



DEPARTMENT OF THE ARMY
UNITED STATES ARMY INSTALLATION MANAGEMENT AGENCY
EUROPE REGION OFFICE
UNIT 29353, BOX 200
APO AE 09014-0200

IMEU-PWD-E

14 September 2005

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Lead-Based Paint Hazard Management Guidance for Playgrounds

1. References:

a. Environmental Final Governing Standards (FGS) for Belgium, Germany, Italy, and the Netherlands, chapter 17.

b. AR 200-1, Environmental Protection and Enhancement, chapter 4, 21 February 1997.

c. AR 420-70, Buildings and Structures, chapter 3, 10 October 1997.

d. Environmental Protection Agency Pamphlet EPA747-K-99-001, Protect Your Family From Lead In Your Home, June 2003 (encl 1).

2. Chapter 17 of the FGS (para 1a) requires overseas DOD installations to develop and implement a multidisciplinary lead-based paint (LBP) hazard-management program. This program must identify, evaluate, and reduce LBP and LBP hazards in facilities (including playgrounds) occupied by children 6 years old and under.

3. Garrisons must perform annual risk assessments on playground equipment based on the following priorities:

a. Age of equipment.

b. Condition of paint, other similar surface-coating material, plastic component, or fiberglass component.

c. Place of manufacture.

d. Supplier history.

4. In addition to the annual risk assessments in paragraph 3, garrisons must perform annual risk assessment screenings on equipment in relatively good condition even though the probability of finding LBP or LBP hazards is low.

5. Garrisons must disclose and manage the presence of any known LBP or LBP hazards associated with playgrounds based on the hazard levels in enclosure 2. As a minimum, garrisons

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will provide the pamphlet in enclosure 1 to community members. (This pamphlet is available at <http://www.epa.gov/opptintr/lead/leadpdf.pdf>.) In addition, garrisons will manage LBP and LBP hazards according to AR 420-70, chapter 3.

6. To minimize LBP and LBP hazard recurrences, garrisons must ensure playground equipment procurement contracts include a clause stating the paints and other similar surface-coating materials (including pigments used in plastic and fiberglass components) must meet the standards of the United States Consumer Product Safety Commission or European Norm (EN), whichever is more stringent. When performing in-house or contract playground equipment maintenance, garrisons must ensure paints do not contain lead greater than 0.06 percent by dry weight (AR 200-1, chap 4).

7. The POC is Mr. Karl Weighmann, e-mail: karl.weighmann@ima-e.army.mil, DSN 370-6393.



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2 Encls

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Table 1. Lead (Pb) Hazard Levels

	Paint-Lead	Dust-Lead	Soil-Lead
Sampling Media	See note below. ¹		
Paint or Similar Surface Coating Material (Good Condition)⁶	≥ 1 mg/cm ² or 0.5% ^{2,3}		
Paint or Similar Surface Coating Material (Less than Good Condition)⁷	> 0.12 mg/cm ² or 0.06% ^{2,3}		
Bare Soil (Play Area)			≥ 400 ppm
Plastic/Fiberglass		See notes below. ^{4,5}	

¹**Note:** Lead (Pb) in paint is measured as mg/cm² or % Pb by weight. Pb in dust is measured as mass-per-area concentration of lead based on wipe samples. Pb in Bare Soil (Play Area) is measured as Total Pb based on soil samples.

²**Note:** Pb in paint is measured as % by weight of the total nonvolatile content of the paint or the weight of the dried paint film.

³**Note:** Lead-based paint is still legally available for purchase throughout the EU. However, in German and Italy, it is prohibited to use paints containing anhydrous, neutral lead carbonate, lead hydrocarbonate or lead sulfate, except for the maintenance or restoration of works of art and historic components. In addition per AR 200-1, Chapter 4, Section 4-6.c., paints and coatings containing above 0.06% (600 ppm) Pb as measured in Note 2 will not be applied to playground equipment. In addition, such paints and coatings will also not be specified in or requisitioned as part of any procurement contracts or purchase orders.

⁴**Note:** Per Title 16 U.S. Code of Federal Regulations (CFR) Section 1303.2(b)(1), the lead-containing paint **definition (0.06 percent by weight of the total nonvolatile content of the paint or the weight of the dried paint film)** does not apply to plastic/fiberglass playground equipment surfaces, unless the surface is actually coated with paint or other similar surface-coating materials that are either not part of the substrate or not bonded to the substrate.

⁵**Note:** Since no Federal dust-lead hazard standards exist for dust on plastic/fiberglass, the EPA dust-lead hazard level of ≥ 40 µg/ft² for lead in dust on residential floors is used as surrogate criteria.

⁶**Note:** The condition of the surface is such that exposure to lead **is not likely** and would not result in adverse human health effects. Per AR 420-70 Section 3-4.d., abatement is only required when economically justified or when interim controls are ineffective. Interim controls shall include, at a minimum, continual monitoring for LBP hazards or potential hazards and implementing resident education programs.

⁷**Note:** The condition of the surface is such that exposure to lead **is likely** and would result in adverse human health effects. Per AR 420-70 Section 3-4.d., abatement is only required when economically justified or when interim controls are ineffective. Interim controls include specialized cleaning, repairs, maintenance, painting, temporary containment, continual monitoring of lead-based paint hazards or potential hazards, and implementing resident education programs.