



COMDTINST 6260.1A
08 OCT 2004

COMMANDANT INSTRUCTION 6260.1A

Subj: ASBESTOS, LEAD AND RADON IN COAST GUARD HOUSING

- Ref:
- a) Asbestos Containing Materials in Schools, 40 CFR Part 763
 - b) Asbestos Exposure Control Manual, COMDTINST M6260.16 (series)
 - c) HUD Technical Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, www.hud.gov/offices/lead/guidelines/hudguidelines/index.cfm
 - d) EPA Lead-based Paint Poisoning Prevention in Certain Residential Structures, 40 CFR 745
 - e) National Primary Drinking Water Regulations, 40 CFR 141.80 and 141.86
 - f) A Citizen's Guide to Radon: The Guide to Protecting Yourself and Your Family From Radon (4th ed.) www.epa.gov/iaq/radon/pubs/citguide.html
 - g) Consumer's Guide to Radon Reduction www.epa.gov/iaq/radon/pubs/consguid.html
 - h) Civil Engineering Manual, COMDTINST M11000.11.A
 - i) Maintenance Assessment Guide for Coast Guard Housing, COMDTPUB P11101.21 (series)
 - j) Center for Disease Control and Prevention (CDC), "Screening Young Children for Lead Poisoning: Guidance for State and Local Public Health Officials" www.cdc.gov/nceh/lead/guide/guide97.html
 - k) Real Property Asset Management Manual, COMDTINST M11011.10.
 - l) Safety and Environmental Health Manual, COMDTINST M5100.47 (series)

1. PURPOSE. To establish a safety and health risk assessment standard and prescribe responsibilities for the identification, evaluation and management of asbestos-containing materials (ACM), lead and radon in Coast Guard controlled housing and Child Development Centers (CDC).

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2. ACTION. Area and District Commanders, Commanders of Maintenance and Logistics commands, Commanding Officers of headquarters units, Assistant Commandants for directorates, Chief Counsel and special staff offices at Headquarters shall ensure that the provisions of this Instruction are followed. Internet release authorized.
3. DIRECTIVES AFFECTED. Asbestos, Lead and Radon in Coast Guard Housing, COMDTINST 6260.1 is cancelled.
4. BACKGROUND. In 1995, the Commandant developed and initiated a strategy to identify and evaluate environmental health risks present in Coast Guard ashore living environments. This included the inspection and risk assessment of Coast Guard living environments to identify the location and condition of asbestos-containing materials, lead and radon. These assessments have come to be known as the statistical baseline *Environmental Risk Assessments* (ERA). This initiative was completed at the end of FY 99. The policy, as set forth in this Instruction, provides a framework for Commanders to successfully implement a hazard management plan by adopting current environmental laws and national consensus standards per references (a) through (l).
5. SCOPE.
 - a. For lead-based paint hazards, the requirements of this instruction apply to Coast Guard controlled housing and CDCs (see Section 7.d. and 7.e.) constructed prior to 1981. For asbestos, radon, lead in water or lead in soil hazards, the requirements apply regardless of the age of the structure.
 - b. Interstate, state, and local requirements for asbestos, lead or radon, which are more stringent than the requirements of this Instruction, shall be given precedence. Such interstate, state and local requirements should be ascertained for each site by checking with the state and local health departments or departments of environmental protection.
 - c. This Instruction redefines and establishes roles and responsibilities for the five (5) program elements: initial risk assessment (baseline) and unit notification; remediation; annual visual re-assessment; occupant disclosure and documentation; and tracking of material condition of environmental health hazards.
6. REQUIREMENTS. Trained personnel have assessed the risks posed by asbestos-containing materials, lead and radon in pre-1981 Coast Guard controlled housing and CDCs. Risks identified at the major or action finding levels have received, and will continue to receive, appropriate corrective actions. Risks identified at or above the monitoring level will continue to receive an annual visual follow-up re-assessment by the Area or Local Housing Officer (AHO or LHO) and report any changes in condition to their Owned Housing Maintenance Coordinator (OHMC) for action. Unit Commanders will implement and track an occupant disclosure system, implement timely control measures, follow-up to verify the effectiveness of controls and track the current status of the risk.

7. DEFINITIONS.

- a. Abate. Elimination of hazard.
- b. Action Level. Those concentrations or physical conditions meeting the requirements, as described in Section 8 of this Instruction, which may pose an increased human health risk. Findings at the action level require initiation of immediate interim control measures or, in the case of asbestos, development of an Operation and Maintenance (O & M) plan, to reduce the risk to the monitoring level or lower.
- c. At Risk Family members. Children under the age of 7 and pregnant women.
- d. Child Development Center (CDC). A facility that offers, on a regularly scheduled basis, developmental services designed to foster social, emotional, physical, creative, and intellectual growth to groups of children. The centers may provide services for drop-in care when space is available. Excluded from the definition are CDCs located within space leased by the United States.
- e. Coast Guard controlled housing. Military family housing and unaccompanied personnel housing (UPH), including barracks, owned by the United States and under Coast Guard administrative control. Excluded from this definition are military family housing and unaccompanied personnel leased housing (UPLH) leased by the United States, and assigned as quarters to members and their families.
- f. Encapsulation. Any covering or coating that acts as a barrier between the hazard (lead-based paint or asbestos) and the environment. The durability of encapsulation in lead-based paint relies on adhesion and the integrity of the existing bonds between multiple layers of paint and between the paint and the substrate. Encapsulation either creates a covering over the surface (bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant). Refer to state guidance when considering using encapsulation as a means of control.
- g. Enclosure. The use of rigid, durable construction materials that are mechanically fastened to the substrate to act as a barrier between the hazard (lead-based paint or asbestos) and the environment. Refer to state guidance when considering enclosure as a means of control.
- h. Environmental Risk Assessments (ERA). For the purposes of this Instruction, ERA is defined as a statistical baseline survey of asbestos-containing materials, lead-based paint and radon in pre-1981 Coast Guard controlled housing or CDCs, conducted in FY96 thru FY99. ERA includes:
 - (1) A comprehensive evaluation of Coast Guard controlled housing or CDCs, following the inspection, sampling and analysis protocols of Section 9 of this

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Instruction, to assess the condition and measure the amount of asbestos-containing materials (ACM), lead (in paint, dust, soil, and water), or radon present;

- (2) A representative sampling using a statistical number of like houses with the same components, and/or painting and maintenance history, as specified in references (a) through (c); or
 - (3) A comparison of the results obtained against the standards of Section 8 of this Instruction to determine the level or degree of risk.
- i. Interim Controls or Operation and Maintenance (O&M). Temporary measures used to reduce major findings and action levels to the monitoring level until permanent corrective action can be taken. Interim controls will not be used for lengths of time greater than specified in references (b) and (c) or by that which is allowed by national consensus standards. Interim controls can include paint film stabilization, enclosure, and encapsulation (in some states). All interim controls for lead will be approved measures as outlined in references (c) and (d). Asbestos O&M plans are described in reference (a). All interim controls and O&M measures are monitored and tracked in the Housing ERA Database (See Section 15.e.3). At a minimum, the interim controls or O&M shall reduce the risk to the monitoring level.
 - j. Major Finding. That concentration or physical condition, as described in Section 8 of this Instruction, which presents a high health risk to occupants and requires immediate corrective action to reduce the hazard to monitoring level and lower, and must be abated within one year of identification.
 - k. Monitoring Level. That concentration or physical condition which at present does not pose a health risk to humans or require immediate corrective action. The AHO, LHO, or OHMC must visually assess Monitoring Level findings annually to ensure conditions have not changed and/or occupants or maintenance workers have not disturbed those surface areas. Results of the annual visual assessment will be annotated by the OHMC in the ERA database at <http://webapps.mlca.uscg.mil/kdiv/kseHousing/login.asp>.
 - l. Operations and maintenance program (O&M). A program of work practices to maintain friable asbestos containing material (ACM) in good condition, ensure clean-up of asbestos fibers previously released, and prevent further release by minimizing and controlling friable ACM disturbance or damage. For further guidance, see reference (a).
 - m. Small Child. A child under the age of seven.

8. ENVIRONMENTAL RISK ASSESSMENT STANDARDS.

Asbestos:

Monitoring Level	Action Level	Major Finding
Asbestos Containing Material (ACM) and Presumed Asbestos Containing Material (PACM), which are intact and have a low potential for disturbance, as in category 7 using ref. (a) hazard assessment guidelines.	ACM or PACM that score fair (damage) or have moderate potential for damage, as in category 5 & 6 using ref. (a) hazard assessment guidelines and airborne asbestos concentrations are less than 0.01 fibers per cubic centimeter (f/cc).	ACM in poor (significantly damaged) condition or has a high potential for significant damage, as in category 1-4 using ref. (a) hazard assessment guidelines or airborne asbestos concentrations are greater than 0.01 f/cc.

Lead In Paint:

Monitoring Level	Action Level	Major Finding
Interior or exterior paint has a lead content greater than or equal to: (a) 1.0 milligram per centimeter square (1.0 mg/cm ²) or (b) 0.5% by weight; and the entire surface is intact when assessed using ref. (d) guidelines.	Interior or exterior paint has a lead content greater than or equal to: (a) 1.0 mg/cm ² or (b) 0.5% by weight; and the paint surface is in fair or poor condition when assessed using ref. (d) guidelines.	Interior or exterior paint has a lead content greater than or equal to: (a) 1.0 mg/cm ² or (b) 0.5% by weight; and the paint surface is in poor condition when assessed using ref. (d) guidelines; and the paint is in an area used by a small child and/or a pregnant woman.

Lead In Dust:

Monitoring Level	Action Level	Major Finding
Normally occupied interior areas found to contain lead dust: Floors (carpeted and uncarpeted): Less than 40 micrograms per square foot (40 ug/ft ²). Interior Window Sills: Less than 250ug/ft ² . Window Troughs: Less than 400 ug/ft ² .	Normally occupied interior areas found to contain lead dust above the monitoring level: Floors (carpeted and uncarpeted): Greater than or equal to 40ug/ft ² . Interior Window Sills: Greater than or equal to 250ug/ft ² . Window Troughs: Greater than or equal to 400 ug/ft ² .	Action Level conditions are met and a small child and/or pregnant woman use the area.

Lead in Soil:

Monitoring Level	Action Level	Major Finding
Bare residential soil around building perimeters and yards: 400 – 1200 ppm. Play areas and high-contact areas for children: 100 - 200 ppm.	Bare residential soil around building perimeters and yards: 1200 – 5000 ppm. Play areas and high contact areas for children: 200 - 400 ppm.	Bare residential soil around building perimeters and yards: Greater than 5000 ppm. Play areas and high contact areas for children: Greater than 400 ppm.

Lead In Water:

Monitoring Level	Action Level	Major Finding
Levels less than 15 micrograms per liter (ug/L) or parts per billion (ppb) do not need to be monitored.	15 - 20 ug/L or ppb.	Greater than 20 ug/L or ppb.

Radon:

Monitoring Level	Action Level	Major Finding
Levels less than 4 picocuries per liter (pCi/L) do not need to be monitored.	4 – 10 pCi/L.	Greater than 10 pCi/L present in interior areas.

9. INSPECTION, SAMPLING AND ANALYSIS PROTOCOLS.

- a. Asbestos. Only inspectors certified in accordance with the requirements of reference (a) shall conduct asbestos inspection and sampling. Laboratories accredited by the National Institute of Standards and Technology’s National Voluntary Laboratory Accreditation Program (NVLAP) shall analyze asbestos samples.
- b. Lead-Based Paint and Lead in Dust. A certified Lead Inspector or Risk Assessor in accordance with references (c) and (d) guidelines shall conduct inspections and sampling. For the analysis of lead samples, only laboratories accredited under EPA National Lead Laboratory Accreditation Programs (NLLAP) will be used. Only a certified Lead Risk Assessor will interpret and make recommendations of sampling results.
- c. Lead in Soil. A certified Lead Inspector or Risk Assessor shall conduct soil sampling for lead in accordance with references (c) and (d). Laboratories accredited by EPA NLLAP shall analyze the samples.
- d. Lead in Water. Drinking water inspection, sampling and analysis for lead shall be conducted in accordance with the requirements of reference (e).
- e. Radon. Sampling and analysis shall be conducted in accordance with the guidelines set forth in references (f) and (g), using EPA recommended testing devices.

10. CORRECTIVE ACTION.

- a. Major level findings present a high health risk to Coast Guard members and their family members. Major findings shall receive immediate interim control measures or O&M. In addition, a corrective action plan shall be instituted to abate the hazard within one year of identification. In cases where interim controls, O&M, or abatement cannot be immediately initiated to adequately protect the Coast Guard members and at risk family

members, the family shall be removed from the high-risk environment. At a minimum, any interim controls or O&M measures shall reduce the risk to the monitoring level.

- b. Action Level findings present a moderate health risk to Coast Guard members and their family members. Action Level findings shall receive interim control or O&M measures that either manage the hazard in place or abate the hazard. At a minimum, the interim control measures or O&M shall reduce the risk to the monitoring level. All action level findings shall be abated within three years of initial identification.
 - c. Monitoring Level findings shall continue to receive visual re-assessment annually.
 - d. A Shore Station Maintenance Record (SSMR) shall be initiated by Group Commanders, Commanding Officers, or Officers-In-Charge for all Major or Action Level findings requiring abatement, which are above the AFC-30 dollar limit as set forth in reference (h). The SSMR shall be developed in accordance with reference (i).
 - e. All asbestos and lead Major or Action Level findings shall be corrected by contractors licensed to perform asbestos and/or lead work and not by Coast Guard personnel. A qualified radon service professional shall correct all radon Major or Action Level findings. No self-help projects that will impact lead-based paint or asbestos-containing materials shall be authorized. Asbestos abatement work is only authorized for those situations or locations discussed in reference (b). Unless prohibited by state law, contracts shall be developed using the philosophy of “manage in place” rather than removal once the hazard has been reduced to a monitoring level.
11. BLOOD LEAD SCREENING, TESTING AND FOLLOW UP. The parents of small children residing in Coast Guard controlled housing or using a CDC, which has a lead hazard condition (Major or Action Level finding), shall be encouraged to have a blood lead-screening test performed on the child. Testing will be arranged and costs will be borne by the Coast Guard. Small children who test at or above the CDC recommended maximum level of 10 micrograms per deciliter (10 ug/dL) shall be re-evaluated using established confirmatory testing for lead. If results of confirmatory testing confirms a blood lead level of 10 ug/dL or higher, and immediate control measures cannot be instituted, the child shall be removed from the identified source of exposure, (see paragraph 15.d. (1)). The MLC detached Safety and Environmental Health Officer (SEHO), following references (c), (d) and (j) guidelines, will initiate an Elevated Blood Lead Level (EBL) investigation. The child shall be reevaluated using established confirmatory testing.
12. RE-ASSESSMENTS.
- a. Annual visual re-assessment is required in all housing where lead or asbestos is known to be present. Re-assessment may be necessary when the AHO, LHO, or OHMC detect a change in the condition from the initial or baseline ERA or when unapproved work has been conducted on a known lead or asbestos surface. MLC (kse) and/or MLC detached

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SEHO will be consulted to determine if the identified change in condition could result in an elevation (or reduction) in the health threat to occupants.

- b. Re-assessments, conducted as part of an abatement project, will be conducted by a third party licensed EPA Lead Risk Assessor, Asbestos Inspector/Management Planner, and/or qualified radon service professional.
- c. MLC (p) and (kse) shall review the Housing ERA database to ensure visual inspections are performed annually by AHOs, LHOs, or OHMCs to determine if there are changes in condition to identified hazards. Identified changes in condition will be brought to the attention of the responsible Civil Engineering Unit (CEU), and as needed, MLC (kse).
- d. For asbestos, each visual re-assessment shall be documented by the OHMC in the O&M plan in accordance with reference (b) and annotated in the Housing ERA database.
- e. MLC (kse) will provide technical guidance and support to AHOs/LHOs where there are changes in material condition that may elevate the health risk of findings. Other support and technical guidance may be offered for elevated blood lead investigations and health education to residents.

13. TRAINING AND ACCREDITATION.

- a. MLC (kse) personnel and Integrated Support Command (ISC) Owned Housing Maintenance Coordinators (OHMC) involved with assessments of asbestos-containing materials and lead-based paint shall successfully complete an EPA accredited asbestos Inspector/Management Planner and lead-based paint Inspector/Risk Assessor course (and/or appropriate State approved training courses), and receive and maintain the corresponding certification.
- b. MLC (p) and ISC OHMC shall successfully complete an EPA accredited asbestos Inspector and lead-based paint Inspector/Risk Assessor course (and/or appropriate State approved training courses), and receive the corresponding certification, and maintain all certifications while in their assigned billets.
- c. All Housing Inspectors shall complete the Coast Guard's Housing Inspector course ERA Lead, Asbestos and Radon (LAR) (PMIS# 501591) Housing Inspector course.
- d. The above training costs will be requested in Commandant's (G-WKS-2) annual AFC-56 training budget request.
- e. All recertification shall be conducted according to schedules in references (a) and (d).

14. DISCLOSURE.

- a. Disclosure of ERA findings (lead, asbestos and radon) to occupants of Coast Guard controlled housing will be in accordance with references (a), (c), (d) and (g). Commanding Officers at all levels, through their AHOs and LHOs, shall provide disclosure letters (reference CG Housing Manual, COMDTINST 11101.13 (series) to current occupants and all future occupants as follows:
 - (1) State the health risks found in their assigned Coast Guard housing: asbestos, lead-based paint, lead in dust, lead in soil, lead in water and/or radon, regardless of levels. Where findings have been completely abated, disclosure letters are not required.
 - (2) Identify the location(s) where asbestos, lead and radon risks were found.
 - (3) Disclose past and future planned abatement efforts; give specific dates of abatement, if known.
 - (4) Identify a point of contact (POC) if lead-based paint or asbestos-containing materials become damaged or if the presence of radon is suspected.
 - (5) Include the appropriate lead pamphlet as an enclosure as outlined in the following website: www.epa.gov/opptintr/lead/leadpdf.pdf
 - (6) Outline the type of activities housing occupants should not participate in (sanding, drilling, etc.).
- b. If the assigned housing unit has not been physically assessed, disclosure letters should state: "Warning, housing built before 1981 may contain lead-base paint and/or asbestos. Based on statistical sampling of other similar housing in your area, lead-based paint or asbestos may be found in (state locations)." Also, state, "Housing built at any time may contain radon. Radon may enter the home through cracks in solid floors, wall, construction joints, gaps in suspended floors, around service pipes, cavities inside walls, and the water supply." Provide the occupants with the appropriate information pamphlets.
- c. All disclosure letters shall be signed and dated by the occupant acknowledging the environmental health risks. The local housing office will retain the original signed disclosure letter on file indefinitely in accordance with the Information and Life Cycle Management Manual, COMDTINST M5212.12 (series).

15. RESPONSIBILITIES.

a. Commandant (G-WPM-4) shall:

- (1) Ensure oversight of the ERA Program in Coast Guard controlled housing.
- (2) Ensure an appropriate number of AHOs, LHOs, OHMCs and their representatives, are trained, accredited and maintain accreditation in accordance with the requirements of this Instruction.

b. Commander, Maintenance and Logistics Commands (kse) shall:

- (1) Ensure an appropriate number of MLC (k) staff members are trained, accredited and maintain accreditation in accordance with the requirements of this Instruction.
- (2) Provide the technical support and guidance regarding re-assessments of previously inspected Coast Guard controlled housing and CDCs, when requested by MLC (s) or (p).
- (3) Work with parents and coordinate with unit or group Health Service technicians to ensure small children living in Coast Guard controlled housing, or attending a CDC which has a lead hazard meeting the conditions of a Major or Action Level finding, are provided the opportunity to participate in blood lead testing and follow-up. As appropriate, initiate and conduct EBL investigations in accordance with references (c) and (j).
- (4) Provide health education when and where appropriate.
- (5) When requested, perform design reviews for Statements of Work (SOW) initiated by CEUs for completeness, protection of Coast Guard members and compliance with applicable Federal, State and local regulations.
- (6) Assist the MLC (p) in reviewing the Housing ERA database to ensure visual inspection records of Coast Guard controlled housing are being maintained by AHO and LHOs and their staff.
- (7) Assist MLC (p) in determining if appropriately trained and accredited MLC/ISC OHMCs should conduct non-destructive sampling of materials containing, or thought to contain lead or asbestos, in order to verify the presence of a hazardous condition. Since training requirements for lead and asbestos may vary from State to State, the appropriate MLC detached SEHO should be consulted for more information.

- c. Commander, Maintenance and Logistics Commands (s), Civil Engineering Units and Commanding Officers shall:
- (1) Ensure that Major finding conditions, which have been identified at Coast Guard controlled housing and CDCs (for which a SSMR has been submitted), are abated on a health hazard priority basis. Ensure funding sources are identified and abatement is completed for Major findings within one year.
 - (2) Ensure that Action Level conditions, which have been identified at Coast Guard controlled housing and CDCs (for which a SSMR has been submitted), are assigned the appropriate priority and funding source for abatement. Ensure Action Level conditions are abated within three years.
 - (3) Ensure all appropriate Federal and State regulations and National consensus standards are properly followed during the disposal of all hazardous waste resulting from abatement.
 - (4) Ensure MLC (kse) is provided updated information regarding any proposed abatement work, completed abatement work, interim controls and any other relevant work being conducted regarding asbestos, lead and radon in Coast Guard controlled housing and CDCs.
 - (5) Ensure any lead and/or asbestos inspection, conducted in connection with a real property disposal action, be carried out in accordance with the requirements of reference (k).
- d. Commander, Maintenance and Logistics Commands (p) shall:
- (2) Coordinate with MLC (kse) and (s) and their cognizant CEUs to ensure that Coast Guard members and “at risk” family members are removed to temporary quarters if Major findings at Coast Guard controlled housing cannot receive immediate corrective action. Coast Guard members with “at risk” family members shall not be assigned to quarters that have Major or Action Level lead findings.
 - (2) With the assistance of MLC (kse) staff, jointly review the Housing ERA database to ensure visual inspections of Coast Guard controlled housing are being performed by AHOs, LHOs, and OHMCs.
- e. Commander, Integrated Support Commands and HQ Unit Area Housing Authorities shall:
- (1) Work with group commanders, unit commanding officers, officers-in-charge, AHOs, LHOs, and OHMCs to ensure that residents of Coast Guard controlled housing and CDC staff are aware of:

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- (a) Potential hazards of lead, asbestos and radon; and
 - (b) Measures they can take, as well as measures being taken by the Coast Guard, to control or abate these hazards.
- (2) Immediately contact the appropriate MLC detached SEHO when there are questions or concerns regarding the presence of radon, or the deterioration of physical condition of the lead and asbestos-containing materials from that described in previous inspection reports. Non-destructive sampling of materials containing or thought to contain lead or asbestos and/or radon testing may be necessary to verify the presence of a hazardous condition. Training requirements for lead and asbestos may vary from State to State. The appropriate MLC detached SEHO should be contacted for State specific information.
 - (3) ISC OHMC shall be responsible to ensure LHOs are visually inspecting Coast Guard controlled housing for the condition of the lead-based paint (LBP) and asbestos containing material (ACM) and proper entries are made in the Housing ERA database.
- f. Local Housing Officers (LHO) shall:
- (1) Complete the Coast Guard's Housing Inspector course, ERA Lead, Asbestos and Radon (LAR) Housing Inspector course (PMIS# 501591).
 - (2) Be responsible for visually inspecting Coast Guard controlled housing for the condition of LBP and ACM to include both suspected LBP and assumed ACM in conjunction with the annual or pre-inspection housing inspections.
 - (3) Immediately contact their AHA/AHO or OHMC with questions or concerns regarding deterioration of LBP and ACM.
 - (4) Obtain a signed disclosure letter, as stated in Section 14 of this Instruction, prior to the initial occupant's acceptance of quarters.
- g. Unit Commanding Officers or Group Commanders shall:
- (1) Determine if their Coast Guard controlled housing or CDC is meeting the scope of this Instruction (see section 5).
 - (2) Initiate immediate response actions for Major and Action Level findings in the form of interim control measures. Coordinate such actions with their AHO, CEU and MLC detached SEHO.

- (3) If needed, initiate SSMRs for Major and Action Level findings as soon as immediate response actions are required.
 - (4) Work with their AHO, CEU, MLC (kse) and MLC detached SEHO to implement long term plans for the management of lead, asbestos and radon hazards.
 - (5) Consult with their CEU to ensure that appropriate and timely corrective measures are implemented to abate any identified hazards.
 - (6) Implement response actions provided to control Major and Action Level findings on a health hazard priority basis. Prioritization within these categories of findings are needed to ensure imminent hazards are eliminated in a timely fashion and recommended follow-up activities, such as blood lead testing of children, is conducted without delay.
 - (7) Ensure that residents of Coast Guard controlled housing and those who utilize CDCs are kept informed of efforts to identify, assess and correct any identified asbestos, lead or radon hazards.
 - (8) Work with their AHO, District Planner, MLC(s) and CEU to ensure that unit housing, identified as meeting Major or Action Level finding conditions, are assigned the proper priority for correction and, where appropriate, are included on the unit's engineering backlog.
16. ENVIRONMENTAL IMPACT CONSIDERATIONS: The development and promulgation of this Instruction has been thoroughly reviewed by the Coast Guard and it has been determined to be categorically excluded from further environmental documentation, in accordance with Categorical Exclusions #1 and #33, Figure 2-1 of the National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts, COMDTINST M16475.1D, as amended by the notice of final agency policy set forth in the Federal Register, Vol. 67, No. 141, pp. 48243-48246 (July 23, 2002).

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17. FORMS/REPORTS: None required.

PAUL J. HIGGINS/s/
Director of Health and Safety