Substances Management Checklist Users

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	<b>REFER TO CHECKLIST ITEMS:</b>
PCB Management	
All Installations	T1.1.1.A through T1.1.4.A
Pollution Prevention/Risk Management/Positive Findings	T1.2.1.A through T1.2.3.A
General	T1.10.1.A through T1.10.3.A
PCB Items	T1.30.1.A and T1.30.2.A
Asbestos Management	
All Installations	T2.1.1.A through T2.1.12.A
Pollution Prevention/Risk Management/Positive Findings	T2.2.1.A through T2.2.3.A
Radon	
All Installations	T3.1.1.A through T3.1.18.A
Pollution Prevention/Risk Management/Positive Findings	T3.2.1.A through T3.2.3.A
LBP Management	
All Installations	T4.1.1.A through T4.1.16.A
Pollution Prevention/Risk Management/Positive Findings	T4.2.1.A through T4.2.3.A

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<b>REGULATORY            REQUIREMENTS:</b>	<b>REVIEWER CHECKS:            June 2001</b>
<p><b>PCB MANAGEMENT</b></p> <p><b>T1.1            All Installations</b></p> <p><b>T1.1.1.A.</b> Copies of all relevant Federal, DOD, Army, state/local regulations, and guidance documents on PCBs, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP).</p> <p><b>T1.1.2.A.</b> Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters, etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).</p> <p><b>T1.1.3.A.</b> Installations with PCB equipment should establish procedures to ensure proper management, handling, and control of PCBs (MP) [February 1997].</p>	<p><b>SCS01: Copies of relevant Federal, DoD, Army, and state/local regulations are not available. (MP)</b></p> <p>Determine if copies of the following, which are applicable, are maintained on the installations:</p> <ul style="list-style-type: none"> <li>? AR 200-1, <i>Environmental Protection and Enhancement.</i></li> <li>? 40 CFR 761, <i>PCB Regulations.</i></li> <li>? EO 12088, <i>Federal Compliance with Pollution Standards.</i></li> <li>? applicable state and local regulations.</li> </ul> <p><b>SCS01: Management is not designed/conducted to prevent noncompliance and recurrence of noncompliance, preclude/minimize regulatory enforcement actions, promote good public relations, and/or address systemic weaknesses. (MP)</b></p> <p>Determine what management systems are in place.</p> <p>Verify that the existing system addresses the issues associated with PCB management by:</p> <ul style="list-style-type: none"> <li>? interviewing personnel</li> <li>? reviewing paperwork</li> <li>? observing the operation or activity.</li> </ul> <p>Determine if training is being conducted.</p> <p>Verify that installation environmental policies and regulations are sufficient and fully implemented.</p> <p>(NOTE: This MP is based on guidance found in Draft DA PAM 200-1, para 4-7a.)</p> <p><b>SCS01: The installation has not prepared PCB management procedures. (MP)</b></p> <p><b>SCS02: The PCB management procedures are incomplete and/or inaccurate. (MP)</b></p>

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<b>REGULATORY            REQUIREMENTS:</b>	<b>REVIEWER CHECKS:            June 2001</b>
<p><b>T1.1.4.A.</b> Army military and civil works personnel who handle or may potentially be exposed to PCBs are required to be trained (AR 200-1, para 4-4a and 4-4b) [<b>February 1997</b>].</p>	<p><i>(MP)</i></p> <p><i>SCS05: Copies of the PCB management procedures have not been provided to pertinent facility personnel. (MP)</i></p> <p><i>SCS06: A copy of the PCB management procedures are not available at pertinent facilities. (MP)</i></p> <p><i>SCS09: The PCB management procedures have not been implemented. (MP)</i></p> <p>Verify that the installation has established procedures that detail specific responsibilities, personnel training, inspection procedures, documentation, operation and management of storage areas, and safe handling practices.</p> <p><i>SCS01: Personnel with potential for exposure to PCBs are not trained.</i></p> <p><i>SCS02: Training for personnel with potential for exposure to PCBs is insufficient.</i></p> <p>Verify that Army military and civil works personnel who handle or may potentially be exposed to PCBs are trained to perform PCB-related responsibilities in a safe and environmentally sound manner.</p> <p>(NOTE: It is Army policy to manage PCBs in place unless operational, economic, or regulatory considerations justify removal.)</p> <p>(NOTE: The Draft DA PAM 200-1, para 4-7c requires that these personnel be identified to the installation medical officer for possible inclusion in a health monitoring program.)</p>

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<p><b>T1.2</b></p> <p><b>POLLUTION PREVENTION/RISK MANAGEMENT/ POSITIVE FINDINGS</b></p> <p><b>T1.2.1.A.</b> Installations should evaluate their operations/activities to identify and initiate opportunities for pollution prevention (MP) [Added January 1999].</p> <p><b>T1.2.2.A.</b> Risk management techniques should be promoted in environmental efforts (MP) [Added January 1999].</p> <p><b>T1.2.3.A.</b> Installations should go above and beyond statutory and regulatory compliance (MP) [Added January 1999].</p>	<p><i>SCS01: Installation has not evaluated their operations/activities to identify and initiate opportunities for pollution prevention in PCB management. (MP)</i></p> <p>Verify that the installation evaluates its operations/activities to identify and initiate opportunities for pollution prevention in PCB management.</p> <p>Determine if risk management techniques are promoted in environmental efforts.</p> <p><i>SCS01: Risk reduction for PCB management. (MP)</i></p> <p>Determine if the installation has gone above and beyond simply complying with environmental requirements.</p> <p><i>SCS01: The installation has gone above and beyond statutory and regulatory requirements. (Positive)</i></p>



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<b>REGULATORY REQUIREMENTS:</b>	<b>REVIEWER CHECKS: June 2001</b>
<p><b>PCBs</b></p> <p><b>T1.10 General</b></p> <p><b>T1.10.1.A.</b> Oil-filled equipment without analytical records or a manufacturer's label stating "NO PCBs" should be labeled as if it contains PCBs above 500 ppm (MP) [February 1997].</p> <p><b>T1.10.2.A.</b> Equipment containing small PCB items should be identified with a "CONTAINS PCB" label (MP) [February 1997].</p> <p><b>T1.10.3.A.</b> The IC should sign the annual PCB report (MP) [February 1997].</p>	<p><i>SCS01: Oil-filled equipment without analytical records or manufacturers label is not labeled indicating PCB content. (MP)</i></p> <p>Verify that oil-filled equipment without analytical records or a manufacturer's label stating "NO PCBs" is labeled as if it contains PCBs above 500 ppm until it has been analyzed.</p> <p>(NOTE: This MP is based on guidance found in the Draft DA PAM 200-1, para 4-7d.)</p> <p><i>SCS01: Equipment with small PCB items is not appropriately identified as containing PCBs. (MP)</i></p> <p>Verify that equipment containing small PCB items is identified with a "Contains PCB" label.</p> <p>(NOTE: Small PCB items are capacitors and other PCB bearing equipment under 3 lb.)</p> <p>(NOTE: This MP is based on guidance found in the Draft DA PAM 200-1, para 4-7d.)</p> <p><i>SCS01: The IC has not signed the annual PCB report. (MP)</i></p> <p>Verify that the IC signs the annual PCB report.</p> <p>(NOTE: This MP is based on guidance found in the Draft DA PAM 200-1, para 4-7h.)</p>







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<p><b>ASBESTOS MANAGEMENT</b></p> <p><b>T2.1 All Installations</b></p> <p><b>T2.1.1.A.</b> Copies of all relevant Federal, DOD, Army, state/local regulations, and guidance documents on asbestos, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP).</p> <p><b>T2.1.2.A.</b> Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters, etc.), promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).</p>	<p><b>SCS01: Copies of relevant Federal, DoD, Army, and state/local regulations are not available (MP).</b></p> <p>Determine if copies of the following, which are applicable, are maintained on the installations:</p> <ul style="list-style-type: none"> <li>? 40 CFR 61, Subpart M, <i>USEPA National Emission Standards for Asbestos.</i></li> <li>? 40 CFR 763, <i>Asbestos-Containing Materials in Schools.</i></li> <li>? AR 200-1, <i>Environmental Protection and Enhancement.</i></li> <li>? AR 385-10, <i>The Army Safety Program.</i></li> <li>? AR 405-90, <i>Disposal of Real Estate.</i></li> <li>? TB MED 502, <i>Occupational and Environmental Health: Respiratory Protection Program.</i></li> <li>? TB MED 513, <i>Occupational and Environmental Health Guidelines for the Evaluation and Control of Asbestos Exposure.</i></li> <li>? EO 12088, <i>Federal Compliance with Pollution Standards.</i></li> <li>? Under Secretary of Defense Letter, <i>Asbestos, Lead Paint, and Radon Policies at BRAC Properties.</i></li> <li>? applicable state and local regulations.</li> </ul> <p><b>SCS01: Management is not designed/conducted to prevent noncompliance and recurrence of noncompliance, preclude/minimize regulatory enforcement actions, promote good public relations, and/or address systemic weaknesses (MP).</b></p> <p>Determine what management systems are in place.</p> <p>Verify that the existing system addresses the issues associated with asbestos management by:</p> <ul style="list-style-type: none"> <li>? interviewing personnel</li> <li>? reviewing paperwork</li> <li>? observing the operation or activity.</li> </ul> <p>Determine if training is being conducted.</p> <p>Verify that installation environmental policies and regulations are sufficient and fully implemented.</p>

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<p><b>T2.1.3.A.</b> Installations are required to conduct an asbestos survey (AR 200-1, para 8-3b and AR 420-70, para 3-7b) [February 1997, Citation Revised April 2000].</p>	<p><i>SCS01: The installation has not conducted an asbestos survey.</i></p> <p><i>SCS02: The asbestos survey was incomplete and/or inadequate.</i></p> <p>Verify that an installation wide survey was completed.</p> <p>Verify that the survey(s) was completed by accredited personnel who met the inspector training requirements of AHERA, and applicable Federal, state, and local requirements.</p> <p>Verify that personnel were supervised by a qualified industrial hygienist or other qualified environmental professional who meets the requirements of a competent person as specified in 29 CFR 1926.58(b).</p> <p>Verify that as a priority, surveys were conducted in all housing units and in those buildings which will be renovated, demolished, or transferred from Army use.</p> <p><i>SCS06: Asbestos survey follow-up inspections are not performed by accredited personnel.</i></p> <p><i>SCS07: Asbestos survey follow-up inspections are not performed.</i></p> <p>Verify that the periodic followup inspections are being done by accredited personnel to identify and report damage and deterioration of asbestos.</p>
<p><b>T2.1.4.A.</b> Installations are required to prepare, coordinate, and execute an Installation Asbestos Management Plan (AR 200-1, para 8-2h and 8-3; AR 420-70, para 3-7d) [February 1997, Revised April 2000].</p>	<p><i>SCS01: The installation has not prepared an Asbestos Management Plan.</i></p> <p><i>SCS02: The Asbestos Management Plan is incomplete and/or inaccurate.</i></p> <p><i>SCS05: Copies of the Asbestos Management Plan have not been provided to pertinent facility personnel.</i></p> <p><i>SCS03: The Asbestos Management Plan has not been implemented.</i></p> <p><i>SCS07: A copy of the Asbestos Management Plan is not available at pertinent facilities.</i></p> <p>Verify that an Installation Asbestos Management Plan has been prepared.</p> <p>Verify that the plan contains the following information:</p> <ul style="list-style-type: none"> <li>? a complete list of operations and maintenance schedules, design plans, and specifications that identify structures scheduled for repair, alteration, and demolition</li> <li>? an installation-wide survey of all structures</li> <li>? an exposure assessment and risk assessment of each location containing</li> </ul>

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<p><b>T2.1.5.A.</b> Checklist item deleted [Deleted February 1997].</p> <p><b>T2.1.6.A.</b> Checklist items deleted [Deleted February 1997].</p> <p><b>T2.1.7.A.</b> Checklist item deleted (MP) [Deleted February 1997].</p> <p><b>T2.1.8.A.</b> Employees working with asbestos are required to have physical examinations (TB MED 513).</p> <p><b>T2.1.9.A.</b> Real property that contains ACM must be</p>	<p>asbestos</p> <ul style="list-style-type: none"> <li>? preparation and implementation of an asbestos abatement plan for each location containing asbestos</li> <li>? preparation and implementation of a special O&amp;M plan for each location containing asbestos</li> <li>? provisions for worker education/training programs</li> <li>? an environmental impact analysis for the Asbestos Management Plan.</li> </ul> <p>(NOTE: Under AR 420-70, the asbestos hazard management plan is required to:</p> <ul style="list-style-type: none"> <li>? include provisions for training of workers, work practices, abatement alternatives, in-place management work practices, surveillance monitoring, state or local reporting requirements, and environmental response procedures</li> <li>? include an environmental impact analysis</li> <li>? base abatement decisions on factors that include hazard assessments, initial and long-term costs, and projected utilization and useful life of facilities.)</li> </ul> <p>Checklist item deleted.</p> <p>This checklist item is now incorporated into T2.1.3.A.</p> <p>Checklist item deleted.</p> <p><b>SCS01: Personnel working with asbestos are not given physical examinations.</b></p> <p><b>SCS05: Physical examinations of personnel working with asbestos are inadequate.</b></p> <p>Verify that all employees working with asbestos are given physical examinations as required by TB MED 513:</p> <ul style="list-style-type: none"> <li>? before beginning work with asbestos</li> <li>? annually while employed</li> <li>? at termination of employment.</li> </ul> <p><b>SCS01: Excess real property containing asbestos is not adequately decontaminated.</b></p>

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<p>disposed of according to specific parameters (AR 405-90, para 2-2b) <b>[February 1997]</b>.</p> <p><b>T2.1.10.A.</b> Installations are required to establish an Asbestos Management Team (AR 200-1, para 8-2e) <b>[February 1997]</b>.</p> <p><b>T2.1.11.A.</b> Installations are required to take immediate action where a possible asbestos related health hazard has been identified (AR 200-1, para 8-2i, 8-2j, 8-2k) <b>[February 1997]</b>.</p> <p><b>T2.1.12.A.</b> As a part of BRAC, all available information on the existence, extent, and condition of ACM will be incorporated into the Environmental Baseline</p>	<p><i>decontaminated.</i></p> <p>Verify that all excess real property containing asbestos is decontaminated to the extent necessary to protect public health, welfare, and the environment.</p> <p>(NOTE: Additional decontamination may be conducted when justified by the economic analysis.)</p> <p><b>SCS01: <i>The installation has not established an Asbestos Management Team.</i></b></p> <p>Verify that the installation has established an Asbestos Management Team.</p> <p><b>SCS01: <i>Action has not been taken to address possible asbestos related health hazard.</i></b></p> <p><b>SCS02: <i>Inappropriate action has been taken to address possible asbestos related health hazards.</i></b></p> <p>Verify that installations take immediate action where a possible asbestos-related health hazard has been identified.</p> <p><b>SCS04: <i>Facility occupants have not been notified of asbestos related health hazards.</i></b></p> <p>Verify that facility occupants are notified of any asbestos-related health hazard.</p> <p><b>SCS08: <i>Asbestos related health risks were not evaluated for alternative control actions.</i></b></p> <p>Verify that the relative health risks are assessed for alternative control actions.</p> <p>(NOTE: Asbestos should not be removed for the sole purpose of eliminating asbestos.)</p> <p><b>SCS01: <i>ACM information was not included in the EBS as a part of BRAC.</i></b></p> <p><b>SCS02: <i>Inaccurate/incomplete ACM information was included in the EBS as a part of BRAC.</i></b></p> <p>Verify that, as a part of BRAC, all available information on the existence, extent,</p>

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<p>Survey (EBS) (Under Secretary of Defense Letter, <i>Asbestos, Lead Paint, and Radon Policies at BRAC Properties</i>, 31 October 1994) [February 1997].</p>	<p>and condition of ACM is incorporated into the EBS.</p> <p>Verify that the information includes:</p> <ul style="list-style-type: none"> <li>? Reasonably available information on the type, location, and condition of asbestos in any building or improvement on the property</li> <li>? Any results of testing for asbestos</li> <li>? A description of any asbestos control measures taken for the property</li> <li>? Any available information on costs or time necessary to remove all or any portion of the remaining ACM, special studies or tests to obtain this material are not required</li> <li>? Results of a site specific update of the asbestos inventory performed to revalidate the condition of ACM.</li> </ul>



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<p><b>T2.2</b></p> <p><b>POLLUTION PREVENTION/RISK MANAGEMENT/ POSITIVE FINDINGS</b></p> <p><b>T2.2.1.A.</b> Installations should evaluate their operations/activities to identify and initiate opportunities for pollution prevention (MP) [Added January 1999].</p> <p><b>T2.2.2.A.</b> Risk management techniques should be promoted in environmental efforts (MP) [Added January 1999].</p> <p><b>T2.2.3.A.</b> Installations should go above and beyond statutory and regulatory compliance (MP) [Added January 1999].</p>	<p><i>SCS01: Installation has not evaluated their operations/activities to identify and initiate opportunities for pollution prevention in asbestos management (MP).</i></p> <p>Verify that the installation evaluates its operations/activities to identify and initiate opportunities for pollution prevention in asbestos management.</p> <p>Determine if risk management techniques are promoted in environmental efforts.</p> <p><i>SCS01: Risk reduction for asbestos management. (MP)</i></p> <p>Determine if the installation has gone above and beyond simply complying with environmental requirements.</p> <p><i>SCS01: The installation has gone above and beyond statutory and regulatory requirements. (Positive)</i></p>



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<p><b>RADON</b></p> <p><b>T3.1 All Installations</b></p> <p><b>T3.1.1.A.</b> Copies of all relevant Federal, DOD, Army, state/local regulations, and guidance documents on radon, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP).</p> <p><b>T3.1.2.A.</b> Management and organization of paperwork, materials, and personnel should be done in a manner that prevent, noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters, etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP).</p> <p><b>T3.1.3.A.</b> All Army installations are required to maintain and update records of radon assessments conducted under the Army Radon Reduction Program (AR 200-1, para 9-2b)</p>	<p><b>SCS01: Copies of relevant Federal, DoD, Army, and state/local regulations are not available (MP).</b></p> <p>Determine if copies of the following, which are applicable, are maintained on the installations:</p> <ul style="list-style-type: none"> <li>? AR 200-1, <i>Environmental Protection and Enhancement.</i></li> <li>? Under Secretary of Defense Letter, <i>Asbestos, Lead Paint, and Radon Policies at BRAC Properties.</i></li> <li>? applicable state and local regulations.</li> </ul> <p><b>SCS01: Management is not designed/conducted to prevent noncompliance and recurrence of noncompliance, preclude/minimize regulatory enforcement actions, promote good public relations, and/or address systemic weaknesses (MP).</b></p> <p>Determine what management systems are in place.</p> <p>Verify that the existing system addresses the issues associated with radon management by:</p> <ul style="list-style-type: none"> <li>? Interviewing personnel</li> <li>? Reviewing paperwork</li> <li>? Observing the operation or activity.</li> </ul> <p>Determine if training is being conducted.</p> <p>Verify that installation environmental policies and regulations are sufficient and fully implemented.</p> <p><b>SCS01: Radon assessments were not conducted.</b></p> <p><b>SCS02: The installation is not maintaining/updating radon assessment records.</b></p> <p><b>SCS03: The radon assessment records are incomplete/inadequate.</b></p> <p>Verify that Army installations maintain and update records of radon assessments</p>

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<p>[February 1997].</p> <p><b>T3.1.4.A.</b> Checklist item deleted [Deleted February 1997].</p> <p><b>T3.1.5.A.</b> Checklist item deleted [Deleted February 1997].</p> <p><b>T3.1.6.A.</b> Checklist item deleted [Deleted February 1997].</p> <p><b>T3.1.7.A.</b> Checklist item deleted [Deleted February 1997].</p> <p><b>T3.1.8.A.</b> Checklist item deleted [Deleted February 1997].</p> <p><b>T3.1.9.A.</b> Occupants of facilities which contain elevated radon levels are required to be notified in writing (AR 200-1, para 9-2c) [February 1997].</p>	<p>conducted under the Army Radon Reduction Program.</p> <p>(NOTE: According to Draft DA PAM 200-1, para 9-4b, records will include the building number, sample results, laboratory identification, date of placement, date of removal, and location within the structure. Also according to the draft, the priorities are as follows:  ? Priority One - day care centers, hospitals, schools, and living areas  ? Priority Two - areas having 24-h operations, such as operations and training centers or RDT&amp;E facilities  ? Priority Three - all other routinely occupied structures.)</p> <p>Checklist item deleted.</p> <p><i>SCS01: Occupants of facilities with elevated radon levels were not notified in writing of results and/or plans.</i></p> <p><i>SCS02: Incomplete/inaccurate information was provided to occupants of facilities with elevated radon levels.</i></p> <p>Verify that occupants of Priority One facilities are notified in writing of test results, planned or executed mitigation plans, and their results.</p> <p>Verify that, in Priority Two and Three facilities, the radon test results and</p>

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	information are distributed by the facility managers.
<b>T3.1.10.A.</b> Elevated radon levels are required to be identified to the Installation Medical Officer (AR 200-1, para 9-2g) [February 1997].	<p><i>SCS01: Elevated radon levels were not reported to the Installation Medical Officer.</i></p> <p>Verify that elevated radon levels are identified to the installation Medical Officer.</p>
<b>T3.1.11.A.</b> All radon test results are required to be attached to real property records and transferred with property when property is transferred (AR 200-1, para 9-2d) [February 1997].	<p><i>SCS01: Radon test results are not attached to real property records.</i></p> <p><i>SCS03: Radon test results were not transferred with property where property is sold, excessed, or transferred.</i></p> <p>Verify that all radon test results are attached to real property records and transferred with property when property is sold, excessed, or transferred.</p>
<b>T3.1.12.A.</b> Installations are required to perform mitigation of structures as required by measured results (AR 200-1, para 9-2h) [February 1997].	<p><i>SCS01: Mitigation of elevated radon levels was not performed according to the appropriate standards.</i></p> <p>Verify that the installation follows the U.S. Army Center for Public Works guidance on mitigation of elevated radon levels.</p>
<b>T3.1.13.A.</b> Checklist item deleted [Deleted February 1997].	Checklist item deleted.
<b>T3.1.14.A.</b> Checklist item deleted [Deleted February 1997].	Checklist item deleted.
<b>T3.1.15.A.</b> Checklist item deleted [Deleted February 1997].	Checklist item deleted.
<b>T3.1.16.A.</b> Checklist item deleted [Deleted February 1997].	Checklist item deleted.

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<p><b>T3.1.17.A.</b> Radon must be measured in new or converted facilities (AR 200-1, para 9-2e, 9-2f, 9-2i) <b>[February 1997]</b>.</p> <p><b>T3.1.18.A.</b> As a part of BRAC, any available and relevant radon assessment data pertaining to the property being transferred will be included in property transfer documents (Under Secretary of Defense Letter, <i>Asbestos, Lead Paint, and Radon Policies at BRAC Properties</i>, 31 October 1994) <b>[February 1997]</b>.</p>	<p><b>SCS01: Radon has not been measured in new/converted facilities.</b></p> <p>Verify that radon is measured in newly constructed Army facilities.</p> <p><b>SCS05: Appropriate design criteria for radon reduction was not incorporated in new construction.</b></p> <p>Verify that in areas of high radon levels, radon is measured in facilities converted to housing and in continuously occupied structures prior to occupancy.</p> <p>(NOTE: USACE design criteria for radon reduction should be used in new construction.)</p> <p><b>SCS01: Radon assessment data was not included in BRAC property transfer documents.</b></p> <p><b>SCS03: Inaccurate radon assessment data was included in BRAC property transfer documents.</b></p> <p>Verify that, as a part of BRAC, any available and relevant radon assessment data pertaining to the property being transferred is included in property transfer documents.</p>

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<p><b>T3.2</b></p> <p><b>POLLUTION PREVENTION/RISK MANAGEMENT/ POSITIVE FINDINGS</b></p> <p><b>T3.2.1.A.</b> Installations should evaluate their operations/activities to identify and initiate opportunities for pollution prevention (MP) [Added January 1999].</p> <p><b>T3.2.2.A.</b> Risk management techniques should be promoted in environmental efforts (MP) [Added January 1999].</p> <p><b>T3.2.3.A.</b> Installations should go above and beyond statutory and regulatory compliance (MP) [Added January 1999].</p>	<p><i>SCS01: Installation has not evaluated their operations/activities to identify and initiate opportunities for pollution prevention in radon management (MP).</i></p> <p>Verify that the installation evaluates its operations/activities to identify and initiate opportunities for pollution prevention in radon management.</p> <p>Determine if risk management techniques are promoted in environmental efforts.</p> <p><i>SCS01: Risk reduction for radon management. (MP)</i></p> <p>Determine if the installation has gone above and beyond simply complying with environmental requirements.</p> <p><i>SCS01: The installation has gone above and beyond statutory and regulatory requirements. (Positive)</i></p>



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<p><b>LBP MANAGEMENT</b></p> <p><b>T4.1 All Installations</b></p> <p><b>T4.1.1.A.</b> Copies of all relevant Federal, DOD, Army, state/local regulations, and guidance documents on LBP, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation (MP) <b>[February 1997]</b>.</p> <p><b>T4.1.2.A.</b> Management and organization of paperwork, materials, and personnel should be done in a manner that prevents noncompliance and recurrence of noncompliance, precludes/minimizes regulatory enforcement actions (including warning letters, etc.) promotes good public relations, and addresses systemic weaknesses in the overall operation of the program (MP) <b>[February 1997]</b>.</p> <p><b>T4.1.3.A.</b> Installations should have an LBP management program (MP) <b>[February 1997]</b>.</p>	<p><b>SCS01: Copies of relevant Federal, DoD, Army, and state/local regulations are not available (MP).</b></p> <p>Determine if copies of the following, which are applicable, are maintained on the installations:</p> <ul style="list-style-type: none"> <li>? AR 40-5, <i>Preventive Medicine.</i></li> <li>? AR 200-1, <i>Environmental Protection and Enhancement.</i></li> <li>? AR 420-70, <i>Buildings and Structures.</i></li> <li>? EO 12088, <i>Federal Compliance with Pollution Standards.</i></li> <li>? applicable state and local regulations.</li> </ul> <p><b>SCS01: Management is not designed/conducted to prevent noncompliance and recurrence of noncompliance, preclude/minimize regulatory enforcement actions, promote good public relations, and/or address systemic weaknesses (MP).</b></p> <p>Determine what management systems are in place.</p> <p>Verify that the existing system addresses the issues associated with LBP management by:</p> <ul style="list-style-type: none"> <li>? interviewing personnel</li> <li>? reviewing paperwork</li> <li>? observing the operation or activity.</li> </ul> <p>Determine if training is being conducted.</p> <p>Verify that installation environmental policies and regulations are sufficient and fully implemented.</p> <p>(NOTE: This MP is based on guidance in the Draft DA PAM 200-1, para 4-9b.)</p> <p><b>SCS01: The installation has not prepared a LBP program. (MP)</b></p> <p><b>SCS02: The LBP program is incomplete and/or inaccurate. (MP)</b></p>

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<p><b>T4.1.4.A.</b> Installations must meet specific restrictions on the use of paints and coatings containing above 0.06 percent (600 ppm) lead by weight of the total non-volatile content (AR 200-1, para 4-6c) <b>[February 1997]</b>.</p> <p><b>T4.1.5.A.</b> Checklist item deleted <b>[Deleted April 2000]</b>.</p> <p><b>T4.1.6.A.</b> Military installations are required to turn in existing stocks of LBP to DRMO (AR 200-1, para 4-6c) <b>[February</b></p>	<p><i>SCS05: Copies of the LBP program have not been provided to pertinent facility personnel. (MP)</i></p> <p><i>SCS06: A copy of the LBP program is not available at pertinent facilities. (MP)</i></p> <p><i>SCS09: The LBP program has not been implemented. (MP)</i></p> <p>Verify that the installation has an LBP management program that:</p> <ul style="list-style-type: none"> <li>? Establishes procedures to manage LBP which does not pose an immediate health threat</li> <li>? Establishes procedures to ensure control of self-help and minor maintenance activities to prevent exposure to lead or released to the environment</li> <li>? Includes USEPA or state prescribed training</li> <li>? Establishes the funding requirements for LBP-related environmental actions</li> <li>? Ensures contracts involving the potential removal and disposal of lead contaminated materials at military installations are reviewed and approved by the environmental coordinator</li> <li>? Includes a lead hazard management team and written plan as described in PWTB 420-70-2.</li> </ul> <p><i>SCS01: Paints and coatings containing excess lead have been applied to inappropriate surfaces.</i></p> <p><i>SCS03: Paints and coatings containing excess lead have been requisitioned for use in inappropriate circumstances.</i></p> <p>Verify that paints and coatings containing above 0.06 percent (600 ppm) lead by weight of the total nonvolatile content are not specified, requisitioned, or applied to:</p> <ul style="list-style-type: none"> <li>? buildings or structures (residential or nonresidential), to include interior or exterior building surfaces</li> <li>? steel structures</li> <li>? playground equipment</li> <li>? road lines or curbs.</li> </ul> <p>This checklist item was deleted due to a revision in the regulation.</p> <p><i>SCS01: Stocks of LBP remain at the installation.</i></p> <p>Verify that the installation has turned in all stocks of LBP to DRMO.</p>

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<p><b>1997].</b></p> <p><b>T4.1.7.A.</b> Installations are required to reduce the release of lead, lead dust, or LBP into the environment from deteriorated paint surfaces, building maintenance, demolition activities, or other sources on Army installations or Army controlled property (AR 200-1, para 4-6e) <b>[February 1997].</b></p> <p><b>T4.1.8.A.</b> As a part of BRAC, housing constructed prior to 1978 is required to be inspected prior to property conveyance (Under Secretary of Defense Letter, <i>Asbestos, Lead Paint, and Radon Policies at BRAC Properties</i>, 31 October 1994) <b>[February 1997].</b></p> <p><b>T4.1.9.A.</b> BRAC installations are required to abate LBP hazards in target housing facilities constructed prior to 1960 (Under Secretary of Defense Letter, <i>Asbestos,</i></p>	<p><b>SCS01: <i>Lead, lead dust, or LBP was released the environment as a result of Army activities.</i></b></p> <p>Verify that the installation reduces the release of lead, lead dust, or LBP into the environment from deteriorated paint surfaces, building maintenance, demolition activities, or other sources on Army installations or Army controlled property.</p> <p>(NOTE: Review the lead hazard management program, contract documents, etc. to see if proper measures (i.e., HUD Guidelines, National Institute of Building Sciences O&amp;M Work Practices Manual, COE or NIBS Guidance specifications, etc.) are specified and are verified by sampling during jobs.)</p> <p><b>SCS01: <i>Housing built prior to 1978 was not inspected for LBP under BRAC.</i></b></p> <p><b>SCS02: <i>Inspection of housing built prior to 1978 for LBP under BRAC was incomplete/inadequate.</i></b></p> <p>Verify that housing scheduled for disposal under BRAC which was constructed prior to 1978 is inspected for LBP and LBP hazards.</p> <p><b>SCS05: <i>LBP inspection results for housing built prior to 1978 were not provided to appropriate individuals.</i></b></p> <p>Verify that the results of this inspection are provided to prospective purchasers or transferees of BRAC property.</p> <p>(NOTE: Inspection is not required when the building is scheduled for demolition by the transferee and the transfer document prohibits occupation of the building prior to the demolition, and the building is scheduled for nonresidential use. If the building is scheduled for residential use, the transferee conducts renovation consistent with the regulatory requirements for the abatement of LBP hazards.)</p> <p>(NOTE: The installation can negotiate with the transferee as to who pays for risk assessments or inspections.)</p> <p><b>SCS01: <i>LBP hazards in target housing were not abated at BRAC facilities.</i></b></p> <p><b>SCS04: <i>Abatement of LBP hazards in target housing at BRAC facilities was inadequate.</i></b></p> <p>Verify that inspections for LBP and LBP hazards are performed and the hazards are</p>

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<p><i>Lead Paint, and Radon Policies at BRAC Properties, 31 October 1994) [February 1997].</i></p> <p><b>T4.1.10.A.</b> Installations are required to use accredited laboratories for the quantitative measurement of lead in paint, dust, and soil (AR 200-1, para 46(j)) [May 1997].</p> <p><b>T4.1.11.A.</b> Installations are required to conduct an environmental impact analysis for lead hazard control and LBP activities (AR 200-1, para 4-6(k)) [May 1997].</p> <p><b>T4.1.12.A.</b> Installations are required to establish a lead hazard management team (AR 420-70, para 3-2b) [Added April 2000].</p> <p><b>T4.1.13.A.</b> Specific actions are required to be done in relation to lead-contaminated paint (AR 420-70, para 3-4c and 3-4d) [Added April 2000].</p>	<p>abated for housing constructed prior to 1960.</p> <p><i>SCS01: Non-accredited laboratory was used for lead content analysis.</i></p> <p>Verify that the installation has used laboratories accredited under the National Lead Laboratory Accreditation Program for the quantitative measurement of lead in paint, dust, and soil.</p> <p><i>SCS01: No environmental impact analysis performed for lead hazard control or LBP activities.</i></p> <p><i>SCS02: Insufficient environmental impact analysis performed for lead hazard control or LBP activities.</i></p> <p>Verify that if lead hazard control and LBP activities are occurring, the installation has conducted an environmental impact analysis as required in AR 200-2.</p> <p><i>SCS01: No lead hazard management team.</i></p> <p><i>SCS03: Inadequate lead hazard management team.</i></p> <p>Verify that the installation has a lead hazard management team that consists of representatives from the following:</p> <ul style="list-style-type: none"> <li>? DPW</li> <li>? medical</li> <li>? environmental</li> <li>? housing</li> <li>? safety</li> <li>? legal</li> <li>? PAO.</li> </ul> <p><i>SCS01: Inadequate risk assessment of lead hazards at facilities which contain lead-contaminated paint.</i></p> <p>Verify that risk assessments are done to identify lead hazards are performed for facilities which contain lead-contaminated paint.</p>

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<p><b>T4.1.14.A.</b> Lead-contaminated bare soil will be managed by interim controls (AR 420-70, para 3-4e) <b>[Added April 2000]</b>.</p> <p><b>T4.1.15.A.</b> The assessment, management, and abatement of LBP hazards will be done according to certain parameters (AR 420-70, para 3-4b and 3-4f) <b>[Added April 2000]</b>.</p> <p><b>T4.1.16.A.</b> The disposition of Army facilities with LBP will be done according to specific parameters (AR 420-70, para 3-5) <b>[Added April 2000]</b>.</p>	<p>(NOTE: Paint in pre-1978 child-occupied facilities is assumed to be lead-contaminated, unless testing determines otherwise.)</p> <p><b>SCS03: <i>Inappropriate management of identified lead hazards.</i></b></p> <p>Verify that identified lead hazards are managed by interim controls.</p> <p>(NOTE: Lead-contaminated paint will only be abated when interim controls are ineffective or when economically justified for major repair or whole neighborhood revitalization projects. Lead-contaminated paint will not be removed solely for the purpose of abatement.)</p> <p><b>SCS01: <i>Inadequate management of bare lead-contaminated soil.</i></b></p> <p>Verify that lead-contaminated bare soil is managed by interim controls unless economic, operational, or regulatory requirements dictate removal and disposal.</p> <p><b>SCS01: <i>Inadequate assessment, management, and abatement of LBP hazards.</i></b></p> <p>Verify that the assessment, management, and abatement of LBP hazards is done according to the Department of Housing and Urban Development (HUD) "Guidelines for the Evaluation and Control of Lead-Based Pain Hazards in Housing".</p> <p>Verify that the following are used in the preparation of lead abatement specifications for buildings and steel structures:</p> <p>    ? U.S. Army Corps of Engineers Guide Specification CEGS-02090     ?? Civil works Guide Specification CECW-09940.</p> <p><b>SCS01: <i>Inadequate disposition of Army facilities with LBP.</i></b></p> <p>Verify that the following standards are met for the disposition of Army facilities with LBP:</p> <p>    ? 24 CFR, Subtitle A, Part 35, Subpart E (guidance on elimination of LBP hazards in pre-1978 Army housing that is sold for residential habitation)     ? 24 CFR, Subtitle A, Part 35, Subpart H (guidance on disclosure and other specific requirements to purchasers of Army housing constructed before 1978).</p> <p>(NOTE: 24 CFR, Subtitle A, Part 35, Subpart E will be superseded upon implementation of Section 1013, Disposition of Federally Owned Housing, of the LBP Hazard Reduction Act of 1992.)</p>

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<b>REGULATORY REQUIREMENTS:</b>	<b>REVIEWER CHECKS: June 2001</b>
<p><b>T4.2</b></p> <p><b>POLLUTION PREVENTION/RISK MANAGEMENT/ POSITIVE FINDINGS</b></p> <p><b>T4.2.1.A.</b> Installations should evaluate their operations/activities to identify and initiate opportunities for pollution prevention (MP) [Added January 1999].</p> <p><b>T4.2.2.A.</b> Risk management techniques should be promoted in environmental efforts (MP) [Added January 1999].</p> <p><b>T4.2.3.A.</b> Installations should go above and beyond statutory and regulatory compliance (MP) [Added January 1999].</p>	<p><i>SCS01: Installation has not evaluated their operations/activities to identify and initiate opportunities for pollution prevention in LBP management (MP).</i></p> <p>Verify that the installation evaluates its operations/activities to identify and initiate opportunities for pollution prevention in LBP management.</p> <p>Determine if risk management techniques are promoted in environmental efforts.</p> <p><i>SCS01: Risk reduction for LBP management. (MP)</i></p> <p>Determine if the installation has gone above and beyond simply complying with environmental requirements.</p> <p><i>SCS01: The installation has gone above and beyond statutory and regulatory requirements. (Positive)</i></p>

