Chapter DHS 163

APPENDIX C

CLEANING WHEN LEAD–BASED PAINT HAS BEEN DISTURBED

Chapter 14, HUD Guidelines for the Evaluation and Control of Lead–Based Paint Hazards in Housing

www.hud.gov/offices/lead/lbp/hudguidelines/Ch14.pdf

Step–by–Step Summary
Cleaning: How To Do It

1. Include step–by–step procedures for precleaning, cleaning during the job, and daily and final cleanings in project design or specifications.
2. Assign responsibilities to specific workers for cleaning and for maintaining cleaning equipment.
3. Have sufficient cleaning equipment and supplies *before* beginning work.
4. If contamination is extensive, conduct precleaning of the dwelling unit. Move or cover all furniture and other objects.
5. Conduct ongoing cleaning during the job, including regular removal of large and small debris and dust. Decontamination of all tools, equipment, and worker protection gear is required before it leaves containment areas. Electrical equipment should be wiped and high–efficiency particulate air (HEPA) vacuumed, not wetted down, to minimize electrocution hazards.
6. Schedule sufficient time (usually 30 minutes to an hour) for a complete daily cleaning, starting at the same time near the end of each workday after lead hazard control activity has ceased.
7. For final cleaning, wait at least 1 hour after active lead hazard control activity has ceased to let dust particles settle.
8. Use a vacuum cleaner equipped with a HEPA exhaust filter. HEPA vacuum all surfaces in the room (ceilings, walls, trim, and floors). Start with the ceiling and work down, moving toward the entry door. Completely clean each room before moving on.
9. Wash all surfaces with a lead–specific detergent, high–phosphate detergent, or other suitable cleaning agent to dislodge any ground–in contamination, then rinse. Change the cleaning solution after every room is cleaned.
10. Repeat step 8. To meet clearance standards consistently, a HEPA vacuum, wet wash, and HEPA vacuum cycle is recommended. For interim control projects involving dust removal only, the final HEPA vacuuming step is usually not needed (see Chapter 11). Other cleaning methods are acceptable, as long as clearance criteria are met and workers are not overexposed.
11. After final cleaning, perform a visual examination to ensure that all surfaces requiring lead hazard control have been addressed and all visible dust and debris have been removed. Record findings and correct any incomplete work. This visual examination should be performed by the owner or an owner's representative who is independent of the lead hazard control contractor.
12. If other construction work will disturb the lead–based paint surfaces, it should be completed at this point. If those surfaces are disturbed, repeat the final cleaning step after the other construction work has been completed.
13. Paint or otherwise seal treated surfaces and interior floors.

14. Conduct a clearance examination (see Chapter 15).

15. If clearance is not achieved, repeat the final cleaning.

16. Continue clearance testing and repeated cleaning until the dwelling achieves compliance with all clearance standards. As an incentive to conduct ongoing cleaning and a thorough final cleaning, the cost of repeated cleaning after failing to achieve clearance should be borne by the contractor as a matter of the job specification, not the owner.

17. Do not allow residents to enter the work area until cleaning is completed and clearance is established.

18. Cleaning equipment list:

    * HEPA vacuums.

    * Detergent.

    * Waterproof gloves.

    * Rags.

    * Sponges.

    * Mops.

    * Buckets.

    * HEPA vacuum attachments (crevice tools, beater bar for cleaning rugs).

    * 6–mil plastic bags.

    * Debris containers.

    * Waste water containers.

    * Shovels.

    * Rakes.

    * Water–misting sprayers.

    * 6–mil polyethylene sheeting (or equivalent).

Chapter 14: Cleaning

I. Introduction

This chapter describes cleaning procedures to be employed following abatement and interim control work. Dust removal as an interim control measure is covered in Chapter 11.

All lead hazard control activities can produce dangerous quantities of leaded dust. Unless this dust is properly removed, a dwelling unit will be more hazardous after the work is completed than it was originally. Once deposited, leaded dust is difficult to clean effectively. Whenever possible, ongoing and daily cleaning of leaded dust during lead hazard control projects is recommended. Ongoing and daily cleaning is also necessary to minimize worker exposures.

Cleaning is the process of removing visible debris *and* dust particles too small to be seen by the naked eye. Removal of lead–based paint hazards in a dwelling unit will not make the unit safe unless excessive levels of leaded dust are also removed. This is true regardless of whether the dust was present before or generated by the lead hazard control process itself. Improper cleaning can increase the cost of a project considerably because additional cleaning and clearance sampling will be necessary. However, cleaning and clearance can be achieved routinely if care and diligence are exercised.

A. Performance Standard

Although the cleaning methods described in this chapter are feasible and have been shown to be effective in meeting clearance standards, other methods may also be used if they are safe and effective. This performance–oriented approach should stimulate innovation, reduce cost, and ensure safe conditions for both residents and workers.

B. Small Dust Particles

Dust particles that are invisible to the naked eye remain on surfaces after ordinary cleaning procedures. A visibly clean surface may contain high and unacceptable levels of dust particles and require special cleaning procedures.

C. Difficulties in Cleaning

While cleaning is an integral and essential component of any lead hazard control activity, it is also the most likely part of the activity to fail.

Several common reasons for this failure include low clearance standards, worker inexperience, high dust–producing methods, and deadlines.

1. Low Clearance Standards

Because very small particles of leaded dust are easily absorbed by the body when ingested or inhaled, a small amount can create a health hazard for young children. Therefore, "clearance standards" are extremely low for acceptable levels of leaded dust particles on surfaces after hazard control activities, and careful cleaning procedures are required. Although it is not possible to remove *all* leaded dust from a dwelling, it is possible to reduce it to a safe level.

Clearance standards are described more fully in Chapter 15. The permissible amount of leaded dust remaining on each of the following surfaces following lead hazard work is as follows:

* 100 µg/ft2 on floors.
* 500 µg/ft2 on interior window sills (stools).
* 800 µg/ft2 on window troughs (the area where the sash sits when closed).
* 800 µg/ft2 on exterior concrete.

These levels are based on wipe sampling. Clearance testing determines whether the premises or area are clean enough to be reoccupied after the completion of a lead paint hazard control project. A cleaned area may not be reoccupied until compliance with clearance standards has been established. To prevent delays, final testing and final cleaning activities should be coordinated.

2. Worker Inexperience

To understand the level of cleanliness required to meet the established clearance standards for hazard control cleanup, new hazard control personnel often require a significant reorientation to cleaning. Many construction workers are used to cleaning up only dust that they can see, not the invisible dust particles that are also important to remove.

3. High Dust–Producing Methods and/or Inadequate Containment

High dust–generating methods, inadequate containment during hazard control work, and poor work practices can all make achievement of clearance particularly difficult. Work practices necessary to prevent spreading of dust throughout a dwelling (e.g., by tracking dust out of work areas) are essential but sometimes tedious. Essential work practices are sometimes mistakenly considered to be "flexible guidelines" rather than necessary standards that are designed to ensure that the job is completed, not only safely, but also on time and within budget.

4. Deadlines

Daily and final cleanings have sometimes been compromised due to project deadlines, since cleaning comes at the end of the job. Hurried efforts often result in clearance failure. Delayed and over–budget hazard control projects are often the result of repeated, unplanned recleanings that are necessitated by inadequate containment and sloppy work practices.

II. Coordination of Cleaning Activities

A. Checklist

The owner or contractor may use the following cleaning checklist before any lead hazard control activity:

✓Is the critical importance of cleaning in a hazard control project understood?

✓Have all workers been trained and certified for hazard control work?

✓Have the precleaning, daily, and final cleanings been scheduled properly and coordinated with the other participants in the hazard control process?

✓Have cleaning equipment and materials been obtained?

✓Do the workers know how to operate and maintain special cleaning equipment, and do they have directions for the proper use of all cleaning materials?

✓Have all workers carefully studied the step–by–step procedures for precleaning (if needed), in–progress cleaning, and daily and final cleanings?

✓Are all workers properly protected during the cleaning processes (see Chapter 9)?

✓Have provisions been made to properly contain and store potentially hazardous debris (see Chapter 10)?

✓Have dust–clearance testing and related visual inspections been arranged (see Chapter 15)?

✓Are the clearance criteria to be met fully understood?

✓Have all appropriate surfaces been properly painted or otherwise sealed?

✓Have appropriate records been maintained that document participants' roles in the hazard control project?

B. Equipment Needed for Cleaning

The following equipment is needed to conduct cleaning: high–efficiency particulate air (HEPA) vacuums and attachments (crevice tools, beater bar for cleaning rugs), detergent, waterproof gloves, rags, sponges, mops, buckets, 6–mil plastic bags, debris containers, waste water containers, shovels, rakes, water–misting sprayers, and 6–mil polyethylene plastic sheeting (or equivalent).

C. Waste Disposal

Regulations governing hazardous and nonhazardous waste storage, transportation, and disposal affect both the daily and final cleaning procedures. The hazard control contractor and the disposal contractor should work together to establish formal written procedures, specifying selected containers, storage areas, and debris pickups, to ensure that all relevant regulations are met.

III. Cleaning Methods and Procedures

Many of the special cleaning methods and procedures detailed in this chapter are not standard operating procedure for general home improvement contractors. Therefore, project designers, responsible agencies, or owners must ensure that contractors follow the methods and procedures recommended herein or specially designed alternative procedures, even though some may appear to be redundant and unnecessary. These methods have been shown to be feasible and effective in many situations and skipping steps in the cleaning procedures can be counterproductive.

A. Containment

Because of the difficulty involved in the removal of fine dust, dust generated by hazard control work should be contained to the extent possible to the inside of work areas. Inadequately constructed or maintained containment or poor work practices will result in additional cleaning efforts, due to dust that has leaked out or been tracked out of the work area (see Chapter 8).

B. Basic Cleaning Methods: Wet Wash and Vacuum Cleaning Techniques

Because leaded dust adheres tenaciously, especially to such rough or porous materials as weathered or worn wood surfaces and masonry surfaces (particularly concrete), workers should be trained in cleaning methods. As a motivator, some contractors have awarded bonuses to workers who pass clearance the first time.

Two basic cleaning methods have proven effective, when used concurrently, in lead–based paint hazard control projects: a special vacuum cleaner equipped with a HEPA exhaust filter, followed by wet washing

with special cleaning agents and rinsing, followed by a final pass with the HEPA vacuum.

Although HEPA filtered vacuums and trisodium phosphate (TSP) cleaners have been considered the standard cleaning tools for lead hazard control projects, new research, discussed under the "Alternatives Methods" section in this chapter, suggests that other tools and products may also be effective in efficiently cleaning dust while providing adequate worker protection from airborne exposure risks. Some of these innovations may even be superior.

1. HEPA Vacuuming

HEPA vacuums differ from conventional vacuums in that they contain high–efficiency filters that are capable of trapping extremely small, micron–sized particles. These filters can remove particles of 0.3 microns or greater from air at 99.97 percent efficiency or greater. (A micron is 1 millionth of a meter, or about 0.00004 inches.) Some vacuums are equipped with an ultra–low penetration air (ULPA) filter that is capable of filtering out particles of 0.13 microns or greater at 99.9995 percent efficiency. However, these ULPA filters are slightly more expensive, and may be less available than HEPA filters.

Vacuuming with conventional vacuum machines is unlikely to be effective, because much of the fine dust will be exhausted back into the environment where it can settle on surfaces. A recent Canadian study revealed that fine dust air levels were exceedingly high when a standard portable vacuum with a new bag was used, although partially filled bags were found to be more efficient (CMHC, 1992). Considerations for the proper use of a HEPA vacuum are listed below.

Operating Instructions

There are a numerous manufacturers of HEPA vacuums. Although all HEPA vacuums operate on the same general principle, they may vary considerably with respect to specific procedures, such as how to change the filters. To ensure the proper use of equipment, the manufacturer's operating instructions should be carefully followed and if possible, training sessions arranged with the manufacturer's representative.

Although HEPA vacuums have the same "suction" capacity as ordinary vacuums that are comparably sized, their filters are more efficient. Improper cleaning or changing of HEPA filters may reduce the vacuum's suction capability.

Special Attachments

Because the HEPA vacuum will be used to vacuum surfaces other than floors, operators should buy attachments and appropriate tool kits for use on different surfaces — such as brushes of various sizes, crevice tools, and angular tools.

Selecting Appropriate Size(s)

HEPA vacuums are available in numerous sizes, ranging from a small lunchbucket–sized unit to track–mounted systems. Two criteria for size selection are the size of the job and the type of electrical power available. Manufacturer recommendations should be followed.

Wet–Dry HEPA Vacuums

Some hazard control contractors have found the wet–dry HEPA vacuums to be particularly effective in meeting clearance standards. These vacuums are equipped with a special shut–off float switch to protect the electrical motor from water contact.

Prefilters

HEPA filters are usually used in conjunction with a prefilter or series of prefilters that trap the bulk of the dust in the exhaust airstream, particularly the larger particles. The HEPA filter traps most of the remaining small particles that have passed through the prefilter(s). All filters must be maintained and replaced or cleaned as specified in the manufacturer's instructions. Failure to do so may cause a reduction in suction power (thus reducing the vacuum's efficiency and effectiveness). Failure to change prefilters may damage the vacuum motor and will also shorten the service life of the HEPA filter, which is far more expensive than the prefilters.

HEPA Vacuuming Procedures

Surfaces frequently vacuumed include ceilings, walls, floors, windows, interior and exterior sills, doors, heating, ventilation, and air conditioning (HVAC) equipment (heating diffusers, radiators, pipes, vents), fixtures of any kind (light, bathroom, kitchen), built–in cabinets, and appliances.

To aid in dislodging and collecting deep dust and lead from carpets, the HEPA vacuum must be equipped with a beater bar (agitator head) that is fixed to the cleaning head. This bar should be used on all passes on the carpet face during dry vacuuming (see Chapter 11 for details on carpet and furniture cleaning).

All rooms and surfaces should be included in the HEPA vacuum process, except for those that (1) were

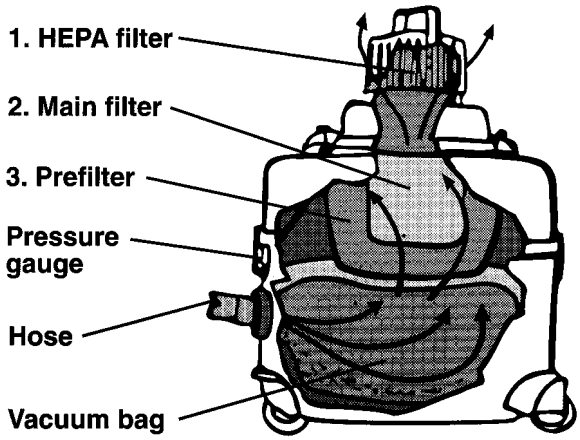
found not to have lead–paint hazards *and* were properly separated from work areas before the process began (see Chapter 8), or (2) were never entered during the process. Porches, sidewalks, driveways, and other exterior surfaces should be vacuumed if exterior hazard control work was conducted, or if debris was stored or dropped outside. Vacuuming should begin on the ceilings and end on the floors, sequenced to avoid passing through rooms already cleaned, with the dwellings' entryway cleaned last.

Emptying the HEPA Vacuum

Used filters and vacuumed debris are potentially hazardous waste and should be treated accordingly (see Chapter 10). Therefore, operators should use extreme caution when opening the HEPA vacuum for filter replacement or debris removal to avoid accidental release of accumulated dust into the environment. This may occur, for example, if the vacuum's seal has been broken and the vacuum's bag is disturbed.

Operators should also wear a full set of protective clothing and equipment, including appropriate respirators, when performing this maintenance function, which should be done in the containment area or offsite.

Figure 14.1a Vacuum With a HEPA Filter.



Parts of a HEPA-vacuum

Most HEPA-vacuums have three filters: HEPA filter, main filter, and pre-filter. Debris gets sucked in through the hose into the vacuum bag. The air and dust get filtered through the pre-filter, the main filter, and the HEPA filter. The HEPA filter captures the lead dust before the air is released into the work area again.

2. Wet Detergent Wash

Several types of detergents have been used to remove leaded dust. Those with a high–phosphate content (containing at least 5 percent trisodium phosphate, also known as TSP) have been found to be effective when used as part of the final cleaning process (Milar, 1982). TSP detergents are thought to work by coating the surface of dusts with phosphate or polyphosphate groups which reduces electrostatic interactions with other surfaces and thereby permits easier removal. Because of environmental concerns some States have restricted the use of TSP, and some manufacturers have eliminated phosphates from their household detergents. However, high–TSP detergents can usually be found in hardware stores and may be permitted for limited use, such as lead hazard control.

Other non–TSP cleaning agents developed specifically for removing leaded dust have also been found to be effective (possibly more effective than TSP) in limited trials by several investigators (Grawe, 1993; Wilson, 1993) and may also be safer, since TSP is a skin and eye irritant. See section VII for more information on non–TSP detergents. Proper procedures for using high–phosphate detergents also apply to most other types of detergents and include the following steps:

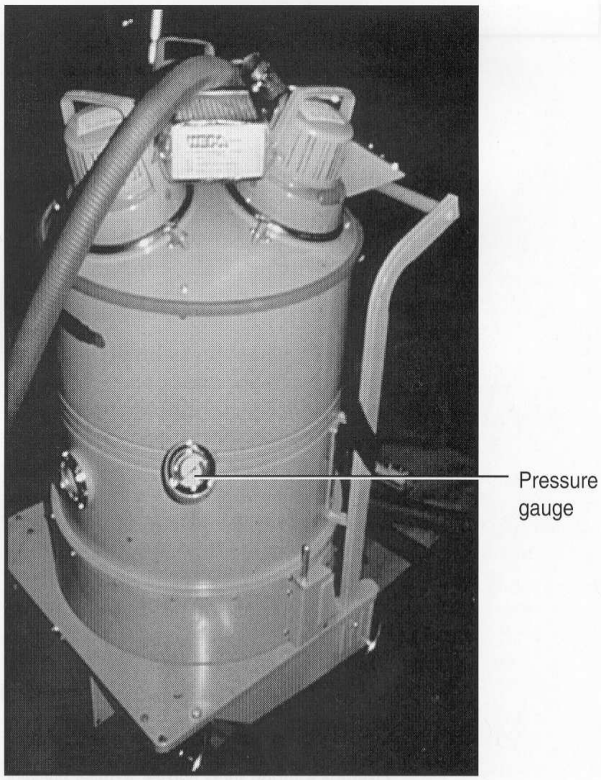


Figure 14.1b Pressure Gauge Indicator Shows When Filters Require Changing.

Manufacturer's Dilution Instructions

Users of cleaning agents for leaded dust removal should follow manufacturer's instructions for the proper use of a product, especially the recommended dilution ratio. Even diluted, trisodium phosphate is a skin irritant and users should wear waterproof gloves. Eye protection should also be worn, and portable eyewash facilities should be located in or very near the work area. Consult manufacturer's directions for the use of other detergents.

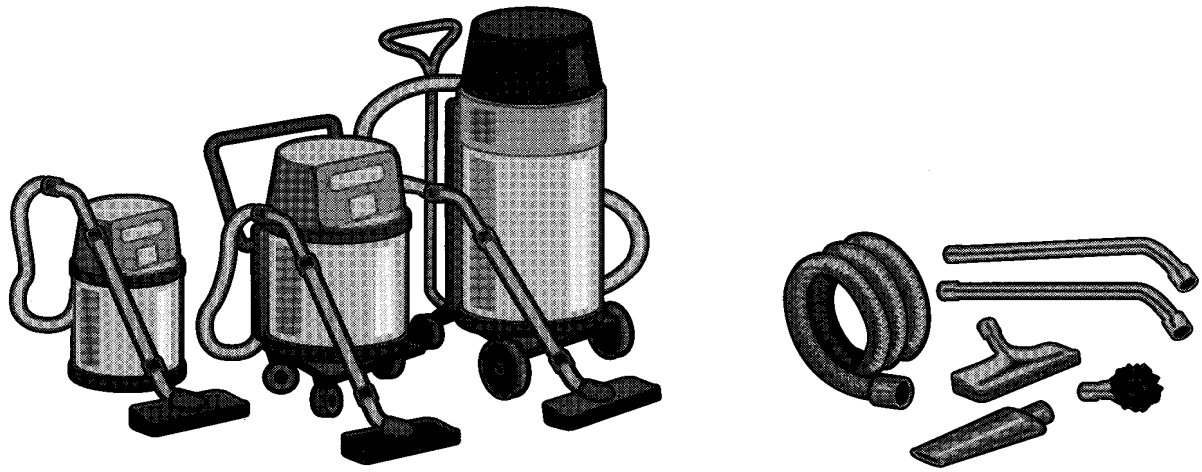
Appropriate Cleaning Equipment

Because a detergent may be used to clean leaded dust from a variety of surfaces, several types of application equipment are needed, including cleaning solution spray bottles, wringer buckets, mops, variously sized hand sponges, brushes, and rags. Using the proper equipment on each surface is essential to the quality of the wet–wash process.

Proper Wet–Cleaning Procedures

At the conclusion of the active lead hazard control process and the initial HEPA vacuuming, all vacuumed surfaces should be thoroughly and completely washed with a high–phosphate solution or other lead–specific cleaning agent (or equivalent) and rinsed. Select a detergent that does not damage existing surface finishes (TSP may damage some finishes). Work should proceed from ceilings to floors and sequenced to avoid passing through rooms already cleaned.

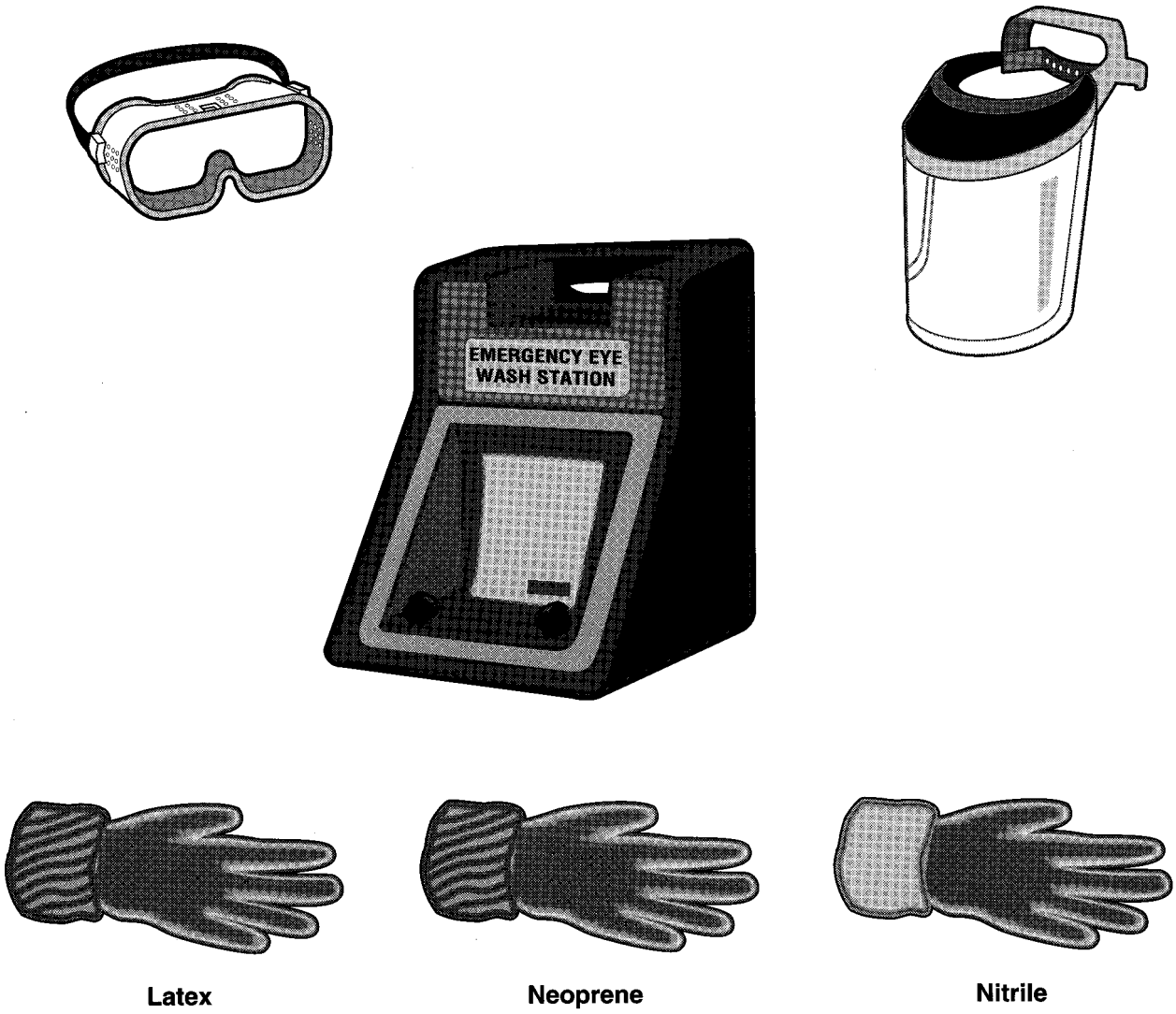
Figure 14.2 HEPA Vacuum Sizes and Tools.



Changing Cleaning Mixture

Many manufacturers of cleaners will indicate the surface area that their cleaning mixture will cover. To avoid recontaminating an area by cleaning it with dirty water, users should follow manufacturer–specified surface–area limits. However, regardless of manufacturers' recommendations, the cleaning mixture should be changed after its use for each room. As a rule of thumb, 5 gallons should be used to clean no more than 1,000 square feet. Used cleaning mixture is potentially hazardous waste (see Chapter 10); consult with your local water and sewage utility for directions on its proper disposal. Wash water should never be poured onto the ground. The wash water is usually filtered and then poured down a toilet (if the local water authority approves).

Figure 14.3 Goggles, Face Shields, Gloves, and Eye Wash Facilities Should Be Available When Used With Chemicals Such as TSP.



3. The HEPA/Wet Wash/HEPA Cycle

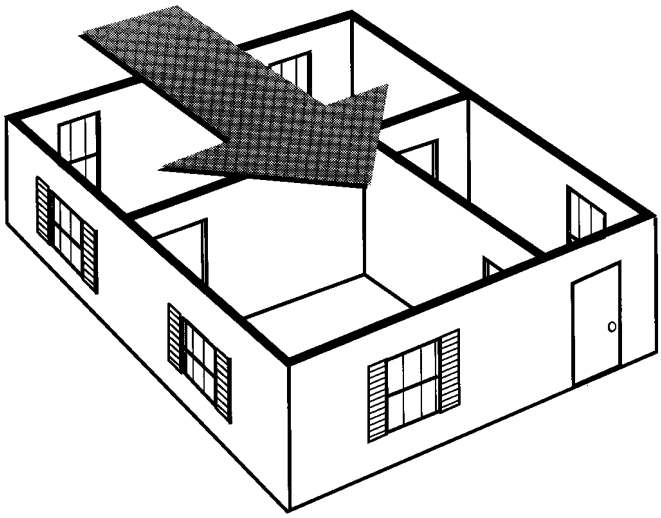
Typical Procedures

The usual cleaning cycle that follows lead hazard control activities is called the HEPA vacuum/wet wash/HEPA cycle and is applied to an entire affected area as follows:

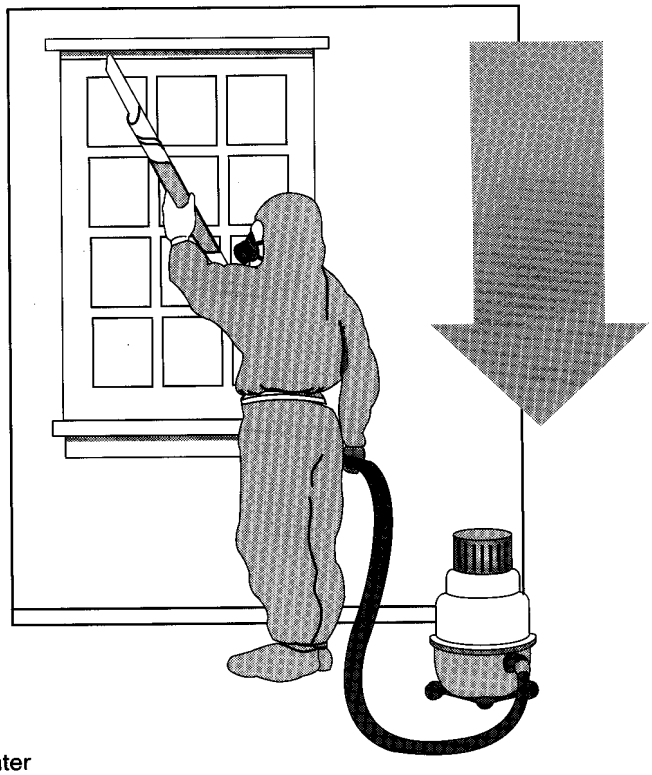
* First, the area is HEPA vacuumed.

Figure 14.4a The HEPA Vacuum, Wet Wash, HEPA Vacuum Cycle Helps in Meeting Clearance Standards.

HEPA vacuum all surfaces
Start at the end farthest from the main entrance/exit. As you vacuum, move towards the main exit and finish there.



Begin at the top of each room and work down. For example, start with the top shelves, the top of the woodwork, and so on, and work down to the floor. Do every inch of the windows, especially the window troughs.



Courtesy: Alice Hamilton Occupational Health Center

* Next, the area is washed down.
* After drying, the area is again HEPA vacuumed.

The rationale for this three–pass system is as follows:

* The first HEPA vacuum removes as much dust and remaining debris as possible.
* The wet wash further dislodges dust from surfaces.
* The final HEPA cycle removes any remaining particles dislodged but not removed by the wet wash.

Single–Pass Wet Wash/HEPA Vacuum

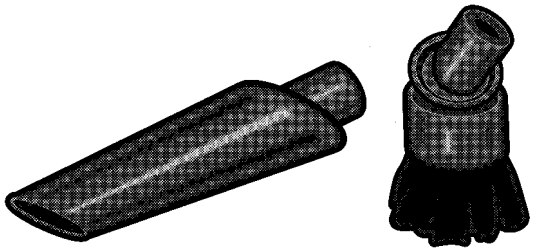
Some lead hazard control contractors have found HEPA spray cleaner vacuums to be a cost–effective alternative to the three–pass system. Similar to home carpet–cleaning machines, these vacuums simultaneously deliver a solution to the surface and recover the dirty solution. Theoretically, this process combines two of the steps in the HEPA vacuum/wet wash/HEPA cycle into one step. While anecdotal evidence indicates that the spray cleaner wet wash/HEPA is effective for some uses, limitations have been noted in its use for ceilings, vertical surfaces, and hard to reach areas. This device may be used as long as clearance standards are met.

Figure 14.4b (continued)

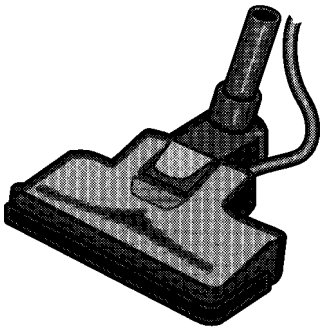
Use special attachments
Use the rubber cone where the floor meets the baseboard and along all the cracks in the floor boards. Use the brush tool for walls and woodwork.

Use the wheeled floor nozzle for bare floors and the carpet beater for rugs.

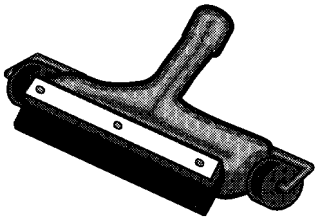
Move slowly
Vacuum slowly so the HEPA vacuum can pick up all the lead dust.



Rubber Cone **Dust Brush**



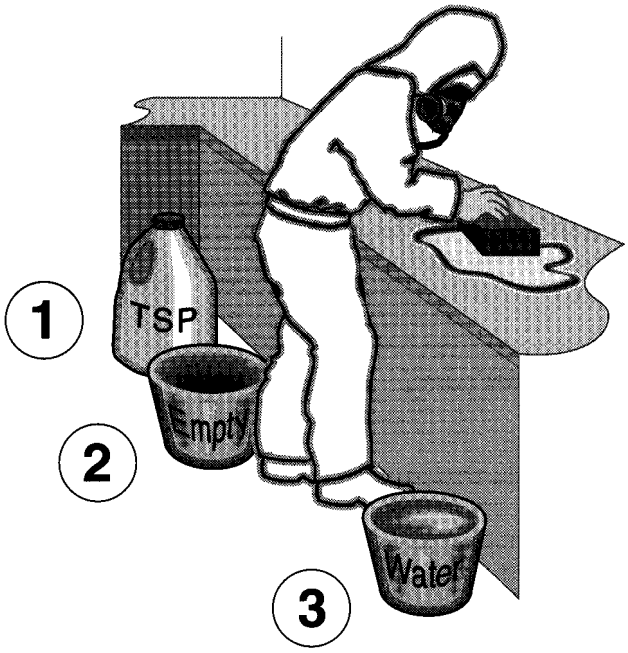
Powered Carpet Beater



Wheeled Floor Nozzle

Figure 14.4c (continued)

Wash all surfaces with suitable detergents
Wash *all surfaces* in the work area with suitable detergents, including areas that had been covered with plastic. Some wallpaper should only be HEPA vacuumed, since it may be damaged by the detergent.



Wipe All Surfaces

Wet Mop Floor

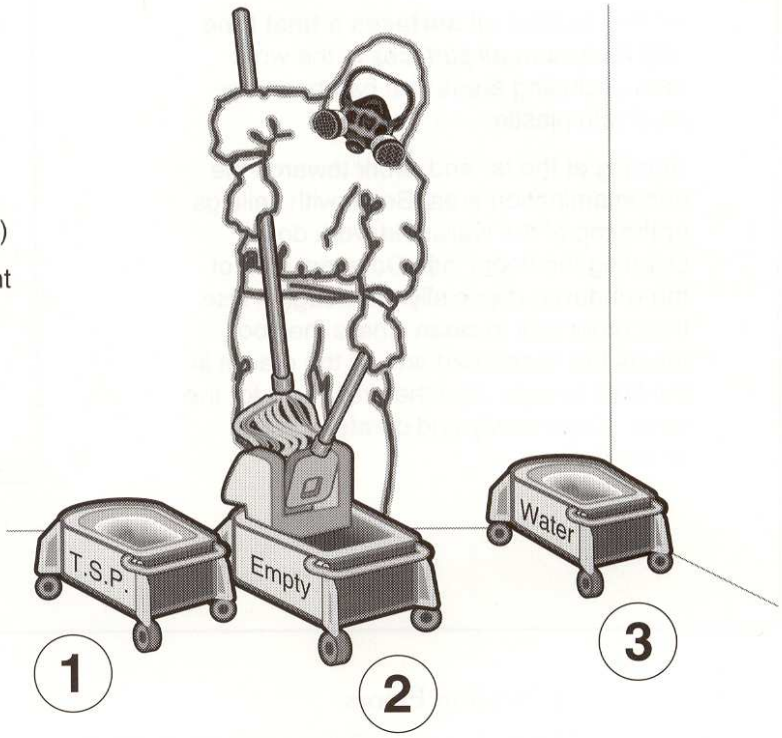
Don't Dry Sweep

Figure 14.4c (continued)

Use the 3-Bucket System.

To wash: Use string mops and mop buckets with wringers. (Some experts say NEVER use a sponge mop on the floor. Sponge mops may only push the lead around on the floor, not remove it.)

Dip the string mophead in the detergent wash in bucket #1. Mop the floor.



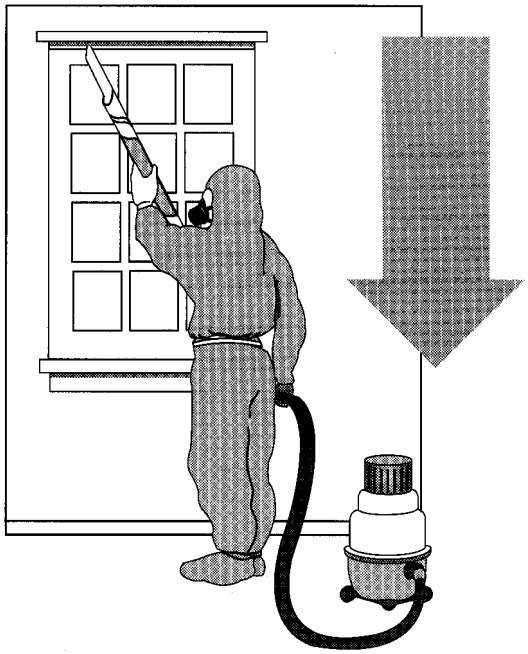
Squeeze out the mophead in empty bucket #2. Return to bucket #1 for more detergent solution and continue mopping. Repeat.

Use the third bucket for rinsing the floor.

Figure 14.4d (continued)

HEPA vacuum all surfaces a final time
HEPA vacuum *all surfaces* in the work area, including areas that had been covered with plastic.

Starting at the far end, work towards the decontamination area. Begin with ceilings or the top of the walls and work down, cleaning the floors last. Do every inch of the windows, especially the troughs. Use the corner tool to clean where the floor meets the baseboard and all the cracks in the floor boards. Use the brush tool for the walls. Move slowly and carefully to get all the dust.



4. Sealing Floors

Before clearance, all floors without an intact, nonporous coating should be coated. Sealed surfaces are easier for residents to clean and maintain over time than those that are not sealed. Wooden floors should be sealed with a clear polyurethane or painted with deck enamel or durable paint. Vinyl tile, linoleum, and other similar floors should be sealed with an appropriate wax. Concrete floors should be sealed with a concrete sealer or other type of concrete deck enamel. However, if these floors are already covered by an effective coat of sealant, it may be possible to skip this step.

As an alternative to sealing, floors may be covered with new vinyl tile, sheet vinyl, linoleum flooring, or the equivalent to create a more permanent cleanable surface. New surfaces should be cleaned with a cleaning solution that is appropriate for that type of surface.

IV. Order of Cleaning Procedures During Lead Hazard Control

The special cleaning procedures to be followed during a lead–based paint hazard control project are discussed in chronological order below. Skipping steps in the process may result in failure to meet post–lead hazard control clearance standards.

A. Precleaning Procedures

Precleaning (i.e., cleaning conducted before lead hazard control is begun) is necessary only in dwelling units that are heavily contaminated with paint chips. Precleaning involves the removal of large debris and paint chips, followed by HEPA vacuuming. These steps may be followed by removal of occupant personal possessions, furniture, or carpeting, depending on the Worksite Preparation Level selected (see Chapter 8). If the furniture will not be cleaned, it should be removed from the area or covered with plastic prior to beginning the precleaning procedure. Carpeting should always be misted before its removal to control the generation of hazardous dust.

It is usually the resident's responsibility to remove most of his or her personal possessions. However, if necessary, owners or project management should be prepared to complete this activity before lead hazard control work begins. As a last resort, the contractor may pack any remaining belongings and carefully seal and move the boxes, supplying all necessary boxes, packing materials, and staff to complete the task. Following cleaning and clearance, the contractor should return all packed items to their appropriate places. Leaving these tasks to the contractor may be expensive and inefficient, since the contractor will need to be insured for this function if the occupant's

belongings are damaged. Additionally, moving furniture, rugs, drapes, and other items owned by the occupant could increase leaded dust levels. Clearance should be conducted after cleaning but before resident items are moved back in.

Figure 14.5 Single-Pass HEPA Vacuum/Wet Wash Technology.

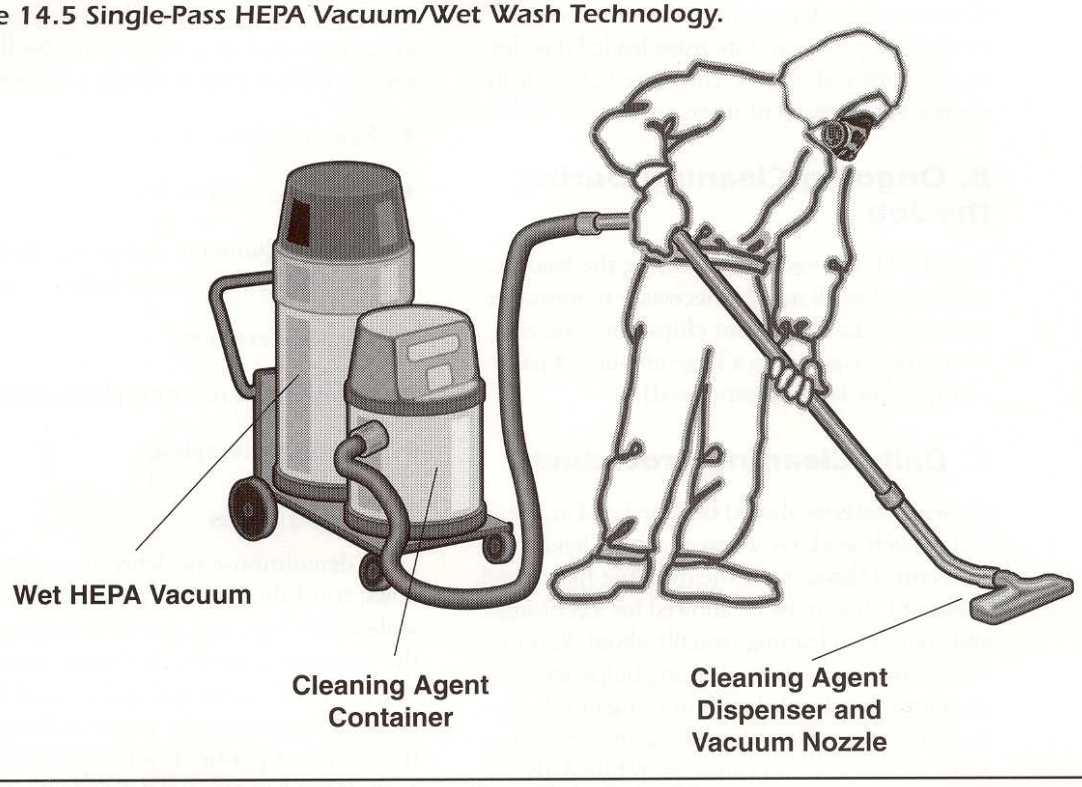


Figure 14.6 Precleaning Is Needed in Areas Where Contamination and Deterioration Are High.

B. Ongoing Cleaning During the Job

Periodic HEPA vacuuming during the lead hazard control work may be necessary to minimize tracking of dust and paint chips from one area to another (e.g., when a large amount of paint chips or dust is being generated).

C. Daily Cleaning Procedures

Cleaning activity should be scheduled at the end of each workday when all active lead hazard control throughout the dwelling has ceased. Sufficient time must be allowed for a thorough and complete cleaning (usually about 30 minutes to an hour). Daily cleaning helps achieve clearance dust levels by minimizing problems that may otherwise occur during final cleaning and limiting worker exposures. While daily cleaning can be skipped in vacant dwelling units, it is required when occupants will return in the evening. Under no circumstances should debris or plastic be left outside overnight in an unsecured area, even if the dwelling is vacant. Daily cleaning should consist of:

* Removing large debris.
* Removing small debris.
* HEPA vacuuming, wet clean, HEPA vacuuming (horizontal surfaces only).
* Cleaning exterior.
* Patching and repairing plastic sheeting.
* Securing debris/plastic.

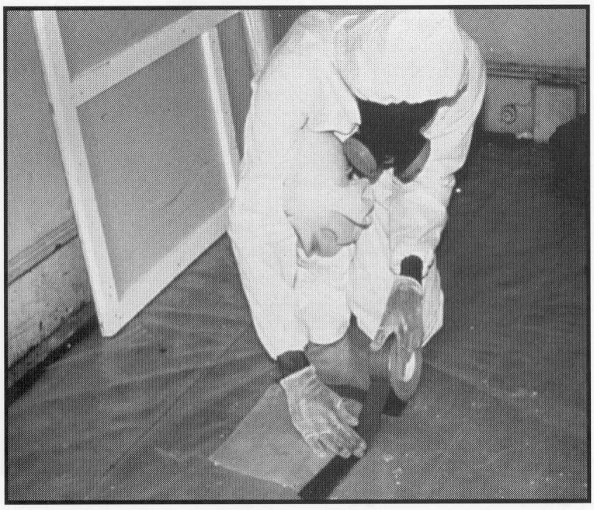


Figure 14.7 Plastic Sheeting Should Be Repaired as Part of Daily Cleanup.

1. Large Debris

Large demolition–type debris (e.g., doors, windows, trim) should be wrapped in 6–mil plastic, sealed with tape, and moved to a secure area on the property designated for waste storage. All sharp corners, edges, and nails should be hammered down to prevent injury and minimize the tearing of plastic. It is not necessary to wrap each individual piece of debris in plastic if the entire load can be wrapped. A secure area either outside or inside the property must be designated as a temporary waste–storage area. Covered, secured, and labeled dumpsters placed on or near the property may be used. Proper segregation of waste should be enforced at this time (see Chapter 10).

2. Small Debris

After being misted with water, small debris should be swept up, collected, and disposed of properly. The swept debris should be placed in double 4–mil or single 6–mil polyethylene (or equivalent) plastic bags, properly sealed, and moved to the designated trash storage area. Trash bags should not be overloaded; overloaded bags may rupture or puncture during handling and transport.

3. Exterior Cleaning

Areas potentially affected by exterior lead hazard control should be protected via a containment system (see Chapter 8). Because weather can adversely affect the efficacy of exterior containment, the surface plastic of the containment system should be removed at the end of each workday. On a daily basis, as well as during final cleaning, the immediate area should be examined visually to ensure that no debris has escaped containment. Any such debris should be raked or vacuumed and placed in single 6–mil or double 4–mil plastic bags, which should then be sealed and stored along with other contaminated debris. HEPA vacuuming is appropriate for hard exterior surfaces, not soil.

4. Worker Protection Measures

General worker protection measures are discussed in Chapter 9. Studies indicate that during daily cleaning activities, especially while wet sweeping, workers may be exposed to high levels of airborne dust. Therefore, workers should wear protective clothing and equipment, especially appropriate respirators.

5. Maintaining Containment

The integrity of the plastic sheeting used in a lead hazard control project must be maintained. During their daily cleaning activities, workers should monitor the sheeting and immediately repair any holes or rips with 6–mil plastic and duct tape.

V. Order of Final Cleaning Procedures After Lead Hazard Control

Before treated surfaces can be painted or sealed, final cleaning procedures must be completed. Because airborne dust requires time to settle, the final cleaning process should start no sooner than 1 hour after active lead hazard control has ceased in the room. See Appendix 11 for details regarding dust settling.

A. Final Cleaning

As the first stage in the final cleaning, floor plastic should be misted and swept as detailed earlier in this chapter. Upper–level plastic, such as that on cabinets and counters, should be removed first, after it has been misted with water *and cleaned*. All plastic should be folded carefully from the corners/ends to the middle to trap any remaining dust. Next, remove both layers of plastic from the floor.

Plastic sheets used to isolate contaminated rooms from non–contaminated rooms should remain in place until after the cleaning and removal of other plastic

sheeting; these sheets may then be misted, cleaned, and removed last.

Removed plastic should be placed into double 4–mil or single 6–mil plastic bags, or plastic bags with equivalent (or better) performance characteristics, which are sealed and removed from the premises. As with daily cleanings, this plastic removal process usually requires workers to use protective clothing and respirators.

After the plastic has been removed from the contaminated area, the entire area should be cleaned using the HEPA/wet wash/HEPA cycle, starting with the ceiling and working down to the floor. After surfaces are repainted or sealed, a final HEPA/wet wash/HEPA cycle may be necessary if accumulated dust caused by other work is visible.

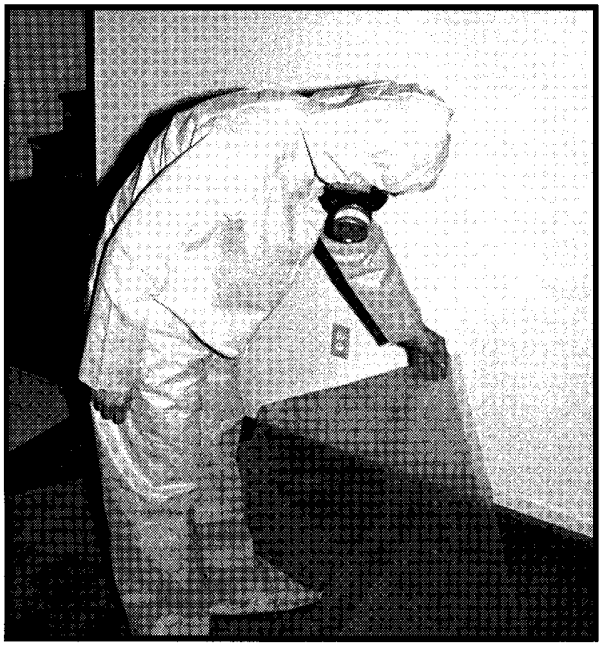


Figure 14.8a Pick Up Corners of Plastic Sheeting.

Figure 14.8b Fold Plastic Inward.

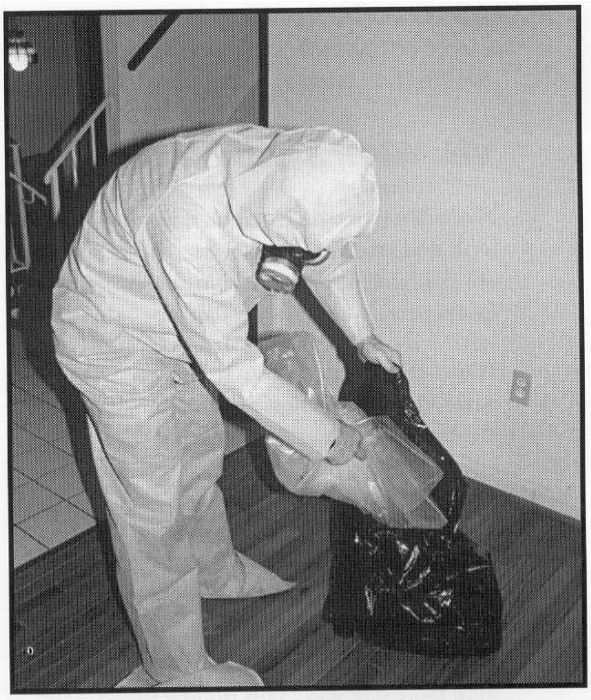


Figure 14.8c Dispose of Plastic Sheeting in a Plastic Trash Bag.

1. Decontamination of Workers, Supplies, and Equipment

Decontamination is necessary to ensure that worker's families, other workers, and subsequent properties do not become contaminated. Specific procedures for proper decontamination of equipment, tools, and materials prior to their removal from lead hazard control containment areas should be implemented, as described below and in Chapters 9 and 10.

Work clothing, work shoes, and tools should not be placed in a worker's automobile unless they have been laundered or placed in sealed bags. All vacuums and tools that were used should be wiped down using sponges or rags with detergent solutions.

Consumable/disposable supplies, such as mop heads, sponges, and rags, should be replaced, after each dwelling is completed. Soiled items should be treated as contaminated debris (see Chapter 10).

Durable equipment, such as power and hand tools, generators, and vehicles, should be cleaned prior to their removal from the site; the cleaning should consist of a thorough HEPA vacuuming followed by washing.

B. Preliminary Visual Examination

After the preliminary final cleaning effort is completed, the certified supervisor should visually evaluate the entire work area to ensure that all work has been completed and all visible dust and debris have been removed. While the preliminary examination may be performed by the lead hazard control supervisor, contractor, or owner as a preparatory step before the final clearance examination, it does not replace the independent visual assessment conducted during clearance.

If the visual examination results are unsatisfactory, affected surfaces must be retreated and/or recleaned. Therefore, it is more cost effective to have the supervisor rather than the clearance examiner perform this initial examination.

C. Surface Painting or Sealing of Nonfloor Surfaces

The next step of the cleaning process is painting or otherwise sealing all treated surfaces except floors.

Surfaces, including walls, ceilings, and woodwork, should be coated with an appropriate primer and repainted. Surfaces enclosed with vinyl, aluminum coil stock, and other materials traditionally not repainted are exempt from the painting provision.

D. Final Inspection

The final clearance evaluation should take place at least 1 hour after the final cleaning. Clearance has three purposes: 1) to ensure that the lead hazard control work is complete, 2) to detect the presence of leaded dust, and 3) to make sure that all treated surfaces have been repainted or otherwise sealed. Clearance is usually performed after the sealant is applied to the floor. See Chapter 15 for information on clearance examination procedures.

E. Recleaning After Clearance Failure

If after passing the final visual examination, the dwelling unit fails the clearance wipe dust tests, the HEPA/wet wash/HEPA cleaning cycle should be carefully and methodically repeated. Failure is an indication that the cleaning has not been successful. Recleaning should be conducted under the direct supervision of a certified supervisor. Care should be exercised during the recleaning of "failed" surfaces or components to avoid recontaminating "cleared" surfaces or components.

VI. Cleaning Cost Considerations

An important consideration in determining lead hazard control strategies and methods is the cost and difficulty of required daily and final cleanup operations and the ease with which one can meet dust–clearance standards. A general rule of thumb is that lead hazard control strategies that generate the most dust will have higher cleanup costs and higher initial clearance test–failure rates.

A. Initial Clearance Test Failure Rates

The likelihood of passing final dust–clearance tests is highly correlated with the chosen intervention strategy, methods, and care exercised by the contractor. For example, in one study (HUD, 1991) initial wipe–test failure rates were 14 percent for interior window sills, 19 percent for floors, and 33 percent for window troughs. The pass/fail rates for each surface were strongly associated with the dwelling unit abatement strategy employed. Chemical removal and hand–scraping strategies experienced higher failure rates than replacement and encapsulation/ enclosure strategies (see Table 14.1).

However, results of the HUD demonstration project indicated that clearance failure is not solely related to abatement method. The report stated that "the

diligence and effectiveness of an abatement contractor's cleaning process ... had a major impact on ... the likelihood of the dwelling unit to pass the final wipe test clearance" (HUD, 1991).

B. Key Factors In Effective Cleaning

Effective cleaning will be aided by adequate sealing of surfaces with polyethylene sheeting prior to lead hazard control, proper daily cleaning practices, good worker training, and attention to detail. Where poor worksite preparation is employed, additional cleaning may be required to meet clearance.

C. Special Problems

Surfaces such as porous concrete, old porous hardwood floors, and areas such as corners of rooms and window troughs pose especially difficult cleaning challenges. Porous concrete and corners of rooms normally require additional vacuuming to achieve an acceptable level of cleanliness.

The lead hazard control strategy of enclosure is frequently chosen for window troughs and for old porous hardwood floors due to the difficulty of adequately cleaning these surfaces. This option provides not only a clean surface but a more permanently cleanable surface for dwelling occupants to maintain.

VII. Alternative Methods

Alternatives to the recommended cleaning tools and practices discussed in this chapter are available, some having significant potential for increasing effectiveness and lowering costs.

A recent Canadian study (CMHC, 1992) evaluated the effectiveness of contaminated dust cleanup activities using tools that would generally be available to construction contractors and homeowners. Vinyl flooring and carpeting were cleaned using several wet/dry vacuuming systems, sweeping, and wet mopping. The study found that regular vacuums with empty bags send a steady stream of fine particles into the air, while vacuums with partially filled bags were more efficient. This finding suggests the necessity for HEPA vacuums. Other vacuums may be used if workers do not experience increased exposures, if compliance with clearance standards is achieved, and if a variance from OSHA regulation (29 CFR 1926.62 (h)(4)) is obtained by the contractor or employer (if required).

Agitator heads on vacuums were demonstrated to significantly enhance vacuum effectiveness on carpets in cleaning up fine dust without increasing airborne dust levels. Table 14.2 suggests that a central vacuum with an agitator head is most efficient at removing dust and minimizing recontamination, probably because the vacuum exhaust is blown away from living areas. Because many houses do not have central vacuuming systems, a portable HEPA vacuum is the next best choice (see Table 14.2). Vacuums without agitator heads appeared to perform relatively poorly on carpets.

A. Vacuums

Regular (non–HEPA) dry vacuums potentially produce hazardous levels of airborne dust and therefore should be avoided. Externally exhausted vacuum units with adequate dust retaining capability may be used. The OSHA lead standard requires the use of HEPA vacuum equipment (see 29 CFR 1926.62 (h)(4), which states, "where vacuuming methods are selected, the vacuums shall be equipped with HEPA filters").

B. Trisodium Phosphate and Other Detergents

TSP detergents have been used successfully for a number of years in lead hazard control work. However, in recent years, other new cleaning agents have been developed specifically for leaded dust removal. The need for alternatives has been fueled by the fact that TSP is an eye and skin irritant and is increasingly restricted from household use and unavailable in many local jurisdictions. TSP also damages some finishes. Recently reported trials of two new products suggest that alternative lead–specific cleaning agents may be more effective and safer than TSP (Grawe, 1993; Wilson, 1993).

Table 14.1
Initial Cleaning Wipe–Test Failure Rates for Various Abatement Strategies

Dust Test Location	Hand Scrape w/Heat Gun	Chemical Removal	Enclosure	Encapsulation	Replacement	All Methods
Floors	28.8%	22.7%	20.0%	13.8%	12.5%	19%
Sills	24.4%	24.1%	8.2%	4.8%	17.4%	14%
Wells	44.5%	45.7%	23.7%	25.7%	21.0%	33%

Source: U.S. Department of Housing and Urban Development (August 1991) The HUD Lead–Based Paint Abatement Demonstration (FHA)

These *Guidelines* do not prohibit the use of non–TSP cleaning agents. HUD encourages further evaluation of alternative cleaning methods. Use of any cleaning agent that results in compliance with clearance criteria is encouraged.

Table 14.2
Mass Removal Efficiency for Extended Vacuuming Cycles

Cycle Number	Mass Removal Efficiency Percentages			
	Cleaning Method			
	Central Vacuum—Plain Tool	Central Vacuum—Agitator Head	HEPA Vacuum	Portable Vacuum — Plain Tool
1	34.7	71.0	55.4	17.5
2	47.0	80.2	61.2	23.0
3	51.9	85.9	66.3	26.6
4	56.0	87.8	67.0	29.4
5	59.3	88.9	72.1	32.5
6	61.6	91.2	74.4	34.9
7	63.8	93.1	76.4	36.5
8	67.5	95.4	77.5	38.1
9	67.5	97.7	78.7	40.1
10	67.2	100.0	80.2	41.7
11		102.3	80.2	41.7
12		104.6	84.1	44.8
13		104.6	84.5	46.8
14		103.8	84.5	48.4
15				49.6
16				50.8
17				52.4
18				53.6
19				54.4
20				55.2

Source: Canada Mortgage and Housing Corporation: Saskatchewan Research Council (December 1992) Effectiveness of Clean–up Techniques for Leaded Paint Dust