**MAINTENANCE TECHNICAL SUPPORT CENTER / MAINTENANCE POLICIES & PROGRAMS ENGINEERING / UNITED STATES POSTAL SERVICE**

# Maintenance Management Order

**SUBJECT**: Lead Work Practices

**DATE:** September 29, 2009
**NO:** MMO-115-09

**TO:**
1. Maintenance Capable Offices
2. Manager, Maintenance Operations, Area Offices
3. Manager, Safety, Area Offices
4. Manager, Team Leaders, Environmental Compliance
5. Manager, Safety, District Offices
6. Plant Safety Specialists

**FILE CODE:** M, M3
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| Online Change Record | | |
|---|---|---|
| **Change #** | **Date** | **Description of Change** |
| 2 | 12/16/2019 | In Attachment 1, 1st paragraph on page 2, added clarifying information at the end of the paragraph. |
| 1 | 10/26/2009 | The link for Attachment 2, Section 1.2 Object Data has been updated. |

This Maintenance Management Order (MMO) provides lead work practices for use by postal employees who may disturb Lead-Based Paint (LBP), Lead Containing Materials (LCM), or presumed lead containing materials while performing various maintenance tasks. This MMO supersedes MMO-031-94, Lead Exposure in Construction Lead-Based Paint.

The use of any or all of these work practices is voluntary. However, if these work practices are not used (see Attachment 4) the lead work covered by these work practices must be contracted. All decisions to contract must be made in compliance with Article 32 of EL-912, Agreement Between the United States Postal Service and American Postal Workers Union AFL-CIO.

Direct any questions or comments concerning this bulletin to the HelpDesk, Maintenance Technical Support Center, P.O. Box 1600, Norman OK 73070-1600; telephone FTS 2000 (405) 573-2123 or toll free (800) 366-4123.

Robert E. Albert
Manager
Maintenance Technical Support Center
Maintenance Policies and Programs

Attachments:
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4. Lead Work Not Covered by Work Practices
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# ATTACHMENT 1

## BACKGROUND

### 1. OCCUPATIONAL HEALTH AND SAFETY ADMINISTRATION'S GENERAL INDUSTRY STANDARDS

General Industry Standard (29 Code of Federal Regulations 1910.1025)

Under this standard, occupational exposures to lead are regulated for people other than those who work in construction and agricultural operations. A key provision triggering the application of this general industry standard is an employer's initial determination that an employee is overexposed (see 29 CFR 1910.1025(d)(2).)

Maintenance activities covered by the general industry standard are those which involve making or keeping a structure, fixture, or foundation in proper condition in a routine, scheduled, or anticipated fashion such as routine, scheduled cleaning, and repainting that involves minor surface preparation. Wet hand scraping and wet sanding that disrupts 2 square feet or less of a painted surface is an example of minor surface preparation.

Other maintenance tasks not covered by the lead-in-construction standard may still pose a lead hazard, and are covered by the OSHA general industry lead standard. These tasks may include enclosed abrasive blasting, scraping and painting of mail boxes, production lead soldering, and working in firing ranges. These operations must be evaluated for potential lead exposures by postal safety personnel or contractors.

### 2. OSHA CONSTRUCTION STANDARDS

Construction Industry Standard (29 CFR 1926.62)

The OSHA lead-in-construction standard applies whenever construction, repair, renovation (including painting and decoration), or demolition activities are undertaken. Under this standard, occupational exposures to lead in construction activities, such as removing lead-based paint, are regulated.

Lead-related operations may include activities such as demolition of structures, manual scraping and sanding, use of heat guns, and power tool cleaning with dust collection systems. Also addressed are abrasive blasting, welding, cutting, and torch burning. This standard does not apply to routine maintenance, such as routine, scheduled cleaning and repainting that involves minor surface preparation involving 2 square feet or less.

### 3. ENVIRONMENTAL PROTECTION AGENCY (EPA) STANDARDS

Resource Conservation and Recovery Act (RCRA)

Under EPA hazardous waste regulations, a waste must be considered hazardous if it has a concentration of 5.0 milligrams of lead per liter or more when tested by the toxicity characteristic leaching procedure (TCLP) (see 40 CFR 261.24).

Under this regulation, waste material from lead-based paint abatement projects may have to be disposed of as hazardous waste. Examples of such waste include paint chemically stripped from components, spent media from abrasive blasting operations, small painted components, and cleanup debris, e.g., plastic barriers, protective clothing, etc., as well as contaminated soils. Resource Conservation and Recovery Act (RCRA) also regulates waste, including waste metal shavings as scrap metal. Please refer to Environmental Compliance Bulletin – Waste Metal Shavings, July 2018, USPS Office of Sustainability Document No. ECB-WM-01-19-REV02.

## 4. U. S. POSTAL SERVICE'S RESPONSE TO OSHA REGULATIONS

The Postal Service's response to the regulations includes:

- Publishing MI-EL-890-2007-4, Lead Hazard Management Program.
- Developing the work practices, objective data, and publishing this MMO which explains the requirements and procedures to allow Postal Service Maintenance Employees to perform limited lead work.
- Providing training, as required by regulation, to management and craft employees.

## 5. GENERAL INFORMATION

Lead hazards in buildings come primarily from the past use of lead-based paint. Any paint applied before 1978, should be assumed to contain lead unless testing proves otherwise. The mere presence of lead-based paint, however, does not constitute a hazard. The risk of adverse health effects depend on the paint's condition. Manage lead-based paint in Postal Service buildings and on Postal Service property in such a manner that it does not become a hazard to employees or to other building occupants or contaminate the environment.

Maintain paint in place in good condition. Although painted surfaces in good condition are not a health hazard, lead becomes a potential hazard if the paint is allowed to deteriorate; is dry sanded, dry scraped, or heated; or otherwise becomes inhalable. The lead general industry standard requires an initial exposure determination if there is reason to suspect paint in poor condition is creating a potential hazard. A best practice is to maintain paint in place in good condition, such as by top coating. Do not purchase or apply any coatings formulated with lead to Postal Service equipment or property. Removal should only be considered if significant primer and substrate deterioration is present.

Postal Service employees, contractors, and other building occupants must be informed of the presence of LBP if it is anticipated they will perform tasks that may create lead dust or fumes. There are few planned, routine tasks performed by Postal Service employees that may result in exposure to airborne lead above permissible exposure limits (PEL). Reactive or other non-routine maintenance, or construction-related activities, however, may result in the potential to create lead dust or fumes. By managing these activities through lead identification, approved work practices, and engineering controls, managers can prevent employee lead exposures or environmental releases.

Postal Service maintenance employees may perform tasks that do not disturb lead, tasks that have a documented Negative Initial Determination (NID), and any task that is performed using one of the attached work practices.

Some activities, e.g. large paint removal projects, require inspection and testing conducted by qualified contractors who can meet all of the requirements of the OSHA standard. Before


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undertaking minor reactive or other non-routine tasks that may create lead dust, the Lead Competent Person must determine if LBP is present through review of prior samples, inspections, or targeted testing of all layers of paints and coatings that may be disturbed. Testing for small scale activities can be accomplished by rhodizonate (spot) tests (e.g. Lead Alert by Sensidyne or Lead Check by SKC). Consult with local safety specialists and Environmental Professionals to ensure that these requirements are met.

If the presence of lead is detected, the task/operation may not proceed unless all actions are in accordance with the OSHA standard and applicable Environmental Protection Agency (EPA) rules for disposal of hazardous waste.

These regulatory requirements are task-related and include at a minimum: exposure assessments (air monitoring), a written compliance program, respirators and other protective equipment, and training. If exposure assessments warrant, additional requirements must be met, including medical surveillance. MI-EL-890-2007-4, Lead Hazard Management Program addresses these requirements as does the Lead Program Guide. Consult with local safety specialists and Environmental Professionals regarding questions relating to these regulatory requirements. The Lead Program Guide is located on the Safety and Environmental Resource page at:
http://safetytoolkit.usps.gov/Resources/Resources.aspx?filePath=/ResourceFiles/632954764636937457Lead%20Program%20Guide.html

## 6. WORK PRACTICES

The OSHA lead-in-construction standards allow an employer to prove that a work practice cannot produce lead exposures above the Permissible Exposure Limit (PEL) of 50 micrograms per cubic meter of air ($50ug/m^3$), and so, eliminate the need to have onsite air monitoring, respirators, and negative pressure enclosures.

The Postal Service has established proven work practices which include development of specific lead procedures validated by extensive air monitoring to show that employees will not be exposed to lead above the OSHA limits. OSHA refers to this sampling data as “objective data”. Use of these proven work practices allow postal maintenance employees to safely work with lead so they can install equipment, run wiring, and perform other building maintenance activities. The local facility must designate at least one EAS employee, known as a Lead Competent Person, who will review the work practices that are contained in this MMO. The Lead Competent Person reviews building maintenance work, which disturbs LCM and determines which if any of the work practices performed by trained craft employees will result in no lead exposures above the PEL. If none of the work practices apply, the work must be contracted to a licensed lead contractor.


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# ATTACHMENT 2

## WORK PRACTICE ELEMENTS

## 1. HEADQUARTERS PROVIDED ELEMENTS

### 1.1. WORK PRACTICE PROCEDURES

The work practice procedures provided in this MMO were developed and tested by the Northeast Area by contracting with firms which specialize in industrial hygiene work. The work practices were selected by Maintenance Policies and Programs (MPP) based on the most common activities performed by postal employees that may disturb lead. Air sampling was done using the contractor's employees, respirators, and air monitoring.

### 1.2. OBJECTIVE DATA

During the testing phases, extensive air samples were conducted by Certified Industrial Hygienists (CIH). The sample data were analyzed to assure that trained employees using these procedures would not cause an exposure to lead above the OSHA PEL. Further, all work practices were verified to ensure that negligible lead dust was released. The complete report, Negative Initial Determination for Targeted Lead Activities, including sampling data may, be found on the MTSC web site at http://www.mtsc.usps.gov/equipment/safety_external/files/negexpoassessmentsforTLBPWA.pdf

OSHA may want to verify that the objective data does exist during an inspection.

## 2. LOCAL ELEMENTS

### 2.1. LEAD COMPETENT PERSON

Each facility or Facility Maintenance Office which is responsible for buildings with LCM and LBP and has elected to use postal employees to perform work that may disturb lead must designate at least one Lead Competent Person. This designation must be in writing and the original must be kept in the file containing lead information for the building and a copy should be retained in the maintenance office. A Lead Competent Person is one who:

- Has knowledge of the facility.
- Has been specifically delegated in writing as a Lead Competent Person by the facility.
- Has experience and training in work place safety beyond that provided in the lead training program.
- Is capable of identifying existing lead hazards, selecting the appropriate control strategy (i.e. work practice), and has the authority to correct the hazards or stop the work if, in his/her opinion, lead dust will be released in excess of the exposure limits set by OSHA.

The Lead Competent Person is responsible for reviewing building maintenance work which will disturb LCM and LBP. He/she determines and prescribes the appropriate work practices that are to be performed by trained craft employees to assure lead exposures will be below the limits set by OSHA. If there is not a work practice that applies, the work must be contracted to a licensed lead contractor unless a negative initial determination (NID) documented by the Lead

Competent Person in accordance with OSHA regulations is conducted. The NID must be conducted by a Certified Industrial Hygienist under contract to the USPS.

The Lead Competent Person in most facilities will be a Maintenance Supervisor or it may also be the local safety professional. The decision on who will be a Lead Competent Person is left up to the local facility management.

**NOTE**

Other organizations within the Postal Service, such as Districts, Areas, etc., may also have Lead Competent Persons.

There are no specific requirements that the Lead Competent Person be on site at all times. Therefore, it is possible to send a trained maintenance craft employee to a remote site alone and allow them to perform the attached work practices. The Lead Competent Person should review the job and be familiar with the facility prior to the performance of a work practice.



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## 2.2. MAINTENANCE EMPLOYEES AND LEAD COMPETENT PERSON TRAINING

Maintenance Workers

All maintenance employees working with LBP and other LCM must:

1. Receive hazard communication training specific to lead.
2. Be trained in the approved lead work practices so that lead dust or fume is not created.

Annual OSHA lead training is not normally required for Postal Service employees. The OSHA lead-in-construction and general industry standards require annual lead hazard training for the following:

1. Persons exposed to airborne lead in excess of the OSHA action level.
2. Persons performing tasks requiring interim protection (see Attachment 5).

To avoid employee exposures and be cost-effective, postal policy prohibits employees from performing tasks listed in Attachment 5, tasks that cannot be documented with a negative initial determination (NID), or tasks that exceed the OSHA Action Level (AL) as determined by air monitoring.

**Postal employees must receive lead training through the National Center for Employee Development (NCED) before performing any of the lead work practices contained in this MMO. Refer to the automatic enrollment system (AES) for a list of current lead training courses. For additional information, you can contact NCED's EHS team at 405-366-4390.**

Lead Competent Person

Persons designated as the Lead Competent Person in accordance with regulations require training.

The EPA may define training and certification requirements in 40 CFR 745.229 for persons working with LBP in public and commercial buildings in the future. Until EPA issues regulations specific to public buildings, the Postal Service requires the following training elements for the Lead Competent Person:

1. Ability to recognize the potential presence of LBP or other LCM.
2. Knowledge of lead health hazards.
3. Knowledge of prohibited work (see Attachments 4 & 5).
4. Ability to perform an NID.
5. Knowledge of postal-approved lead work practices.
6. Knowledge of maintenance LBP policies and procedures.
7. Knowledge of support resources for LBP management.

**Postal employees who are designated as a Lead Competent Person must receive lead training through the National Center for Employee Development (NCED). Refer to the automatic enrollment system (AES) for a list of current lead training courses. For additional information, you can contact NCED's EHS team at 405-366-4390.**

### 2.3. EQUIPMENT

The equipment to be used in these work practices is listed in each work practice. Some of the work practices list two vacuums. The two vacuums listed were used in the initial development of the work practices. However, sites may use any of the following vacuums to perform the work practices:

- NILFISK® GS 625 / GM 625, Order No. 01798360, GSA Contract No. GS-07F-8356C
- NILFISK® GS 80i / GM 80 Series, Order No. 01790660, GSA Contract No. GS-07F-8356C
- NILFISK Model 135, GSA Contract No. GS-07F-8356C
- Pullman Holt 86ASB-5D4C

These may be used as determined by the Lead Competent Person. No other substitutions are allowed as this would negate the objective data and result in the potential exposure to lead above the PEL. Local sites are responsible for purchasing the equipment, as it will not be procured nationally.

Disposing of lead waste is not considered hazardous waste in all locations. Contact your Lead Competent Person or Environmental Professional to determine the disposal requirements for your facility. If the lead waste does not need to be disposed of as hazardous waste, it is recommended that sites do not use an asbestos designated vacuum to perform the lead work. If a vacuum that is designated for asbestos work is used to perform lead work, the mixed waste must be disposed of as hazardous waste. Vacuums used in performing lead work should be labeled to indicate they contain lead.

The Pullman Holt vacuum is the same model that was previously purchased for use in cleaning mail-processing equipment. If a Pullman Holt vacuum that was used for cleaning equipment is used to perform lead work practices, it must be cleaned, filters and bags replaced, and the vacuum checked to ensure it is functioning properly before it can be used for lead work.


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## 2.4. CHANGING VACUUM FILTER ELEMENTS

High Efficiency Particulate Air (HEPA) filters and bags used to perform lead work will not be changed by postal employees as they could present an exposure to lead above the limits set by OSHA. When the filters or bags need to be changed, contract with a licensed lead abatement contractor to perform the work. Your Environmental Professional or District Safety Manager can provide names of licensed contractors.

## 2.5. NILFISK VACUUM REPAIR INFORMATION

Local sites can use the following process to obtain any necessary repairs for Nilfisk vacuums:

- All repairs would be handled on a case by case basis.
- Each repair request must be called into Nilfisk's customer service at 800-645-3475 or emailed to uspaemailorders@nilfisk-advance.com to receive an RA number, which needs to be placed on the outside of the box for identification.
- All repairs are sent to the Nilfisk facility in Pennsylvania, located at 300 Technology Drive, Malvern, PA 19355.
- All vacuums must be decontaminated prior to shipment for shipping purposes as well as the safety of Nilfisk's technicians.
- Once the technician reviews the vacuum, the technician draws up an estimate and calls the customer for authorization to proceed with the repair. Once the repair is complete, an order is entered into Nilfisk's system and processed for payment.
- You may choose to have the bag and filters replaced at the time of the repair; however, you will incur labor charges that are currently at a rate of $60 per hour. It usually takes about a half hour to change all filters and the bag.


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## 2.6. RECORD KEEPING

Since OSHA will likely determine if an office is in compliance with the standards by examining records, it is imperative that each office maintains, within the maintenance organization, the following information:

- List of the work practices used at the facility. (It is not necessary to train employees for work practices that are not needed or are impractical to use in your facility.)
- List of all Lead Competent Persons and the work practices for which they are responsible.
- List of employees who will use these work practices and the work practices for which they have been trained.
- List of Lead Competent Persons and workers that have received lead training through NCED. The following training information must be locally maintained:

  Name of course
  Dates of the course
  Location of the training
  Work practices covered

- Training must be documented in the national training database (NTD).


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# ATTACHMENT 3

## LIMITATIONS

### 1. CONTRACTOR USE OF WORK PRACTICES

These work practices are to be used only by postal employees performing postal work. The work practices are not to be given to contractors for their use, even on postal premises. (Issues of Postal Service liability could arise in the event of a lead dust release episode if a contractor used a postal work practice.)

### 2. POSTAL WORK ON NON-POSTAL PREMISES

These work practices may be used on non-postal premises occupied by postal employees who are performing Postal Service work. The building owner should be consulted to determine if the work could disturb lead. If the lead may be disturbed or if it is unclear if lead is present, use the appropriate work practice. It will be necessary to provide building owners information on the Postal Service's Lead Competent Person, the workers, and the work practice for their lead records.

### 3. ALTERNATE WORK PRACTICES

Postal employees will not normally use work practices other than those presented in this MMO. If you have funded development of your own work practices and wish to continue using them, contact the MTSC HelpDesk at (405) 573-2123 or toll free (800) 366-4123 and open a safety log requesting a review and approval your work practices. Work practices are not valid and may not be used until reviewed and approved by appropriate headquarters individuals. To facilitate the review and approval process, a printed copy of your work practices and supporting objective data must be sent to the MTSC HelpDesk at Maintenance Technical Support Center, P.O. Box 1600, Norman OK 73070-1600. For tracking purposes, include your contact information and your MTSC HelpDesk log number in the package.

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# ATTACHMENT 4

## LEAD WORK NOT COVERED BY WORK PRACTICES

### 1. GENERAL

If LBP or other LCM is present, Postal Service employees may not perform the following types of tasks:

- Those listed in the lead-in-construction standard as presumed to expose employees to airborne lead levels above the OSHA permissible exposure limit (PEL) and therefore requiring interim protection. Refer to Attachment 5 for the list of tasks.
- Those for which a negative initial determination (NID) cannot be documented by the Lead Competent Person in accordance with OSHA regulations.
- Those where an initial exposure determination indicates that the OSHA PEL for airborne lead is exceeded. .

**NOTE**

If the IED exceeds the OSHA action level of 30 micrograms per cubic meter of air (30 ug/m3), then Postal Service employees must not perform these tasks unless they use the protection required by OSHA, and are monitored.

If work falls into one of the above categories, the lead work must be contracted to a lead contractor as described below.

### 2. BACKGROUND INFORMATION (FOR USPS EMPLOYEES ONLY)

The lead work must be accomplished in accordance with the applicable OSHA Lead Standards, and not expose workers or building occupants to airborne concentrations of lead which exceed the Permissible Exposure Limit (PEL) of 50 micrograms per cubic meter of air ($50ug/m^3$) or create uncontrolled lead dust release episodes which may result in building shutdown. The contractor's Lead Competent Person must determine the appropriate methods for compliance with the OSHA Lead Standards by performance of an initial exposure assessment. The work may require the establishment of “Regulated Areas” with negative pressure enclosures and air sampling.

When the abatement of LBP is required, or other construction or maintenance-related activities make abatement or de-leading necessary, lead abatement as defined in 40 CFR 745.223 must be conducted by persons accredited under the EPA or applicable state regulations. Abatement must be conducted in accordance with 40 CFR 745.227 and with all other applicable federal and state environmental regulations.

Abatement and de-leading operations may result in the generation of a hazardous waste. Facilities and operations that generate hazardous waste are subject to stringent waste management requirements. See MI EL-890-2007-5, Integrated Waste Management, available at http://blue.usps.gov/cpim/mi.htm for additional information on proper hazardous waste management.

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Consult your Environmental Professional or District Safety Manager before contracting for lead work.

## 3. SUGGESTED CONTRACT REQUIREMENTS

If the work potentially disturbs lead, it must be accomplished in accordance with 29 CFR 1926.62, and not expose workers or building occupants to hazardous airborne concentrations of lead. The contractor's Lead Competent Person will determine how the work is to be accomplished. Prior to approval to start work, the contractor will provide to (name of USPS responsible individual):

- The name and telephone number of the Lead Competent Person.
- Documentation to show that the Lead Competent Person and lead workers meet lead training and experience requirements as defined in 29 CFR 1926.62 or as defined by applicable state requirements.
- Brief description of how the work is to be accomplished and how the procedure prevents exposure of workers or building occupants to hazardous airborne concentrations of lead (e.g., uncontrolled release episodes).
- Documentation that the procedures set forth in the EL-800 has been complied with.

The Facilities Department also manages the "Facilities Single Source Provider (FSSP)" program (a.k.a. 'Response Line'), a 24 hour a day, seven day a week phone line for any building-related items to be called in for Facilities support. The realm of calls includes lead matters that can not be handled locally. Facilities Real Estate and Design and Construction staff will work with installation heads, maintenance and local safety, and/or Environmental Professionals to help resolve lead issues at leased or owned facilities. A list of FSSP/Response Line phone numbers is included below.

List of Facilities Service Office (FSO) "Facilities Single Source Provider" (FSSP) Program Response Line Phone Numbers:

- Northeast FSO: (866)298-8910
- New York FSO: (866)331-1144
- Eastern FSO: (866)350-3801
- Southeast FSO: (888)557-3376 aka (888)55SEFSO
- Great Lakes FSO: (866)334-5376 aka (866)33GLFSO
- Western FSO: (866)764-4589
- Southwestern FSO: (866)622-2393
- Pacific FSO: (866)722-3762 aka (866)PACFSO2

The phone numbers listed above are current as of the date this MMO is issued. In the future should a phone number change, you can use the following link to access the Facilities Department web site which provides links to each Facilities Service Office (FSO): http://hqfso.usps.gov/index.cfm?menu508=1&id=4664.

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## ATTACHMENT 5

### OSHA-DEFINED TASKS REQUIRING INTERIM EMPLOYEE PROTECTION

| | Description | Tasks |
|---|---|---|
| **Group 1** | Tasks in this group are presumed to create exposures up to 10 times the PEL where lead-based paint or other lead-containing material is present. | 1. (Dry) manual demolition of structures (e.g. dry wall).<br>2. (Dry) manual scraping.<br>3. (Dry) manual sanding.<br>4. Heat gun applications.<br>5. Power tool cleaning with dust collection systems.<br>6. Spray painting with lead paint. |
| **Group 2** | Tasks in this group are presumed to create exposures 10 to 50 times the PEL where lead-based paint or other lead-containing material is present. | 1. Using lead-containing mortar.<br>2. Lead burning.<br>3. Where lead-containing coatings or paint are present.<br>4. Rivet busting.<br>5. Power tool cleaning without dust collection systems.<br>6. Cleanup activities where dry expendable abrasives are used.<br>7. Abrasive blasting enclosure movement and removal. |
| **Group 3** | Tasks in this group are presumed to create exposures more than 50 times the PEL where lead-based paint or other lead-containing material is present. | 1. Abrasive blasting.<br>2. Welding.<br>3. Cutting.<br>4. Torch burning (gas welder). |

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## ATTACHMENT 6

### DEFINITIONS

Abatement - Any measure or set of measures designed to permanently eliminate lead-based paint hazards (see 40 CFR 745.223).

Action Level - Employee exposure, without regard to the use of respirators, to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 ug/m3) calculated as an 8-hour time-weighted average (TWA).

Lead Competent Person - One who is capable of identifying existing and predictable lead hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures to eliminate them (see 29 CFR 1926.62).

Construction Work - Work for construction, alteration, and/or repair, including painting and decorating. It includes but is not limited to the following:

- Demolition or salvage of structures where lead or material containing lead is present.
- Removal or encapsulation of material containing lead.
- New construction, alteration, repair, or renovation of structures, substrates, or portions thereof that contain material containing lead.
- Installation of products containing lead.
- Lead contamination/emergency cleanup.
- Transportation, disposal, storage, or containment of lead or material containing lead at locations where construction activities are performed, and maintenance operations associated with the construction activities described in this paragraph.

Construction work does not include routine cleaning and repainting, such as minor surface preparation and repainting of offices, where there is insignificant damage, wear, or corrosion of existing lead-containing paint and coatings or substrates.

Hazardous Waste - Waste that can pose a hazard or a potential hazard to human health or the environment when managed improperly. RCRA regulations characterize a waste as hazardous if it possesses a hazardous waste characteristic (ignitability, corrosivity, reactivity, or toxicity) or if EPA specifically lists it as a hazardous waste. LBP and debris containing LBP could be considered hazardous.

Initial Exposure Determination - The process of monitoring of employee lead exposures, using any information, observations, or calculations that indicate employee exposure to lead; any previous measurements of airborne lead; or any employee complaints. Previous measurements made within 12 months may be used if applicable. Previous results demonstrating that a particular product or activity cannot result in employee exposure above the action level can be used.

Inspection - A surface-by-surface investigation of the building interior and exterior to determine the presence of LBP, and report that describes the findings of that investigation. An inspection applies to all or a significant portion of a building. Inspections must be conducted in accordance with 40 CFR 745.

Lead - Metallic lead, all inorganic lead compounds, and organic lead soaps (the lead salt of an organic acid, the latter usually being a fatty acid). Excluded from this definition are all other organic lead compounds.

Lead-based paint (LBP) - Paint or other surface coatings (such as varnishes and lacquers for example on wood floors) that contain lead. 40 CFR 745 further defines LBP as paint that contains lead equal to or in excess of 1.0 milligrams per square centimeter, or more than 0.5 percent by weight. OSHA has no minimum amount or concentration of lead that triggers a determination that lead is present. Individual states may also have published LBP definitions that may be applicable.

Lead-containing material (LCM) - Any material that contains lead, such as solder, lead-contaminated dust or soil, spent bullets, and lead weights.

Negative Initial Determination (NID) - A documented (in writing) determination by a Lead Competent Person that no employees are exposed to lead at or above the action level. The determination is made using the methods prescribed in the standard, including the use of objective data.

Permissible Exposure Limit (PEL) - Lead at concentrations greater than 50 micrograms per cubic meter of air (50 ug/m3) averaged over an 8-hour period (TWA). The employer shall assure that no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 ug/m3) averaged over an 8-hour period.

Targeted Lead Test (TLT) - A test of all layers of paints and coatings that may be disturbed for the presence of LBP or other LCM before performing a specific task, such as spot welding a guard rail. Paint chip analysis or other OSHA-approved test methods must be used.

Time-Weighted Average (TWA) - A formula used to compute the cumulative lead exposure for an 8-hour work shift.



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# ATTACHMENT 7

## RESOURCES

### 1. POSTAL SERVICE

- Handbook RE-6, *Facilities Environmental Guide*, available at http://blue.usps.gov/cpim/hbkid.htm.
- Lead Hazard Management Program Guide, Safety and Environmental Resource Website, available at http://safetytoolkit.usps.gov/resources/resources.aspx.
- Lead Hazard Management Program Management Instruction, EL-890-2007-4 available at http://blue.usps.gov/cpim/ftp/manage/e8900074.pdf.

### 2. OTHER

- Department of Housing and Urban Development, Guidelines for the Evaluation and Control of Lead-Based Paint in Housing, 1990 located at http://www.hud.gov/offices/lead/leadreferencelibrary.cfm.
- The National Institute of Building Sciences, Lead-Based Paint: Operations & Maintenance Work Practices Manual for Homes and Buildings located at http://www.nibs.org/.
- OSHA Lead Standards located at http://www.osha.gov/SLTC/lead/index.html.

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# ATTACHMENT 8

## LBP26 – NEEDLE GUN REMOVAL OF LBP FROM STEEL

### 1. APPLICATION

This Work Practice applies to removal of LBP from steel doors, mail boxes, or other metal surfaces using a NILFISK-ADVANCE® dustless needle gun attached to the NILFISK-ADVANCE® GS 625 or GS 80i HEPA vacuum.

### 2. NOTES

All maintenance activities that may disturb lead-based paint must be authorized by the Lead Competent Person prior to beginning the work activity.

**This work practice cannot be conducted within small, enclosed areas (less than 150 square feet) or for more than four hours per day.**

**All employees who will be engaged in this Work Practice must have received lead training, including training on this work practice.**

**As an authorized maintenance activity, this Work Practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot use this work practice.**

**Observe all local safety procedures and use any and all Personal Protective Equipment (PPE) required by the Lead Competent Person and your supervisor. Use of a respirator is not required for USPS personnel if the Work Practice is conducted following the steps listed below.**


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## 3. TOOLS AND EQUIPMENT FOR THIS WORK PRACTICE

The equipment required for this Work Practice includes standard equipment required for most Work Practices and also specialized equipment as described below:

### 3.1. STANDARD EQUIPMENT

Standard equipment includes Safety cones[1], barricade tape[2], 6 mil clear disposal bag[5], wet wipes (baby wipes), fire retardant poly sheeting[3], disposable towels or rags[1], duct tape[1], temporary work lights[1], amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water[1].

### 3.2. SPECIALIZED EQUIPMENT

NILFISK-ADVANCE® GS 80i (Part No. 01790601) or GS 625 (Part No. 01798300) dust collector (vacuum) with 12-inch wheeled floor nozzle (Part No. 82366900) and 6" crevice nozzle (Part No. 81140900)[4]; and NILFISK-ADVANCE dustless needle gun kit: Pistol Grip Needle Gun System (Part No. 01780010) or
Micro needle gun with Dust Shroud (Part No. 01780960), anti-static hose -38 mm (Part No. 01716200), and hose adapter kit [for Hand tool Hose kit for Antistatic Hose (38mm twist) (Part No. 01716720) or for Antistatic cuff (two required for each hose length) (2) (Part No. 01716300)].

## 4. PRE-WORK ACTIVITIES CHECKLIST

1. Authorization to perform the work has been obtained from the Lead Competent Person.
2. All employees engaged in the Work Practice have lead training, including training on this work practice.
3. Confirm that all workers involved in the Work Practice have the appropriate PPE.

**NOTE**

If bystanders may be affected by noise levels, contact the Lead Competent Person or supervisor for directions on proceeding with the work.

4. Assemble all required tools and equipment, including standard and specialized equipment listed above.
5. Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

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[1] Standard materials or equipment that can be obtained at local hardware stores.
[2] The barricade tape shall have the words "Warning - Restricted Area" repeatedly printed along its length. The barricade tape can be obtained from Grainger at Grainger.com, Part No. 1N912.
[3] Can be obtained from ARAMSCO, 1-800-767-6933, Part No. 56163 (4 mil) or Part No. 56060 (6 mil).
[4] GSA Contract No. GS-07F-8356C.
[5] Can be obtained from ARAMSCO, 1-800-767-6933, Part No 56173 (38”x60” bag) or Part No. 56206 (30”x40” bag).

6. Turn on the vacuum and check for normal operating conditions:
   a. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
   b. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
   c. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
   d. Listen to the motor. If the motor is running fast or sounds high-pitched, the bag may be full or the filter clogged.
7. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the Lead Competent Person or your supervisor to have the vacuum bag and/or filter replaced by an authorized contractor.

**NOTE**

For the GS 625 vacuum unit, bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

## 5. WORK AREA PREPARATION CHECKLIST

1. Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the Work Practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape.
2. HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

## 6. CONDUCTING THE WORK PRACTICE

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Move moveable objects from the work area and cover the floor and immovable objects in the work area with poly sheeting. Make sure that the poly sheeting extends at least 6 feet in every direction from the limits of where the paint will be removed. Place the tools, equipment, and materials needed into the work area.
3. Score the paint around the area where LBP will be removed with a utility knife.
4. Remove all loose paint from the surface by HEPA vacuuming the surface.
5. Assemble Equipment:
   a. Connect the air hose to the needle gun.
   b. Connect the connector hose to the NILFISK-ADVANCE® needle gun shroud tube and the vacuum hose.


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6. Prepare to remove paint from the surface:
   a. Turn on the vacuum.
   b. Position the NILFISK-ADVANCE® needle gun on the area of paint to be removed.
7. Turn on the NILFISK-ADVANCE® needle gun and remove the paint.
8. After paint removal is complete, detach the connector hose from NILFISK-ADVANCE® needle gun. Detach the other end of the connector hose from the vacuum hose. Seal the connector hose with duct tape. Turn off the vacuum and seal the vacuum hose end or connect the appropriate attachment to vacuum the work area.



## 7. CLEAN-UP AND TEAR DOWN PROCEDURES

1. HEPA vacuum the work area, tools, and equipment used during the work practice. Wet wipe the work area, the tools, and the equipment. Also vacuum and wet wipe the soles of shoes to avoid tracking of paint debris from the work area. Used wet wipes can be sucked into the vacuum or placed into a 6 mil clear disposal bag. Return the tools and equipment to their storage location(s).

**NOTE**

Prior to handling debris and waste material, make sure they are wetted with amended water.

2. Place all debris and waste materials into a 6 mil clear disposal bag.
3. Seal the 6 mil clear disposal bag. Contact your Lead Competent Person or Environmental Professional and perform any additional containerization, labeling, storage, manifesting, transport, and disposal of the bagged lead-based paint waste in accordance with his/her instructions.
4. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for reoccupancy and access barriers are removed.

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# ATTACHMENT 9

## LBP27 - DRILLING HOLES THROUGH LEAD-BASED PAINT ON WALLS

### 1. APPLICATION

This Work Practice applies to drilling holes through lead-based paint on gypsum board, plaster walls, wood, or concrete using the NILFISK-ADVANCE® GS 80i or Postal Service GS 625 dustless drilling system to attach hooks, picture hangers, screws, and/or other hardware.

**NOTE**

A hole can be drilled through a wall with this work practice if the wall where the bit will exit is painted with lead-based paint, only if precautions in this practice are followed. Whenever possible align and drill holes using this practice from both sides of the wall.

### 2. NOTES

All activities that may disturb lead-based paint must be authorized by the Lead Competent Person prior to beginning the work activity.

**All employees who will be engaged in this Work Practice must have received lead training, including training on this work practice.**

**As an authorized maintenance activity, this Work Practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot use this work practice.**

**Observe all local safety procedures and use any and all PPE required by the Lead Competent Person and your supervisor. Use of a respirator is not required for USPS personnel if the Work Practice is conducted following the steps listed below.**

**For safety, this Work Practice requires a stable working surface.**

**Prior to drilling, verify that you will not penetrate electrical lines, water lines, or other utilities.**



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## 3. TOOLS AND EQUIPMENT FOR THIS WORK PRACTICE

The equipment required for this Work Practice includes standard equipment required for most Work Practices and also specialized equipment as described below:

### 3.1. STANDARD EQUIPMENT:

Standard equipment includes: Safety cones[1], barricade tape[2], 6 mil clear disposal bag[3], wet wipes (baby wipes), disposable towels or rags[1], duct tape[1], temporary work lights[1], amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water[1], shaving cream for exit holes if needed.

### 3.2. SPECIALIZED EQUIPMENT

Specialized equipment includes: NllFISK of America, Inc., Postal Service GS 625 dustless drilling system[4], Order No. 017983604 or Postal Service GM 80i dustless drilling system[5], Order No. 01790660[6]; appropriate diameter and length drill bit with appropriate length drill shroud; and regular nylon snap bushings from Serve-A-Lite, Moline, IL, Part No. NSB-18-254 (call 1-800-447-6760 for local availability).

## 4. PRE-WORK ACTIVITIES CHECKLIST

1. Authorization to perform the work has been obtained from the Lead Competent Person.
2. All employees engaged in the Work Practice have lead training, including training on this work practice.
3. Confirm that all workers involved in the Work Practice have the appropriate PPE.
4. Assemble all required tools and equipment, including standard and specialized equipment listed above.
5. Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

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[1] Standard materials or equipment that can be obtained at local hardware stores.
[2] The barricade tape shall have the words "Warning - Restricted Area" repeatedly printed along its length. The barricade tape can be obtained from Grainger at Grainger.com, Part No. 1N912.
[3] Can be obtained from ARAMSCO, 1-800-767-6933, Part No 56173 (38”x60” bag) or Part No. 56206 (30”x40” bag).
[4] A standard hand drill approved for use with the NILFISK-ADVANCE small drill system should be used. The NILFISK-ADVANCE hammer drill cannot be used under this work practice.
[5] GSA Contract No. GS-07F-8356C.
[6] If the facility already has the GS 625 vacuum but does not have the NILFISK-ADVANCE® small drill system, order only the small drill with accessories (Drill System–VSR), Order No. 01743050 and use it with the GS 625 vacuum.


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6. Turn on the vacuum and check for normal operating conditions:
   a. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
   b. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
   c. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
   d. Listen to the motor. If the motor is running fast or sounds high-pitched, the bag may be full or the filter clogged.
7. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the Lead Competent Person or your supervisor to have the vacuum bag and/or filter replaced by an authorized contractor.

**NOTE**

For the GS 625 vacuum unit, bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

## 5. WORK AREA PREPARATION CHECKLIST

1. Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the Work Practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape. If it is not feasible to drill holes from both sides of a wall also place a barrier around the planned exit hole.
2. HEPA vacuum the work area (and exit hole area if necessary). Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

## 6. CONDUCTING THE WORK PRACTICE

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Place the tools, equipment, and materials needed into the work area.
3. Assemble Equipment:
   a. Connect the hose to the HEPA vacuum.
   b. To prevent hand injury, do not connect the drill to an electrical power source until the drill is assembled.
   c. Insert the drill neck into the drill shroud[6] collar.
   d. Attach the drill shroud[7] to the drill.

[7] A drill shroud that is the correct length to cover the bit length should be obtained from the manufacturer. The shroud when attached to the particular drill should extend beyond the end of the drill bit, but not so far as to make operation under step 5d difficult.


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e. Adjust the depth gauge, if used.

f. Insert a bit through the matching (appropriate length) shroud[6] and into the chuck.

g. Connect the vacuum hose to the drill shroud tube.

4. Mark the holes to be drilled, and corresponding exit points if necessary. Do not position holes closer than 2" to the nearest wall or other immovable object. If the shroud is obstructed by such items, it cannot function in the way required by this Work Practice.

5. Prepare to drill the holes:

   a. Wet the location to be drilled by spraying with amended water.

   b. If drilling completely through the wall, apply shaving cream to the exit hole location and place disposable towel on the floor below the hole.

   c. Turn on the vacuum.

   d. Pull back the shroud to center the bit on the mark. Release the shroud such that the full circumference of the shroud is in contact with the wall. **Do not try to drill at an oblique angle to the wall or the shroud may not be able to function as required by this work practice.**

6. Drill the hole. Do not use excessive force. Allow the machine to do the work.

7. Clean the drill insertion point with a wet rag or towelette.

   a. Unload pressure on the drill.

   b. After the flutes of the bit pull loose material from the hole, withdraw the bit and stop the drill.

   c. While maintaining hold of the drill, grasp the shroud.

   d. Slowly separate the shroud seal from the wall surface and vacuum the area that was drilled.

   e. While the vacuum is running, stretch the drill shroud out and hold it upright to dislodge into the vacuum any debris that might have accumulated inside the shroud.

   f. Go to the exit hole location and wipe the shaving cream area with a clean disposable towel. Pick up the towel on the floor and dispose of both in a 6 mil clear disposal bag.

8. If there are more holes ready to drill, prepare to drill the next hole (steps 5 through 7).

9. If there are no more holes to drill, dismantle the shroud and wipe off the bit and shroud with a disposable, moistened towelette. Detach from the drill the connector hose that connects the drill to the standard vacuum hose. Detach the other end of the connector hose from the vacuum hose. Seal the connector hose with duct tape. Dispose of the towelette by sucking it into the HEPA vacuum or by placing it into a 6 mil clear disposal bag. Turn off the vacuum and seal the vacuum hose end or connect the appropriate attachment to vacuum the work area.



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## 7. CLEAN-UP AND TEAR DOWN PROCEDURES:

1. HEPA vacuum the work area, tools, and equipment used during the work practice. Wet wipe the work area, the tools, and the equipment. Used wet wipes can be sucked into the vacuum or placed into a 6 mil clear disposal bag. Return the tools and equipment to their storage location(s).

**NOTE**

Prior to handling debris and waste material, make sure they are wetted with amended water.

2. Place all debris and waste materials into a 6 mil clear disposal bag.
3. Seal the 6 mil clear disposal bag. Contact your Lead Competent Person or Environmental Professional and perform any additional containerization, labeling, storage, manifesting, transport, and disposal of the bagged lead-based paint waste in accordance with his/her instructions.
4. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for reoccupancy and access barriers are removed.

## 8. DRILLING A HOLE DEEPER THAN THE NILFISK-ADVANCE® DUSTLESS DRILLING SYSTEM IS DESIGNED TO DRILL

If you need to drill a hole deeper than the NILFISK-ADVANCE® dustless drilling system is designed to drill, you can use the NILFISK-ADVANCE® system to start the hole and then finish with another drill that can drill the hole as deep as you need. **This activity can only be conducted if lead-based paint is limited to the surface of the wall to be drilled.**

1. Start by drilling a hole twice as wide as required with the NILFISK-ADVANCE® dustless drilling system.
2. Stop drilling with the NILFISK-ADVANCE® dustless drilling system after you have completely penetrated the lead-based paint (one- inch is usually sufficient).
3. Remove the drill bit as described in Section 6, step 9 on page 4 of this attachment.
4. Insert a plastic conduit bushing that fits the hole. Make sure that the conduit bushing completely covers the edge of the lead-based paint. Don't hammer the bushing when installing.
5. Using another drill with a longer bit, drill a hole of the required diameter through the center of the conduit bushing and into the wall. When drilling, stay in the center of the hole to avoid damaging the bushing.
6. Attach the hardware to the wall through the center of the conduit bushing. If necessary, remove the bushing prior to installing the hardware.

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# ATTACHMENT 10

## LBP28 - WET SANDING LEAD-BASED PAINT FROM METAL, PLASTER, GYPSUM, OR WOOD

### 1. APPLICATION

This Work Practice applies to wet sanding of lead-based paint from metal, plaster, gypsum, or wood surfaces using hand-held sand paper or sanding block.

**NOTE**

Wet sanding above the worker's head is prohibited.

### 2. NOTES

All maintenance activities that may disturb lead-based paint must be authorized by the Lead Competent Person prior to beginning the work activity.

**All employees who will be engaged in this Work Practice must have received lead training, including training on this work practice.**

**As an authorized maintenance activity, this Work Practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot use this work practice.**

**For safety, this Work Practice requires a stable working surface.**

**Ensure that the Work Practice can be conducted safely at an elevation. Only non-conductive (e.g., wood or fiberglass) ladders or other staging equipment of the correct load rating can be used. If you must work at an elevation of greater than 4 feet, you are required to comply with OSHA standards for working at elevation, including required training, OSHA standards require the use of body harnesses, lifelines, toe boards, railings, and other safety devices, as appropriate.**

**Observe all local safety procedures and use any and all PPE required by the Lead Competent Person and your supervisor. Use of a respirator is not required for USPS personnel if the Work Practice is conducted following the steps listed below.**


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## 3. TOOLS AND EQUIPMENT FOR THIS WORK PRACTICE:

The equipment required for this Work Practice includes standard equipment required for most Work Practices and also specialized equipment as described below:

### 3.1. STANDARD EQUIPMENT:

Standard equipment includes: Safety cones[1], barricade tape[2], 6 mil clear disposal bag[3], wet wipes (baby wipes), 4-mil or 6 mil poly sheeting[1], disposable towels or rags[1], duct tape[1], temporary work lights[1] (when required), amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water[1], ground fault circuit interrupter (GFCI), ANSI approved ladder (when required), ANSI approved stable platform or staging (when required), disposable vinyl or nitrile gloves[1], work gloves[1].

### 3.2. SPECIALIZED EQUIPMENT

Specialized equipment includes: Sanding Medium[4], NILFISK-ADVANCE GS80i HEPA Vacuum[5].

## 4. PRE-WORK ACTIVITIES CHECKLIST

1. Authorization to perform the work has been obtained from the Lead Competent Person. A safety talk on this Work Practice has been provided to USPS employees in the immediate vicinity of the work.
2. All employees engaged in the Work Practice have lead training, including training on this work practice.
3. All workers involved in the Work Practice have the appropriate PPE.
4. All required tools and equipment have been assembled, including standard equipment listed above.

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[1] Standard materials or equipment that can be obtained at local hardware stores.
[2] The barricade tape shall have the words "WARNING - RESTRICTED AREA" repeatedly printed along its length. The tape can be obtained from Grainger at Grainger.com Part Number 1N912.
[3] Can be obtained from ARAMSCO, 1-800-767-6933, Part No 56173 (38”x60” bag) or Part No. 56206 (30”x40” bag).
[4] Waterproof sanding paper, sanding sponge, or emery cloth made for wet sanding. Only use sandpaper grits between 60 and 220.
[5] Vacuum and accessories -NILFISK-ADVANCE GS 80i (Part No. 01790601) or GS 625 (Part No. 01798300) dust collector (vacuum) with 12" wheeled floor nozzle (Part No.1 1 1422) and 6" crevice nozzle (Part No. 81140900). Vacuum and accessories can be ordered under GSA Contract No. GS-07F-8356C.

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## 5. WORK AREA PREPARATION CHECKLIST

1. Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the Work Practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape.
2. All electrical devices must be connected to a GFCI.
3. Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.
4. Turn on the vacuum and check for normal operating conditions:
   a. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
   b. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
   c. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
   d. Listen to the motor. If the motor is running fast or sounds high-pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the Lead Competent Person or your supervisor to have the vacuum bag and/or filter replaced by an authorized contractor.

**NOTE**

For the GS 625 vacuum unit, bag, or filter, replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

6. HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

## 6. CONDUCTING THE WORK PRACTICE

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Move moveable objects from the work area and cover the floor and immovable objects in the work area with poly sheeting. Make sure that the poly sheeting extends at least 6 feet in every direction from the limits of where the paint will be removed.
3. Place the tools, equipment, and materials needed into the work area.
4. All required tools and equipment have been assembled, e.g. vacuum hoses are in place.
5. Don the work gloves over the nitrile or vinyl gloves. Use safety glasses.
6. HEPA vacuum the painted surface where the paint will be sanded off to remove any loose or scaling paint.

7. The surface of the area to be sanded should be kept moist by lightly spraying with amended water. Avoid excessive spraying and dripping. Avoid accumulation of standing water on horizontal surfaces. If standing water is observed, clean up with disposable rags. Place used rags in a 6 mil clear disposal bag.
8. Begin sanding the paint off of the surface.
9. Ensure settled dust is kept wet until final clean-up by intermittently spraying dust with amended water. During the performance of this Work Practice, care should be taken to ensure that a slipping hazard does not exist.
10. Continue sanding until you have removed the paint from the desired surface area.

**7. CLEAN-UP AND TEAR DOWN PROCEDURES**

1. Prior to handling debris and waste material, make sure they are wetted with amended water.
2. HEPA vacuum the work area, poly sheeting, tools, and equipment used during the Work Practice. Wet wipe the work area, poly sheeting, tools and equipment used during the Work Practice. Return the tools and equipment to their storage location(s). HEPA vacuum and wet wipe the soles of the worker's feet to ensure no debris is transported out of the work area.
3. Place all debris, waste materials, and used cleaning materials and wipes into a 6 mil clear disposal bag. If waste material is minimal, used wet wipes can be sucked into the vacuum or placed into the 6 mil clear disposal bag.
4. Place cleaned tools and equipment outside the work area.
5. Wet-wipe the exterior of the 6 mil clear disposal bag. Remove the cleaned disposal bag from the work area.
6. Fold poly sheeting from the edges to the center to cover top of sheeting. Place poly sheeting in the 6 mil clear disposal bag.
7. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination and re-clean as necessary before the area is cleared for reoccupancy and access barriers are removed.
8. Remove gloves. Place the nitrile or vinyl disposable gloves in the 6 mil clear disposal bag.
9. Seal the 6 mil clear disposal bag. Contact your Lead Competent Person or Environmental Professional and perform any additional containerization, labeling, storage, manifesting, transport, and disposal of the bagged lead-based paint waste in accordance with his/her instructions.
10. Wash hands and face with soap and water upon leaving work area.


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# ATTACHMENT 11

## LBP30 - DUSTLESS DRILLING THROUGH LEAD-BASED PAINT ON FLAT, IRREGULAR, AND OVERHEAD SURFACES, INCLUDING METAL

### 1. APPLICATION

This Work Practice applies drilling holes through lead-based paint on flat, irregular or overhead surfaces including metal, using a dustless drill system with shroud and HEPA vacuum attachment.

**NOTE**

If the wall or floor where the bit will exit is painted with lead-based paint, attempt to measure the thickness of the surface and drill halfway in from both sides, in accordance with this Work Practice. A hole can be drilled through a wall with this work practice if the wall where the bit will exit is painted with lead-based paint only if precautions in this practice are followed. Whenever possible align and drill holes using this practice from both sides of the wall.

### 1.1. NOTES

All maintenance activities that may disturb lead-based paint must be authorized by the Lead Competent Person prior to beginning the work activity.

**All employees who will be engaged in this Work Practice must have received lead training, including training on this work practice.**

**As an authorized maintenance activity, this Work Practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot use this work practice.**

**For safety, this Work Practice requires a stable working surface.**

**Ensure that the Work Practice can be conducted safely at an elevation. Only non-conductive (e.g., wood or fiberglass) ladders or other staging equipment of the correct load rating can be used. If you must work at an elevation of greater than 4 feet, you are required to comply with OSHA standards for working at elevation, including required training, OSHA standards require the use of body harnesses, lifelines, toe boards, railings, and other safety devices, as appropriate.**

**Prior to drilling, verify that you will not penetrate electrical lines, water lines, or other utilities.**

**Observe all local safety procedures and use any and all PPE required by the Lead Competent Person and your supervisor. Use of a respirator is not required for USPS personnel if the Work Practice is conducted following the steps listed below.**

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## 2. TOOLS AND EQUIPMENT FOR THIS WORK PRACTICE:

The equipment required for this Work Practice includes standard equipment required for most Work Practices and also specialized equipment as described below:

### 2.1. STANDARD EQUIPMENT

Standard equipment includes: Safety cones[1], barricade tape[2], 6 mil clear disposal bag[3], wet wipes (baby wipes), 4-mil or 6 mil poly sheeting[1], disposable towels or rags[1], duct tape[1], temporary work lights[1] (when required), amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water[1], ground fault circuit interrupter (GFCI), ANSI approved ladder (when required), ANSI approved stable platform or staging (when required), disposable vinyl or nitrile gloves[1], work gloves[1].

### 2.2. SPECIALIZED EQUIPMENT

Specialized equipment includes: Dustless drilling system - NILFISK-ADVANCE of America, Inc. Postal Service GM 80i dustless drilling system, Part No. 01790660[4]; pistol-grip drill approved for use with the system by NILFISK-ADVANCE of America, Inc.; and an appropriate diameter drill bit of length to match the shroud to be used (usually 6-inch)[4], Nylon snap bushings[5].

## 3. PRE-WORK ACTIVITIES CHECKLIST

1. Authorization to perform the work has been obtained from the Lead Competent Person. A safety talk on this Work Practice has been provided to USPS employees in the immediate vicinity of the work.
2. All employees engaged in the Work Practice have lead training, including training on this work practice.
3. All workers involved in the Work Practice have the appropriate PPE.
4. All required tools and equipment have been assembled, including standard equipment listed above.
5. Check the location where the drill bit will exit to determine if it is lead based paint. If it is not a lead containing material, ensure that a bystander will not be injured by the exiting drill bit.

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[1] Standard materials or equipment that can be obtained at local hardware stores.

[2] The barricade tape shall have the words "WARNING - RESTRICTED AREA" repeatedly printed along its length. The tape can be obtained from Grainger at Grainger.com Part Number 1N912.

[3] Can be obtained from ARAMSCO, 1-800-767-6933, Part No 56173 (38”x60” bag) or Part No. 56206 (30”x40” bag).

[4] If the facility already has the GS 625 vacuum but does not have the NILFISK-ADVANCE small drill system, order only the small drill with accessories (Drill System-VSR), Order No, 01743050, and use it with the GS 625 vacuum. Vacuum and accessories can be ordered under GSA Contract No. GS-07F-8356C.

[5] Regular nylon snap bushings from Serve-A-Lite, Milone, IL, Part No. NSB-18-254 (Call 1-800-447-6760 for local availability.)

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## 4. WORK AREA PREPARATION CHECKLIST

1. Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the Work Practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape.
2. Connect all electrical devices to a GFCI.
3. Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.
4. Turn on the vacuum and check for normal operating conditions:
   a. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
   b. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
   c. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
   d. Listen to the motor. If the motor is running fast or sounds high-pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone contact the Lead Competent Person or your supervisor to have the vacuum bag and/or filter replaced by an authorized contractor.

**NOTE**

For the GS 625 vacuum unit, bag, or filter, replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

6. HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

## 5. CONDUCTING THE WORK PRACTICE

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Move moveable objects from the work area and cover the floor and immovable objects in the work area with poly sheeting. Make sure that the poly sheeting extends at least 6 feet in every direction from the limits of where the paint will be removed.
3. Place the tools, equipment, and materials needed into the work area.

4. Assemble Equipment:
   a. Connect the hose to the HEPA vacuum.
   b. Do not connect the drill to an electrical power source until the drill is assembled.
   c. Insert the drill neck into the drill shroud[6] collar.
   d. Attach the drill shroud to the drill.
   e. Adjust the depth gauge, if used.
   f. Insert a bit through the matching (appropriate length) shroud and into the chuck.
   g. Connect the vacuum hose to the drill shroud tube.
5. Mark the holes to be drilled. **Do not position holes closer than 2" to the nearest wall or other immovable object. If the shroud is obstructed by such items, it cannot function in the way required by this Work Practice**.
6. If the hole to be drilled will penetrate the wall, a debris collection device can be used on the opposite side wall to collect the non-lead-based paint debris disturbed when the bit exits the wall. Poly sheeting on the floor or a plastic sheet loosely taped over the exit location are both acceptable solutions. If drilling completely through the wall and the exit also has lead based paint apply shaving cream to the exit hole location and place disposable towel on the floor below the hole.
7. Don the work gloves over the vinyl or nitrile gloves. Use hearing protection and safety glasses.
8. Prepare to drill the holes:
   a. Turn on the vacuum.
   b. Pull back the shroud to center the bit on the mark. Release the shroud such that the full circumference of the shroud is in contact with the wall. **Do not try to drill at an oblique angle to the wall or the shroud may not be able to function as required by this Work Practice.**
9. Drill the hole. Do not use excessive force. Allow the machine to do the work.
10. Upon completion of the hole:
    a. Unload pressure on the drill.
    b. After the flutes of the bit pull loose material from the hole, withdraw the bit and stop the drill.
    c. While maintaining hold of the drill, grasp the shroud.
    d. Slowly separate the shroud seal from the wall surface and vacuum the area that was drilled.
    e. While the vacuum is running, stretch the drill shroud out and hold it upright to dislodge into the vacuum any debris that might have accumulated inside the shroud.

[6] A drill shroud that is the correct length to cover the bit length should be obtained from the manufacturer. The shroud when attached to the particular drill should extend beyond the end of the drill bit but not so far as to make operation under step 10e difficult.


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11. Clean the drill insertion point with a wet rag or towelette. Go to the exit hole location and wipe the shaving cream area with a clean disposable towel. Pick up the towel on the floor and dispose of both in a 6 mil clear disposal bag.
12. If there are more holes ready to drill, prepare to drill the next hole (follow steps 5 through 10).

If there are no more holes to drill, dismantle the shroud and wipe off the bit and shroud with a disposable, moistened towelette. Detach from the drill the connector hose that connects the drill to the standard vacuum hose. Detach the other end of the connector hose from the vacuum hose. Seal the connector hose with duct tape. Dispose of the towelette by placing it into a 6 mil clear disposal bag. Turn off the vacuum and seal the vacuum hose end or connect the appropriate attachment to vacuum the work area.



**6. CLEAN-UP AND TEAR DOWN PROCEDURES:**

1. Prior to handling debris and waste material, make sure they are wetted with amended water.
2. HEPA vacuum the work area, poly sheeting, tools, and equipment used during the Work Practice. Wet wipe the work area, poly sheeting, tools, and equipment used during the Work Practice. Return the tools and equipment to their storage location(s). HEPA vacuum and wet wipe the soles of the worker's feet to ensure no debris is transported out of the work area.
3. Place all debris, waste materials, and used cleaning materials and wipes into a 6 mil clear disposal bag. If waste material is minimal, used wet wipes can be sucked into the vacuum or placed into the 6 mil clear disposal bag.
4. Place cleaned tools and equipment outside the work area.
5. Wet-wipe the exterior of the 6 mil clear disposal bag. Remove the cleaned disposal bag from the work area.
6. Fold poly sheeting from the edges to the center to cover top of sheeting. Place poly sheeting in the 6 mil clear disposal bag.
7. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination and re-clean as necessary before the area is cleared for reoccupancy and access barriers are removed.
8. Remove gloves. Place the nitrile or vinyl disposable gloves in the 6 mil disposal bag.
9. Seal the 6 mil clear disposal bag. Contact your Lead Competent Person or Environmental Professional and perform any additional containerization, labeling, storage, manifesting, transport, and disposal of the bagged lead-based paint waste in accordance with his/her instructions.
10. Wash hands and face with soap and water upon leaving work area.

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## 7. DRILLING A HOLE DEEPER THAN THE NILFISK-ADVANCE® DUSTLESS DRILLING SYSTEM IS DESIGNED TO DRILL

If you need to drill a hole deeper than the NILFISK-ADVANCE® dustless drilling system is designed to drill, you can use the NILFISK-ADVANCE® system to start the hole and then finish with another drill that can drill the hole as deep as you need. **This activity can only be conducted if lead-based paint is limited to the surface of the wall to be drilled.**

1. Start by drilling a hole twice as wide as required with the NILFISK-ADVANCE® dustless drilling system.
2. Stop drilling with the NILFISK-ADVANCE® dustless drilling system after you have completely penetrated the lead-based paint (one- inch is usually sufficient).
3. Remove the drill bit as described in Section 5, step 10, page 4 (above).
4. Insert a plastic conduit bushing that fits the hole. Make sure that the conduit bushing completely covers the edge of the lead-based paint. Don't hammer the bushing when installing.
5. Using another drill with a longer bit, drill a hole of the required diameter through the center of the conduit bushing and into the wall. When drilling, stay in the center of the hole to avoid damaging the bushing.
6. Attach the hardware to the wall through the center of the conduit bushing. If necessary, remove the bushing prior to installing the hardware.


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# ATTACHMENT 12

## LBP31-WET WIRE BRUSHING OF LEAD-BASED PAINT FROM METAL, PLASTER, GYPSUM, OR WOOD

### 1. APPLICATION

This Work Practice applies to wet wire brushing of lead-based paint from metal, concrete, or wood lead-based paint-coated surfaces using hand-held wire brush.

**NOTE**

Wet wire brushing above the workers head is prohibited.

### 2. NOTES

All maintenance activities that may disturb lead-based paint must be authorized by the Lead Competent Person prior to beginning the work activity.

**All employees who will be engaged in this Work Practice must have received lead training, including training on this Work Practice.**

**As an authorized maintenance activity, this Work Practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot use this work practice.**

**For safety, this work practice requires a stable working surface.**

Ensure that the Work Practice can be conducted safely at an elevation. Only non-conductive (e.g., wood or fiberglass) ladders or other staging equipment of the correct load rating can be used. If you must work at an elevation of greater than 4 feet, you are required to comply with OSHA standards for working at elevation, including required training; OSHA standards require the use of body harnesses, lifelines, toe boards, railings, and other safety devices, as appropriate.

**Observe all local safety procedures and use any and all PPE required by the Lead Competent Person and your supervisor. Use of a respirator is not required for USPS personnel if the Work Practice is conducted following the steps listed below.**



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## 3. TOOLS AND EQUIPMENT FOR THIS WORK PRACTICE:

The equipment required for this Work Practice includes standard equipment required for most Work Practices and also specialized equipment as described below:

### 3.1. STANDARD EQUIPMENT

Standard equipment includes: Safety cones[1], barricade tape[2], 6 mil clear disposal bag[3], wet wipes (baby wipes), 4-mil or 6 mil poly sheeting[1], disposable towels or rags[1], duct tape[1], temporary work lights[1] (when required), amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water[1], wire brush[4], ground fault circuit interrupter (GFCI), ANSI approved ladder (when required), ANSI approved stable platform or staging (when required), disposable vinyl or nitrile gloves[1], work gloves[1].

#### 3.1.1. Specialized Equipment

Specialized equipment includes the NILFISK-ADVANCE GS80i HEPA Vacuum[5].

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[1] Standard materials or equipment that can be obtained at local hardware stores.
[2] The barricade tape shall have the words "WARNING - RESTRICTED AREA" repeatedly printed along its length. The tape can be obtained from Grainger at Grainger.com Part Number 1N912.
[3] Can be obtained from ARAMSCO, 1-800-767-6933, Part No 56173 (38”x60” bag) or Part No. 56206 (30”x40” bag).
[4] Standard wire brush for removing paint. Bristles can be carbon or stainless steel.
[5] Vacuum and accessories -NILFISK-ADVANCE GS 80i (Part No. 01790601) or GS 625 (Part No. 01798300) dust collector (vacuum) with 12" wheeled floor nozzle (Part No.1 1 1422) and 6" crevice nozzle (Part No. 81140900). Vacuum and accessories can be ordered under GSA Contract No. GS-07F-8356C.


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## 4. PRE-WORK ACTIVITIES CHECKLIST

1. Authorization to perform the work has been obtained from the Lead Competent Person. A safety talk on this Work Practice has been provided to USPS employees in the immediate vicinity of the work.
2. All employees engaged in the Work Practice have lead training, including training on this work practice.
3. All workers involved in the Work Practice have the appropriate PPE.
4. All required tools and equipment have been assembled, including standard equipment listed above.

## 5. WORK AREA PREPARATION CHECKLIST

1. Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the Work Practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape.
2. All electrical devices must be connected to a GFCI.
3. Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.
4. Turn on the vacuum and check for normal operating conditions:
   a. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
   b. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
   c. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
   d. Listen to the motor. If the motor is running fast or sounds high-pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone contact the Lead Competent Person or your supervisor to have the vacuum bag and/or filter replaced by an authorized contractor.

**NOTE**

For the GS 625 vacuum unit, bag, or filter, replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

6. HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

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## 6. CONDUCTING THE WORK PRACTICE

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Move moveable objects from the work area and cover the floor and immovable objects in the work area with poly sheeting. Make sure that the poly sheeting extends at least 6 feet in every direction from the limits of where the paint will be removed.
3. Place the tools, equipment, and materials needed into the work area.
4. All required tools and equipment have been assembled, e.g. vacuum hoses are in place.
5. Don the work gloves over the nitrile or vinyl gloves. Use safety glasses.
6. HEPA vacuum the painted surface where the paint will be wire brushed off to remove any loose or scaling paint.
7. The surface of the area to be wire brushed should be kept moist by lightly spraying with amended water. Avoid excessive spraying and dripping. Avoid accumulation of standing water on horizontal surfaces. If standing water is observed, clean up with disposable rags. Place used rags in the 6 mil clear disposal bag.
8. Begin wire brushing the paint off of the surface.
9. Ensure settled dust is kept wet until final clean-up by intermittently spraying dust with amended water. During the performance of this Work Practice, care should be taken to ensure that a slipping hazard does not exist.
10. Continue wire brushing until you have removed the paint from the desired surface area.

## 7. CLEAN-UP AND TEAR DOWN PROCEDURES

1. Prior to handling debris and waste material, make sure they are wetted with amended water.
2. HEPA vacuum the work area, poly sheeting, tools, and equipment used during the Work Practice. Wet wipe the work area, poly sheeting, tools, and equipment used during the Work Practice. Return the tools and equipment to their storage location(s). HEPA vacuum and wet wipe the soles of the worker's feet to ensure no debris is transported out of the work area.
3. Place all debris, waste materials, and used cleaning materials and wipes into a 6 mil clear disposal bag. If waste material is minimal, used wet wipes can be sucked into the vacuum or placed into the 6 mil clear disposal bag.
4. Place cleaned tools and equipment outside the work area.
5. Wet-wipe the exterior of the 6 mil clear disposal bag. Remove the cleaned disposal bag from the work area.
6. Fold poly sheeting from the edges to the center to cover top of sheeting. Place poly sheeting in the 6 mil clear disposal bag.
7. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination and re-clean as necessary before the area is cleared for reoccupancy and access barriers are removed.

8. Remove gloves. Place the nitrile or vinyl disposable gloves in the 6 mil clear disposal bag.
9. Seal the 6 mil clear disposal bag. Contact your Lead Competent Person or Environmental Professional and perform any additional containerization, labeling, storage, manifesting, transport, and disposal of the bagged lead-based paint waste in accordance with his/her instructions. Wash hands and face with soap and water upon leaving work area.



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## ATTACHMENT 13

### LBP32 - GRINDING FLAT OR EVEN SURFACES COATED WITH LEAD-BASED PAINT

### 1. APPLICATION

This Work Practice applies to grinding flat or even metal surfaces coated with lead-based paint using a NILFISK-ADVANCE® dustless grinding system attached to the NILFISK-ADVANCE® 625 or GS 80i HEPA vacuum to remove surface coatings and/or rust.

**NOTE**

Grinding above the worker's head is prohibited. The duration of this work practice is limited to 4 hours per day.

### 2. NOTES

All maintenance activities that may disturb lead-based paint must be authorized by the Lead Competent Person prior to beginning the work activity.

**All employees who will be engaged in this Work Practice must have received lead training, including training on this work practice.**

**As an authorized maintenance activity, this Work Practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot use this work practice.**

**Ensure that the Work Practice can be conducted safely at an elevation. Only non-conductive (e.g., wood or fiberglass) ladders or other staging equipment of the correct load rating can be used. If you must work at an elevation of greater than 4 feet, you are required to comply with OSHA standards for working at elevation, including required training, OSHA standards require the use of body harnesses, lifelines, toe boards, railings, and other safety devices, as appropriate.**

**The total time of a worker performing this task, including support tasks, cannot exceed a 4-hour time limit.**

**For safety, this Work Practice requires a stable working surface.**

**Observe all local safety procedures and use any and all PPE required by the Lead Competent Person and your supervisor. Use of a respirator is not required for USPS personnel if the Work Practice is conducted following the steps listed below.**

MAINTENANCE MANAGEMENT ORDER

## 3. TOOLS AND EQUIPMENT FOR THIS WORK PRACTICE

The equipment required for this Work Practice includes standard equipment required for most Work Practices and also specialized equipment as described below:

### 3.1. STANDARD EQUIPMENT

Standard equipment includes: Safety cones[1], barricade tape[2], 6 mil clear disposal bag[3], wet wipes (baby wipes), 4-mil or 6 mil poly sheeting[1], disposable towels or rags[1], duct tape[1], temporary work lights[1] (when required), amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water[1], ground fault circuit interrupter (GFCI), ANSI approved ladder (when required), ANSI approved stable platform or staging (when required), disposable vinyl or nitrile gloves[1], work gloves[1].

### 3.2. SPECIALIZED EQUIPMENT

Specialized equipment includes: NILFISK-ADVANCE of America, Inc. dustless 4.5" Pneumatic Sander with Dust Shroud, Part No. 01780155; GS 80i vacuum connection hose, Part No. 01716200 (3 meters); hose connection kit for shrouded tools, Part No. 01716720; 4.5” Conversion kit with Backup Pad, Part No. 01780145; 4.5” Clean-n-strip disc, Part No. 01780131.

NILFISK-ADVANCE GS 80i HEPA Vacuum or GS 625 HEPA Vacuum[4].

## 4. PRE-WORK ACTIVITIES CHECKLIST

1. Authorization to perform the work has been obtained from the Lead Competent Person. A safety talk on this Work Practice has been provided to USPS employees in the immediate vicinity of the work.
2. All employees engaged in the Work Practice have lead training including training on this work practice.
3. All workers involved in the Work Practice have the appropriate PPE.
4. All required tools and equipment have been assembled, including standard equipment listed above.

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[1] Standard materials or equipment that can be obtained at local hardware stores.

[2] The barricade tape shall have the words "WARNING - RESTRICTED AREA" repeatedly printed along its length. The tape can be obtained from Grainger at Grainger.com Part Number 1N912.

[3] Can be obtained from ARAMSCO, 1-800-767-6933, Part No 56173 (38”x60” bag) or Part No. 56206 (30”x40” bag).

[4] Vacuum and accessories - NILFISK-ADVANCE GS 80i (Part No. 01790601) or GS 625 (Part No. 01798300) dust collector (vacuum) with 12" wheeled floor nozzle (Part No. 82366900) and 6" crevice nozzle (Part No. 81140900). Vacuum and accessories can be ordered under GSA Contract No. GS-07F-8356C. Use of the GS 625 HEPA vacuum when grinding larger areas, surfaces in poor condition or in enclosed spaces is recommended, if possible.

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## 5. WORK AREA PREPARATION CHECKLIST

1. Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the Work Practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape.
2. All electrical devices must be connected to a GFCI.
3. Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.
4. Turn on the vacuum and check for normal operating conditions:
   a. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
   b. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
   c. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
   d. Listen to the motor. If the motor is running fast or sounds high-pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone contact the Lead Competent Person or your supervisor to have the vacuum bag and/or filter replaced by an authorized contractor.

**NOTE**

For the GS 625 vacuum unit, bag, or filter, replacement, is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

6. HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

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## 6. CONDUCTING THE WORK PRACTICE

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Move moveable objects from the work area and cover the floor and immovable objects in the work area with poly sheeting. Make sure that the poly sheeting extends at least 6 feet in every direction from the limits of where the paint will be removed.
3. Place the tools, equipment, and materials needed into the work area.
4. Assemble Equipment:
   a. Connect the hose to the HEPA vacuum.
   b. Do not connect the grinder to an electrical power source until the dustless grinder system is assembled.
   c. Connect the vacuum hose to the grinder shroud tube.
5. Don the work gloves over the nitrile or vinyl gloves. Use hearing protection and safety glasses.
6. Mark the area over which grinding will be performed. Do not position grinder closer than 2" to the nearest wall or other immovable object. If the shroud is obstructed by such items, it cannot function in the way required by this Work Practice.
7. Turn on the vacuum.
8. **Pull back the shroud to center the grinder in the marked-out area.** Release the shroud such that the full circumference of the shroud is in contact with the surface. **Make sure that the entire circumference of the shroud is in contact with the surface at all times while grinding.**
9. Grind the surface. Do not use excessive force. Allow the machine to do the work.
10. When grinding operation is completed, lift the grinder from the grinding surface and immediately turn off the grinder. Unplug the grinder from the GFCI.
11. Clean the surface with a wet rag or towelette: Keep power equipment and cords dry at all times.
12. Detach from the grinder the connector hose that connects it to the standard vacuum hose. Detach the other end of the connector hose from the vacuum hose. HEPA vacuum any loose material from the grinder and wet wipe the surfaces of the grinder. Seal the connector hose with duct tape. Dispose of the towelette by placing it into a 6 mil clear disposal bag. Turn off the vacuum and seal the vacuum hose end or connect the appropriate attachment to vacuum the work area.

## 7. CLEAN-UP AND TEAR DOWN PROCEDURES

1. Prior to handling debris and waste material, make sure they are wetted with amended water.
2. HEPA vacuum the work area, poly sheeting, tools, and equipment used during the Work Practice. Wet wipe the work area, poly sheeting, tools and equipment used during the Work Practice. Return the tools and equipment to their storage location(s). HEPA vacuum and wet wipe the soles of the worker's feet to ensure no debris is transported out of the work area.
3. Place all debris, waste materials, and used cleaning materials and wipes into a 6 mil clear disposal bag. If waste material is minimal, used wet wipes can be sucked into the vacuum or placed into the 6 mil clear disposal bag.
4. Place cleaned tools and equipment outside the work area. Remove work gloves.
5. Wet-wipe the exterior of the 6 mil clear disposal bag. Remove the cleaned disposal bag from the work area.
6. Fold poly sheeting from the edges to the center to cover top of sheeting. Place poly sheeting in the 6 mil clear disposal bag.
7. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination and re-clean as necessary before the area is cleared for reoccupancy and access barriers are removed.
8. Remove gloves. Place the nitrile or vinyl disposable gloves in the 6 mil clear disposal bag.
9. Seal the 6 mil clear disposal bag. Contact your Lead Competent Person or Environmental Professional and perform any additional containerization, labeling, storage, manifesting, transport, and disposal of the bagged lead-based paint waste in accordance with his/her instructions.
10. Wash hands and face with soap and water upon leaving work area.


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# ATTACHMENT 14

## LBP33 - WET SCRAPING OF LEAD-BASED PAINT FROM WOOD, METAL, CONCRETE, PLASTER, AND GYPSUM AT OR BELOW WORKER HEAD HEIGHT

### 1. APPLICATION

This Work Practice applies to wet scraping of lead-based paint from wood, metal, concrete, plaster, and gypsum using hand-held paint scraper at or below worker head height, including lead-based paint in poor and fair condition.

**NOTE**

Wet scraping above the worker's head is prohibited under this Work Practice.

### 2. NOTES

All maintenance activities that may disturb lead-based paint must be authorized by the Lead Competent Person prior to beginning the work activity.

**All employees who will be engaged in this Work Practice must have received lead training including training on this work practice.**

**As an authorized maintenance activity, this Work Practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot use this work practice.**

**For safety, this Work Practice requires a stable working surface.**

**Ensure that the Work Practice can be conducted safely at an elevation. Only non-conductive (e.g., wood or fiberglass) ladders or other staging equipment of the correct load rating can be used. If you must work at an elevation of greater than 4 feet, you are required to comply with OSHA standards for working at elevation, including required training, OSHA standards require the use of body harnesses, lifelines, toe boards, railings, and other safety devices, as appropriate.**

**Observe all local safety procedures and use any and all PPE required by the Lead Competent Person and your supervisor. Use of a respirator is not required for USPS personnel if the Work Practice is conducted following the steps listed below.**


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## 3. TOOLS AND EQUIPMENT FOR THIS WORK PRACTICE

The equipment required for this Work Practice includes standard equipment required for most Work Practices and also specialized equipment as described below:

### 3.1. STANDARD EQUIPMENT

Standard equipment includes: Safety cones[1], barricade tape[2], 6 mil clear disposal bag[3], wet wipes (baby wipes), 4-mil or 6 mil poly sheeting[1], disposable towels or rags[1], duct tape[1], temporary work lights[1] (when required), amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water[1], hand-held paint scraper[4], ground fault circuit interrupter (GFCI), ANSI approved ladder (when required), ANSI approved stable platform or staging (when required), disposable vinyl or nitrile gloves[1], work gloves[1].

### 3.2. SPECIALIZED EQUIPMENT

Specialized equipment includes a NILFISK-ADVANCE GS80i HEPA Vacuum[5].

## 4. PRE-WORK ACTIVITIES CHECKLIST:

1. Authorization to perform the work has been obtained from the Lead Competent Person. A safety talk on this Work Practice has been provided to USPS employees in the immediate vicinity of the work.
2. All employees engaged in the Work Practice have lead training, including training on this work practice.
3. All workers involved in the Work Practice have the appropriate PPE.
4. All required tools and equipment have been assembled, including standard and specialized equipment listed above.

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[1] Standard materials or equipment that can be obtained at local hardware stores.
[2] The barricade tape shall have the words "WARNING - RESTRICTED AREA" repeatedly printed along its length. The tape can be obtained from Grainger at Grainger.com Part Number 1N912.
[3] Can be obtained from ARAMSCO, 1-800-767-6933, Part No 56173 (38”x60” bag) or Part No. 56206 (30”x40” bag).
[4] Standard "pull" type paint scraper (do not use a flat bladed putty-knife type scraper).
[5] Vacuum and accessories -NILFISK-ADVANCE GS 80i (Part No. 01790601) or GS 625 (Part No. 01798300) dust collector (vacuum) with 12" wheeled floor nozzle (Part No.1 1 1422) and 6" crevice nozzle (Part No. 81140900). Vacuum and accessories can be ordered under GSA Contract No. GS-07F-8356C.

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## 5. WORK AREA PREPARATION CHECKLIST

1. Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the Work Practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape.
2. All electrical devices must be connected to a GFCI.
3. Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.
4. Turn on the vacuum and check for normal operating conditions:
   a. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
   b. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
   c. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
   d. Listen to the motor. If the motor is running fast or sounds high-pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone contact the Lead Competent Person or your supervisor to have the vacuum bag and/or filter replaced by an authorized contractor.

**NOTE**

For the GS 625 vacuum unit, bag, or filter, replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

6. HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

## 6. CONDUCTING THE WORK PRACTICE

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Move moveable objects from the work area and cover the floor and immovable objects in the work area with poly sheeting. Make sure that the poly sheeting extends at least 6 feet in every direction from the limits of where the paint will be removed.
3. Place the tools, equipment, and materials needed into the work area.
4. All required tools and equipment have been assembled, e.g. vacuum hoses are in place.
5. Don the work gloves over the nitrile or vinyl gloves. Use safety glasses.
6. HEPA vacuum the painted surface where the paint will be scraped off to remove any loose or scaling paint.

7. The surface of the area to be scraped should be kept moist by lightly spraying with amended water. Avoid excessive spraying and dripping. Avoid accumulation of standing water on horizontal surfaces. If standing water is observed, clean up with disposable rags. Place used rags in the 6 mil clear disposal bag.
8. Keep power equipment and cords dry at all times.
9. Begin scraping the paint off of the surface.
10. Ensure scrapings are kept wet until final clean-up by intermittently spraying dust with amended water. During the performance of this Work Practice, care should be taken to ensure that a slipping hazard does not exist.
11. Continue scraping until you have removed the paint from the desired surface area.



**7. CLEAN-UP AND TEAR DOWN PROCEDURES**

1. Prior to handling debris and waste material, make sure they are wetted with amended water.
2. HEPA vacuum the work area, poly sheeting, tools, and equipment used during the Work Practice. Wet wipe the work area, poly sheeting, tools, and equipment used during the Work Practice. Return the tools and equipment to their storage location(s). HEPA vacuum and wet wipe the soles of the worker's feet to ensure no debris is transported out of the work area.
3. Place all debris, waste materials, and used cleaning materials and wipes into a 6 mil clear disposal bag. If waste material is minimal, used wet wipes can be sucked into the vacuum or placed into the 6 mil clear disposal bag.
4. Place cleaned tools and equipment outside the work area.
5. Wet-wipe the exterior of the 6 mil clear disposal bag. Remove the cleaned disposal bag from the work area.
6. Fold poly sheeting from the edges to the center to cover top of sheeting. Place poly sheeting in the 6 mil clear disposal bag.
7. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination and re-clean as necessary before the area is cleared for reoccupancy and access barriers are removed.
8. Remove gloves. Place the nitrile or vinyl disposable gloves in the 6 mil clear disposal bag.
9. Seal the 6 mil clear disposal bag. Contact your Lead Competent Person or Environmental Professional and perform any additional containerization, labeling, storage, manifesting, transport, and disposal of the bagged lead-based paint waste in accordance with his/her instructions.
10. Wash hands and face with soap and water upon leaving work area.

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**ATTACHMENT 15**

## LBP35 - REMOVING OR REPLACING WOOD PANELS/GLASS PANES FROM DOORS OR WINDOWS COATED WITH LEAD-BASED PAINT

### 1. APPLICATION

This Work Practice applies to removing or replacing wood panels/glass panes from doors or windows coated with lead-based paint.

### 2. NOTES

All maintenance activities that may disturb lead-based paint must be authorized by the Lead Competent Person prior to beginning the work activity.

**All employees who will be engaged in this Work Practice must have received lead training, including training on this work practice.**

**As an authorized maintenance activity, this Work Practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot use this work practice.**

**For safety, this Work Practice requires a stable working surface.**

**Ensure that the Work Practice can be conducted safely at an elevation. Only non-conductive (e.g., wood or fiberglass) ladders or other staging equipment of the correct load rating can be used. If you must work at an elevation of greater than 4 feet, you are required to comply with OSHA standards for working at elevation, including required training, OSHA standards require the use of body harnesses, lifelines, toe boards, railings, and other safety devices, as appropriate.**

**Observe all local safety procedures and use any and all PPE required by the Lead Competent Person and your supervisor. Use of a respirator is not required for USPS personnel if the Work Practice is conducted following the steps listed below.**



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## 3. TOOLS AND EQUIPMENT FOR THIS WORK PRACTICE

The equipment required for this Work Practice includes standard equipment required for most Work Practices and also specialized equipment as described below:

### 3.1. STANDARD EQUIPMENT

Standard equipment includes: Standard hand tools (chisel, screwdriver, utility knife, hammer), safety cones[1], barricade tape[2], 6 mil clear disposal bag[3], wet wipes (baby wipes), 6 mil poly sheeting[1], disposable towels or rags[1], duct tape[1], temporary work lights[1] (when required), amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water[1], Utility knife[1], ground fault circuit interrupter (GFCI), ANSI approved ladder (when required), ANSI approved stable platform or staging (when required), disposable vinyl or nitrile gloves[1], work gloves[1].

### 3.2. SPECIALIZED EQUIPMENT

Specialized equipment includes a NILFISK-ADVANCE GS80i HEPA Vacuum[4].

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[1] Standard materials or equipment that can be obtained at local hardware stores.
[2] The barricade tape shall have the words "WARNING - RESTRICTED AREA" repeatedly printed along its length. The tape can be obtained from Grainger at Grainger.com Part Number 1N912.
[3] Can be obtained from ARAMSCO, 1-800-767-6933, Part No 56173 (38”x60” bag) or Part No. 56206 (30”x40” bag).
[4] Vacuum and accessories -NILFISK-ADVANCE GS 80i (Part No. 01790601) or GS 625 (Part No. 01798300) dust collector (vacuum) with 12" wheeled floor nozzle (Part No.1 1 1422) and 6" crevice nozzle (Part No. 81140900). Vacuum and accessories can be ordered under GSA Contract No. GS-07F-8356C.


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## 4. PRE-WORK ACTIVITIES CHECKLIST

1. Authorization to perform the work has been obtained from the Lead Competent Person. A safety talk on this Work Practice has been provided to USPS employees in the immediate vicinity of the work.
2. All employees engaged in the Work Practice have lead training, including training on this work practice.
3. All workers involved in the Work Practice have the appropriate PPE.
4. All required tools and equipment have been assembled, including standard and specialized equipment listed above.

## 5. WORK AREA PREPARATION CHECKLIST

1. Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the Work Practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape.
2. All electrical devices must be connected to a GFCI.
3. Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.
4. Turn on the vacuum and check for normal operating conditions:
   a. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
   b. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
   c. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
   d. Listen to the motor. If the motor is running fast or sounds high-pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the Lead Competent Person or your supervisor to have the vacuum bag and/or filter replaced by an authorized contractor.

**NOTE**

For the GS 625 vacuum unit, bag, or filter, replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

6. HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

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## 6. CONDUCTING THE WORK PRACTICE

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Move moveable objects from the work area and cover the floor and immovable objects in the work area with poly sheeting. Make sure that the poly sheeting extends at least 6 feet in every direction from the limits of where the paint will be removed.
3. Place the tools, equipment, and materials needed into the work area.
4. All required tools and equipment have been assembled, e.g. vacuum hoses are in place.
5. Don the work gloves over the nitrile or vinyl gloves. Use safety glasses.
6. HEPA vacuum the painted surfaces (including window troughs) to remove any loose or scaling paint.
7. The painted surfaces should be kept moist by spraying with amended water. Avoid excessive spraying and dripping. Avoid accumulation of standing water on horizontal surfaces. If standing water is observed, clean up with disposable rags. Place used rags in the 6 mil clear disposal bag.
8. Remove fasteners and pry off facing materials as necessary using only standard hand tools, for example chisel, hammer, or screwdriver. Use a utility knife to score the lead-based paint at pane or panel to prevent tear-out.
9. Ensure settled dust is kept wet until final clean-up by intermittently spraying chips and dust with amended water. During the performance of this Work Practice, care should be taken to ensure that a slipping hazard does not exist.
10. Wrap and seal door panel or window pane and associated components in 6-mil poly sheeting upon removal. Place the wrapped objects inside the 6 mil clear disposal bag.

## 7. CLEAN-UP AND TEAR DOWN PROCEDURES

1. Prior to handling debris and waste material, make sure they are wetted with amended water.
2. HEPA vacuum the work area, poly sheeting, tools, and equipment used during the Work Practice. Wet wipe the work area, poly sheeting, tools, and equipment used during the Work Practice. Return the tools and equipment to their storage location(s). HEPA vacuum and wet wipe the soles of the worker's feet to ensure no debris is transported out of the work area.
3. Place all debris, waste materials, and used cleaning materials and wipes into a 6 mil clear disposal bag. If waste material is minimal, used wet wipes can be sucked into the vacuum or placed into the 6 mil clear disposal bag.
4. Place cleaned tools and equipment outside the work area.
5. Wet-wipe the exterior of the 6 mil clear disposal bag. Remove the cleaned disposal bag from the work area.
6. Fold poly sheeting from the edges to the center to cover top of sheeting. Place poly sheeting in the 6 mil clear disposal bag.
7. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination and re-clean as necessary before the area is cleared for reoccupancy and access barriers are removed.

8. Remove gloves. Place the nitrile or vinyl disposable gloves in the 6 mil clear disposal bag.
9. Seal the 6 mil clear disposal bag. Contact your Lead Competent Person or Environmental Professional and perform any additional containerization, labeling, storage, manifesting, transport, and disposal of the bagged lead-based paint waste in accordance with his/her instructions.
10. Wash hands and face with soap and water upon leaving work area.



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# ATTACHMENT 16

## LBP36 - DRILLING HOLES THROUGH LEAD-BASED PAINT USING STANDARD DRILL

### 1. APPLICATION

This Work Practice applies to drilling holes through lead-based paint on flat metal, irregular metal, plaster or gypsum walls, wood, or concrete using a standard drill to attach hooks, picture hangers, screws, brackets, and/or other hardware.

**NOTE**

If the wall or floor where the bit will exit is painted with lead-based paint, attempt to measure the thickness of the surface and drill halfway in from both sides, in accordance with this Work Practice. A hole can be drilled through a wall with this work practice if the wall where the bit will exit is painted with lead-based paint, only if precautions in this practice are followed. Whenever possible, align and drill holes using this practice from both sides of the wall. This practice cannot be used for drilling over the worker's head.

### 2. NOTES

All maintenance activities that may disturb lead-based paint must be authorized by the Lead Competent Person prior to beginning the work activity.

**All employees who will be engaged in this Work Practice must have received lead training, including training on this work practice.**

**As an authorized maintenance activity, this Work Practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot use this work practice.**

**For safety, this Work Practice requires a stable working surface.**

**Ensure that the Work Practice can be conducted safely at an elevation. Only non-conductive (e.g., wood or fiberglass) ladders or other staging equipment of the correct load rating can be used. If you must work at an elevation of greater than 4 feet, you are required to comply with OSHA standards for working at elevation, including required training, OSHA standards require the use of body harnesses, lifelines, toe boards, railings, and other safety devices, as appropriate.**

**Prior to drilling, verify that you will not penetrate electrical lines, water lines, or other utilities.**

**Observe all local safety procedures and use any and all PPE required by the Lead Competent Person and your supervisor. Use of a respirator is not required for USPS personnel if the Work Practice is conducted following the steps listed below.**

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## 3. TOOLS AND EQUIPMENT FOR THIS WORK PRACTICE

The equipment required for this Work Practice includes standard equipment required for most Work Practices and also specialized equipment as described below:

### 3.1. STANDARD EQUIPMENT

Standard equipment includes: Safety cones[1], barricade tape[2], 6 mil clear disposal bag[3], wet wipes (baby wipes), 4-mil or 6 mil poly sheeting[1], disposable towels or rags[1], duct tape[1], temporary work lights[1] (when required), amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water[1], ground fault circuit interrupter (GFCI), ANSI approved ladder (when required), ANSI approved stable platform or staging (when required), disposable vinyl or nitrile gloves[1], work gloves[1].

### 3.2. SPECIALIZED EQUIPMENT

Specialized equipment includes: Standard Pistol-grip Drill[4], NILFISK-ADVANCE GS80i HEPA Vacuum[5].

## 4. PRE-WORK ACTIVITIES CHECKLIST

1. Authorization to perform the work has been obtained from the Lead Competent Person. A safety talk on this Work Practice has been provided to USPS employees in the immediate vicinity of the work.
2. All employees engaged in the Work Practice have lead training, including training on this work practice.
3. All workers involved in the Work Practice have the appropriate PPE.
4. All required tools and equipment have been assembled, including standard equipment listed above.
5. Check the location where the drill bit will exit to determine if it is lead based paint. If it is not a lead containing material, ensure that a bystander will not be injured by the exiting drill bit.

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[1] Standard materials or equipment that can be obtained at local hardware stores.
[2] The barricade tape shall have the words "WARNING - RESTRICTED AREA" repeatedly printed along its length. The tape can be obtained from Grainger at Grainger.com Part Number 1N912.
[3] Can be obtained from ARAMSCO, 1-800-767-6933, Part No 56173 (38”x60” bag) or Part No. 56206 (30”x40” bag).
[4] Standard pistol-grip drill, corded or cordless battery. Drill chuck size not to exceed 1/2-inch. Drill cannot have a hammer-drill feature. Cordless battery drill is not to exceed 24 volts. Corded drill is not to exceed 7 amps, 120 volts, or 2,500 maximum RPM.
[5] Vacuum and accessories -NILFISK-ADVANCE GS 80i (Part No. 01790601) or GS 625 (Part No. 01798300) dust collector (vacuum) with 12" wheeled floor nozzle (Part No.1 1 1422) and 6" crevice nozzle (Part No. 81140900). Vacuum and accessories can be ordered under GSA Contract No. GS-07F-8356C.

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## 5. WORK AREA PREPARATION CHECKLIST

1. Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the Work Practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape.
2. All electrical devices must be connected to a GFCI.
3. Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.
4. Turn on the vacuum and check for normal operating conditions:
   a. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
   b. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
   c. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
   d. Listen to the motor. If the motor is running fast or sounds high-pitched, the bag may be full or the filter clogged.

   If the vacuum is not operating normally or if the manometer gauge is in the red zone contact the Lead Competent Person or your supervisor to have the vacuum bag and/or filter replaced by an authorized contractor.

**NOTE**

For the GS 625 vacuum unit, bag, or filter, replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

5. HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

## 6. CONDUCTING THE WORK PRACTICE

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Move moveable objects from the work area and cover the floor and immovable objects in the work area with poly sheeting. Make sure that the poly sheeting extends at least 6 feet in every direction from the limits of where the paint will be removed.
3. Place the tools, equipment, and materials needed into the work area.
4. All required tools and equipment have been assembled, e.g. bit is in place.
5. If the hole to be drilled will penetrate the wall, a debris collection device can be used on the opposite side wall to collect the non-lead-based paint debris disturbed when the bit exits the wall. Poly sheeting on the floor or a plastic sheet loosely taped over the exit location are both acceptable solutions. If drilling completely through the wall and the exit also has lead based paint apply shaving cream to the exit hole location and place disposable towel on the floor below the hole.
6. Don the gloves, hearing protection, and safety glasses.
7. HEPA vacuum the painted surface where the paint will be drilled to remove any loose or scaling paint.
8. Drill the hole(s). Do not use excessive force. Allow the machine to do the work.
9. Ensure settled dust is kept wet until final clean-up by intermittently spraying dust with amended water. During the performance of this Work Practice, care should be taken to ensure that a slipping hazard does not exist
10. After drilling to the desired depth and the flutes of the bit pull loose material from the hole, withdraw the bit and stop the drill.
11. Clean the drill insertion point with a moist towelette. Wipe the dust and debris from around the drill hole. Go to the exit hole location and wipe the shaving cream area with a clean disposable towel. Pick up the towel on the floor and dispose of both in a 6 mil clear disposal bag.
12. If there are more holes ready to drill, prepare to drill the next hole (follow steps 7 through 11).
13. If there are no more holes to drill, wipe off the bit with a disposable, moistened towelette. Dispose of the towelette by sucking it into the HEPA vacuum or by placing it into a 6 mil clear disposal bag.


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## 7. CLEAN-UP AND TEAR DOWN PROCEDURES

1. Prior to handling debris and waste material, make sure they are wetted with amended water.
2. HEPA vacuum the work area, poly sheeting, tools, and equipment used during the Work Practice. Wet wipe the work area, poly sheeting, tools and equipment used during the Work Practice. Return the tools and equipment to their storage location(s). HEPA vacuum and wet wipe the soles of the worker's feet to ensure no debris is transported out of the work area.
3. Place all debris, waste materials, and used cleaning materials and wipes into a 6 mil clear disposal bag. If waste material is minimal, used wet wipes can be sucked into the vacuum or placed into the 6 mil clear disposal bag.
4. Place cleaned tools and equipment outside the work area.
5. Wet-wipe the exterior of the 6 mil clear disposal bag. Remove the cleaned disposal bag from the work area.
6. Fold poly sheeting from the edges to the center to cover top of sheeting. Place poly sheeting in the 6 mil clear disposal bag.
7. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination and re-clean as necessary before the area is cleared for reoccupancy and access barriers are removed.
8. Remove the gloves and place them in the 6 mil clear disposal bag.
9. Seal the 6 mil clear disposal bag. Contact your Lead Competent Person or Environmental Professional and perform any additional containerization, labeling, storage, manifesting, transport, and disposal of the bagged lead-based paint waste in accordance with his/her instructions.
10. Wash hands and face with soap and water upon leaving work area.


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