

Safe Homes Initiative

Frequently Asked Questions Additions

What actions are classified as lead abatement?

Any measure designed to permanently eliminate lead paint or lead paint hazards. The US EPA and HUD recognize the following methods as abatement:

- Removal of the building component: Removing a door, window sill, hand rail, etc. coated with lead paint intact and in whole for proper disposal;
- Removal of the lead paint from components: Complete removal of all lead paint from surfaces or components down to bare substrate by an EPA certified lead firm;
- Enclosure of the component: installation of rigid, durable barriers that are mechanically attached to building components, with all edges and seams sealed. Surfaces with lead paint are enclosed to prevent access and exposure and to provide a dust-tight system expected to last at least 20 years under normal conditions.
- Encapsulation of lead-based paint: A process that makes lead-based paint inaccessible by providing a barrier between the lead-based paint and the environment. This barrier is formed using a special liquid-applied coating (with or without reinforcement materials) or an adhesively bonded covering material that meets EPA, ASTM or state standards and warranted by the manufacturer for at least 20 years; or
- Soil removal or covering: Several options exist to abate soil lead hazards including: covering with a resilient, impervious surface material such as asphalt or concrete (all levels of contamination); removing/replacing the top 6" of soil (high contamination); and soil amendment and treatments (moderate to low contamination).

How does Abatement differ from Interim Controls?

Interim controls are intended to make dwellings lead-safe quickly by temporarily controlling lead-based paint hazards, while abatement is intended to permanently control lead-based paint hazards and eliminate exposure risks. Coast Guard policy requires that all lead hazards (Action Level or Major Findings) identified in housing be promptly reduced to the Monitoring Level. In most instances, this is achieved by implementing effective interim controls to temporarily mitigate exposure risks followed by abatement actions to permanently control the hazards.

For example, a local housing officer (LHO) identifies paint chips and dust on a window sill and adjacent living room floor produced by the friction surfaces of a window, which constitutes a Major Finding given that small children occupy the housing unit. Appropriate interim controls would be to notify occupants of the lead hazard, restrict access to the contaminated area (especially to children) until cleaned by a certified lead firm and confirmed safe by clearance sampling, secure the window to prevent opening/closing, and increase surveillance and inspection frequency in the housing unit by the LHO. Simultaneously, the unit should engage the cognizant area housing officer and facility engineers to plan for proper abatement (likely window removal and replacement), which is required to be completed in one year according to policy.

What is the difference between paint stabilization and encapsulation?

- Paint stabilization is an interim control (not abatement) that entails removing deteriorating paint, preparing the substrate for repainting, and repainting with conventional household paints to temporarily stabilize damaged lead paint surfaces and temporarily mitigate lead exposure risks.
- Encapsulation can be used as an interim control or abatement and uses special coatings that adhere and bond with the existing lead paint to form a protective barrier. For encapsulation to be considered abatement, the encapsulants must meet appropriate federal and consensus standards, be applied in

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accordance with the manufacturer's requirements and be warranted by the manufacturer for at least 20 years. Typically, the word encapsulation is used in reference to abatement (long-term) and paint stabilization is used to refer to interim controls (short-term).

Does abatement apply only to the immediate area where the lead hazard finding is located or does the entire room or home require abatement?

First, it is essential to clearly understand the definition of a *lead finding*. As shown in the original ERA inspection reports and recorded in HMIS, lead findings represent specific building components such as stair railing, doors, trim, windows, interior sills, etc. as defined by state-certified lead inspectors based upon building component functions and painting history. This was completed for nearly all Coast Guard Housing units between 1995 and 1999 and the lead findings are recorded in HMIS.

As an example, a lead inspector may record an entire window as a single lead finding or record the window components (interior sill, exterior sill, trough, sash, apron, parting bead, stop bead, casing, etc.) as separate lead findings. However, because it is highly unlikely that all these components have different painting histories, entire windows are normally recorded as a single lead finding unless the inspector's professional judgment and field condition dictate otherwise.

All lead exposure risks identified by the state-certified risk assessor as Action Level or Major Findings require interim controls followed by abatement. For example, if the certified lead risk assessment identifies Action Level findings in the bedroom #1 on the closet door frame, then the damaged lead paint on the door frame would require interim controls to return it to the Monitoring Level. However, for the required abatement, the answer depends upon how the lead finding is defined/recorded by the lead inspector (original ERA assessment and HMIS records). So, if the entire door frame is recorded as a single lead finding, then the entire door frame must be abated to permanently remove the lead hazard from that component.

Also, can we just perform "spot" abatement or partial abatement that just addresses the current lead paint damage?

The short answer is no. Interim controls are employed to temporarily mitigate risks often using "spot" paint stabilization approach followed by dust clean up, etc. However, as mentioned above, abatement is different and must address the *lead finding* as defined in the original lead inspector's reports and recorded as findings in HMIS. As decided by CG senior leadership over 25 years ago, the intent of the SEH lead in housing policy is to manage lead paint in place and systematically eliminate the hazards over time through abatement as lead paint failures occur.

So, the policy expectation is that each time an Action Level or Major Finding is identified, an HMIS finding will be marked abated within the database within 3 years and 1 year, respectively. Spot abatements do not allow any HMIS Findings to be marked abated and only serves to complicate understanding regarding the locations of remaining lead paint hazards. In other words, unless all building components in an HMIS lead finding are fully abated at once, then all of the components must still be treated as lead paint. The practice of conducting partial abatements does not ultimately result in any long-term hazard control or safety gains for Coast Guard, but can and does result in a false sense of security, reduced awareness regarding lead hazard locations and significant funding losses due to recurrent abatement actions on the same surfaces.

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What qualifications are needed to perform lead paint stabilization, dust removal from sills or floors, etc.?

Coast Guard policy requires all asbestos and lead Action Level and Major Findings be corrected by contractors licensed to perform asbestos and/or lead work and not by Coast Guard personnel. Therefore, when paint stabilization and dust removal are conducted in order to address, correct and reclassify Action Level or Major Findings to the Monitoring Level, the workers and the supervisor must be EPA-certified renovators, or, if any of the workers are not certified renovators, the supervisor must be a certified lead-based paint abatement supervisor in addition to being a certified renovator.

The SEH Manual states that Major Findings require immediate interim control measures. What is the definition of immediate? Does immediate apply to Action Level Findings as well?

Immediate signifies a high priority and generally means “without hesitation”. Often, the first interim controls are to notify the residents of the hazard and restrict access whenever possible. Still, interim control measures will differ based upon the exposed population, access to the hazard, lead concentrations, etc. The occupants are expected to be part of the prevention efforts through proper hazard disclosure and understanding the measures that they can employ to reduce exposure risks. Whether Major Findings or Action Level findings, all efforts to mitigate lead exposure risks should be immediate and without hesitation.

Can Major Findings be downgraded to Action Level Findings if the at-risk family is removed from the home?

If susceptible occupants are removed from a housing unit containing Major Findings, by policy, the hazards would constitute Action Level findings providing susceptible populations will not be allowed to occupy the housing units and interim controls have returned the conditions to the Monitoring Level.

Can at-risk families be assigned to a home with Action Level or Major Findings once effective interim controls are in place?

Housing assignment is a CG-1333/Housing Authority decision. From a safety perspective, Coast Guard SEH policy focuses on ensuring that hazards and exposure risks in housing units are mitigated through interim controls and ultimately eliminated through abatement to provide a healthy and safe living environment for CG families. Therefore, ensuring that all lead paint and hazards in CG housing are maintained at the Monitoring Level is the highest priority.