

**LEAD-BASED PAINT  
OPERATIONS AND MAINTENANCE  
PROGRAM**

**DAVENPORT MAIN POST OFFICE  
1 SOUTH BOULEVARD EAST  
DAVENPORT, FLORIDA 33836**



*PREPARED FOR:*



**United States Postal Service  
Suncoast District  
P.O. Box 22810  
Tampa, FL 33622-2810  
Project No. H92131**

*PREPARED BY:*

***ECT***

***Environmental Consulting & Technology, Inc.***

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990259-0022-1200**

**August 1999**

**United States Postal Service  
Davenport Main Post Office  
Davenport, Florida**

**Lead Based Paint  
Operations  
And  
Maintenance  
Program**

# Purpose of the Manual

**Objectives** - This Manual is written to guide users in the safe management of lead-based paint, commonly encountered during the operation and maintenance (O&M) of buildings. These procedures will help the user to: (1) control the creation of lead-contaminated dust, (2) control the scattering (dispersion) of this dust, (3) effectively clean up lead-contaminated dust and debris created by the work being done, and (4) protect the worker's health and safety.

**Manual Users** - This Manual provides maintenance guidance to employees of the United States Postal Service. Operations and Maintenance (O&M) work in these types of buildings may be performed by in-house staff or contracted to outside businesses. The Manual assumes that these maintenance workers are experienced and fully trained in their respective maintenance trades and in performing O&M work.

**Definition:** The term "operations and maintenance" is to describe the routine work necessary to operate and maintain a building whether or not lead-based paint is present.

The Manual has taken everyday O&M activities for all types of buildings and modified them for situations where lead-based paint may present hazards. These activities will help protect O&M workers, and building occupants from lead hazards. They will also help prevent contamination of the environment from the resulting dust and debris.

The O&M activities are described in such a way that a user can select the ones most closely resembling the work to be done. They can be modified, as explained in *Chapters 2 and 3*, for work that is similar to, but not exactly like, that described.

## **Written LBP O&M Plan Davenport Main Main**

This lead-based paint operations and maintenance program has been prepared to provide guidance for the United States Postal Service, Davenport Main Post Office. It includes specific work practices to be followed when working on surfaces containing lead-based paint.

Environmental Consulting & Technology, Inc. (ECT) has surveyed the painted surfaces at the Davenport Main Post Office facility for lead-based paint. The survey results are attached to this O&M program.

Lead-based paint has been identified at the following locations:

- The yellow caution paint on the lift; and
- The yellow caution paint on the bumper pole.

Work Practices and General Work Procedures have been designed to minimize the creation of dust during maintenance activities on lead-painted surfaces. These work practices are provided as a section of this document.

## Assessment of Lead Hazard

**Lead-Based Paint Health Effects and Hazards** - Health research has revealed that lead, when swallowed or inhaled, can be harmful to human beings. It can be especially harmful to small children, pregnant women, men and women during their reproductive years, and people with hypertension. Excessive levels of lead in the blood may cause serious damage to the brain and central nervous system. High blood lead levels in adults may increase blood pressure and decrease learning ability, hearing, coordination and formation of blood cells. High blood lead can also damage kidneys and digestive systems and can injure reproductive organs. Lead poisoning in children may result in learning disabilities, including attention deficit disorder and hyperactivity, loss of hearing, mental retardation, and even death.

The lead hazards in buildings come primarily from the past use of lead-based paint. *The mere presence of lead-based paint, however, does not constitute a hazard.* The risk of adverse human health effects depends on the paint's location and condition and on the way occupants use the building. If circumstances are such that people, especially children, may inhale or ingest lead, then a hazard is present. Public Law 102-550 (Federal "Title X") defines lead-based paint hazard as "any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as established by the appropriate federal agency."

Buildings built prior to 1978 have a higher likelihood of containing lead-based paint than those constructed after 1978. If the lead-based paint is in poor condition, hazards from dust and debris are more likely. Abrasive action on lead painted surfaces can create lead-contaminated dust in a building.

**Testing for Lead-Based Paint** - The painted surfaces in this facility have been tested utilizing a Niton® 309 X-Ray Fluorescence (XRF) detector, see the Asbestos Containing Materials, Lead Based Paint, and Lead in Drinking Water Survey and Assessment Report. A summary table of the lead based paint results is contained in Table 2-1. The guidance in the Manual should be used when working on these surfaces identified as lead based paint.

## Decisions Regarding O&M Work

**Worker Experience** - The Manual assumes that the user knows how to do the work task involved. For example, if the work that needs to be done is repairing wall plaster, then the Manual relies on the user to know how to plaster. The Manual guides the user in ways to reduce the hazards from lead-based paint while plastering. Some of the special procedures require knowledge in addition to knowing how to plaster. The Manual assumes that the user understands how to do these special procedures through training or by experience. The Manual also assumes that the user has read and understands the instructions provided by manufacturers of special equipment suggested for use around lead hazards.

In addition, federal law requires specific training for employees who work with lead-based paint. Training responsibilities mandated by the Occupational Safety and Health Administration (OSHA) are summarized and discussed in *Chapter 5, Regulations, and Guidelines Governing Lead-Based Paint*.

The United States Environmental Protection Agency (EPA) has issued training regulations for workers exposed to lead-based paint. These are discussed in *Chapter 5* and outlined in *Appendix B*.

A training outline, prepared by the Society for Occupational and Environmental Health, which outlines training topics at four recommended levels (awareness, custodial, maintenance, and abatement) is also included in *Appendix B*.

**Equipment** - Equipment and supplies necessary to perform O&M activities on lead-based paint are generally available. They consist of cleaning supplies such as cloths, mops and buckets, misting or spray bottles, clean water, tape, and plastic drop cloths. Also useful as a precautionary measure during routine cleaning, are household vacuum cleaners equipped with improved efficiency vacuum cleaner bags. These disposable bags can be purchased at vacuum cleaner retail and supply outlets. No scientific data currently exist to verify manufacturer's advertising claims for these vacuum cleaner bags.

High efficiency particulate air (HEPA) filter equipped vacuum cleaners are necessary if vacuuming will be done during or after procedures that create dust and debris. These machines, which are considerably more expensive than household vacuums, will capture very small particles. They are very effective in protecting users, occupants, and the environment.

**Personal Protection** - Personal hygiene is very important when conducting lead-based paint O&M activities. Thorough face and hand washing should accompany any activity that disturbs the paint. Eating, drinking, and smoking should never be allowed in the work area.

To limit exposure to lead-based paint dust, protective clothing such as disposable coveralls, gloves, and boots should be worn. When conducting projects that create significant airborne dust, half-face air purifying respirators equipped with high-efficiency particulate air (HEPA) filters are recommended and are required by OSHA when airborne exposures of lead reach a certain level.

**Regulations and Lead O&M Work** - Federal regulations are summarized in *Chapter 5, Regulations, and Guidelines Governing Lead-Based Paint*. It is important for users of the Manual also to review local and state regulations. When there is more than one regulation governing lead-based paintwork, the most stringent requirements from each regulation must be followed.

**Section 2.0 O&M Program:**

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# O&M Program

This written O&M program should be kept in an accessible location at the facility. It describes how the building management and workers will minimize lead exposures while performing normal operations and maintenance procedures. The basic contents of a written O&M program are:

**1. Designated Person** - One person should be designated to manage the lead-based paint O&M program. This person should be trained in lead hazards and in specific requirements for operations and maintenance activities around lead-painted surfaces. The designated person's name, title, and phone number should be listed in the O&M program.

**2. Survey Results** - The Asbestos-Containing Materials, Lead Based Paint, and Lead in Drinking Water Survey and Assessment report is considered as part of the O&M program. This report contains the X-Ray Fluorescence (XRF) report and field notes. LBP surfaces should be visually inspected periodically depending on conditions. This section should be updated when additional lead surveys are performed. Table 2-1 summarizes the XRF results of the lead-based paint survey

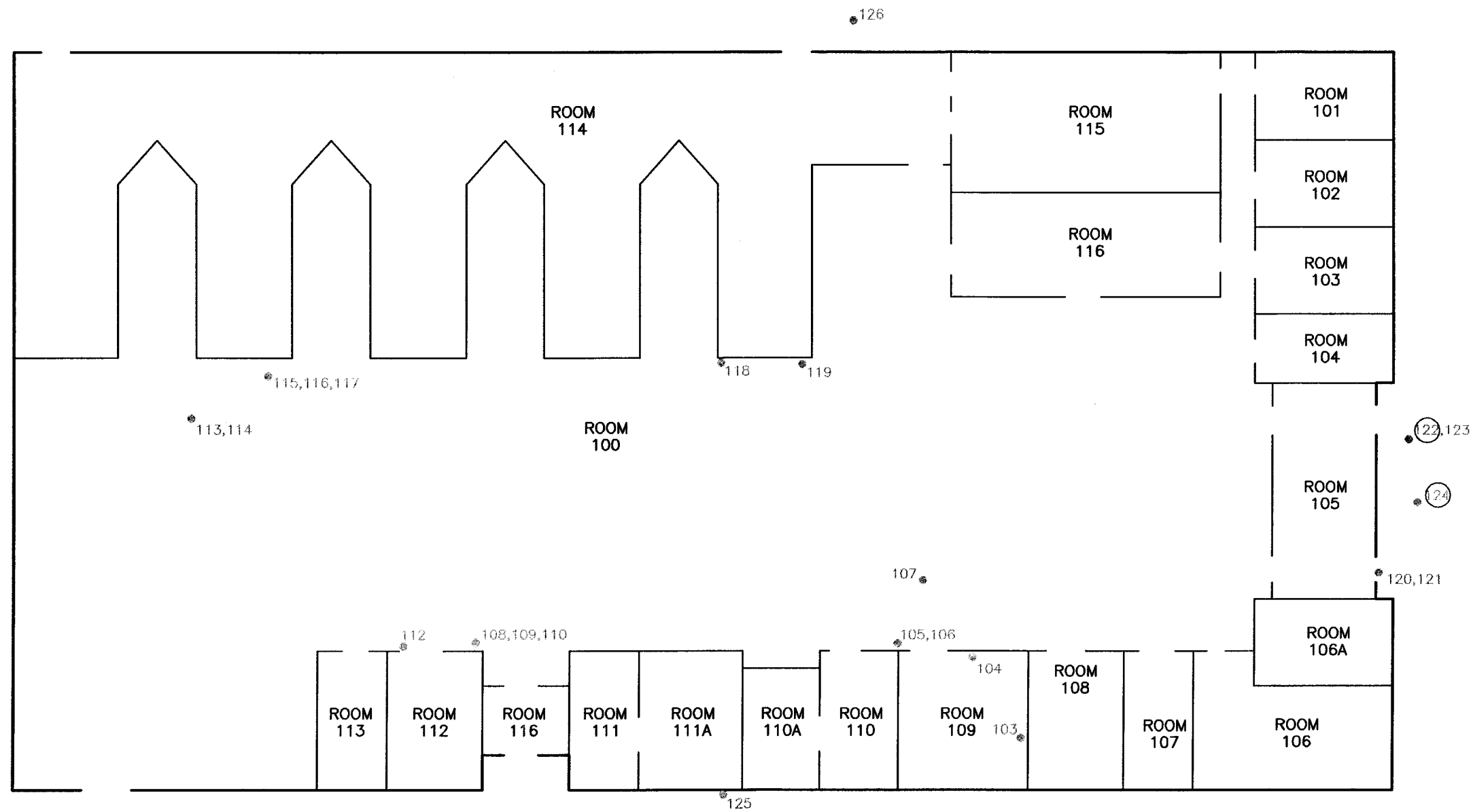
**4. Location of Lead-Based Paint** - The survey report provides descriptions of the location of lead-based paint located at this facility. The location of LBP should be updated as new survey results are obtained and when LBP is removed. Figure 2-1 shows sample locations and indicates positive results in red.

- The yellow caution paint on the lift; and
- The yellow caution paint on the bumper pole.

**5. Training** - All worker training must comply with federal, state and local requirements and should be documented as an addendum to the O&M program. Documentation requires placing copies of training certificates, class rosters, and course outlines in a section of the program file. The section should be updated as additional training is completed.

## Selecting Work Practices

*Chapter 4* contains work practices designed to minimize and contain lead-contaminated dust and debris while performing O&M activities. These work practices should be used any time work activities will disturb a lead-painted surface or a surface assumed to contain lead.



**LEGEND**

- 107 ● LEAD-BASED PAINT SAMPLE LOCATION & IDENTIFICATION NEGATIVE FOR LBP
- LEAD-BASED PAINT SAMPLE LOCATION & IDENTIFICATION POSITIVE FOR LBP

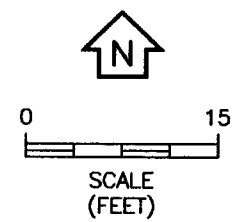


FIGURE 2-1.  
 LEAD-BASED PAINT SAMPLE LOCATION MAP  
 DAVENPORT MAIN POST OFFICE  
 1 SOUTH BOULEVARD EAST  
 DAVENPORT, POLK COUNTY, FLORIDA  
 Sources: Weston, 1995; ECT, 1999.

TABLE 2-1. LEAD-BASED PAINT SURVEY AND ASSESSMENT FORM

Facility Name: Davenport Main Post Office  
 Survey Date: June 23, 1999  
 Contract No: 123125-97-J-3070

Consultant: ECT  
 USPS Work Order No.: 29.00  
 USPS Project No.: H92131

Sample Number	Location	Building Component	Substrate Material	Observed Paint Color (from top to bottom)	Condition	XRF Results (mg/cm <sup>2</sup> )
101	Calibration					
102	Calibration					
103	Room 109 (swing room)	Wall	Concrete	Beige	Good	0.02
104	Room 109 (swing room)	Wall	Concrete	Beige	Good	0.01
105	Room 100 (work area)	Wall	Concrete	Beige	Good	0.02
106	Room 100 (work area)	Wall	Concrete	White	Good	0.00
107	Room 100 (work area)	Wall	Wall board	Grey	Good	0.00
108	Room 100 (work area)	Wall	Concrete	Red	Good	0.01
109	Room 100 (work area)	Wall	Concrete	Beige	Good	0.00
110	Room 100 (work area)	Wall	Concrete	White	Good	0.00
111	Room 100 (work area)	Door frame	Metal	Black	Good	0.01
112	Room 100 (work area)	Door frame	Metal	Black	Good	0.02
113	Room 100 (work area)	Pillar	Metal	Beige	Good	0.00
114	Room 100 (work area)	Pillar	Metal	White	Good	0.00
115	Room 100 (work area)	Wall	Wall board	White	Good	0.00
116	Room 100 (work area)	Wall	Wall board	White	Good	0.01
117	Room 100 (work area)	Wall	Wall board	Beige	Good	0.02
118	Room 100 (work area)	Mail box	Wood	Black	Good	0.00
119	Room 100 (work area)	Floor	Planking	Grey	Fair	0.00
120	Exterior	Door	Metal	Black	Fair	0.00
121	Exterior	Door frame	Metal	Black	Fair	0.02
122	Exterior	Lift	Metal	Yellow	Poor	1.36
123	Exterior	Lift	Metal	Green	Good	0.00
124	Exterior	Bumper pole	Concrete	Yellow	Good	2.31
125	Exterior	Ceiling	Concrete	White	Good	0.02
126	Exterior	Wall	Concrete	White	Good	0.00

Source: ECT, 1999.

Several decisions must be made before beginning an O&M activity that will disturb LBP. The first step is to determine the proper work practice. The second, and most important step, is to determine the appropriate work practice level for performing the task. The next step is to study the actual performance instructions to ensure that they are sufficient to complete the specific task at hand without modification. The final step is to validate, if possible, whether earlier use of the selected work practice was successful and to change the work practice level or select a different work practice, if the one selected was unsuccessful.

**Selecting Work Practice** - The designated person should review the *Work Practice Summary in Chapter 4* to select the work practice most resembling the task to be performed.

**Determining Level of Work Practice** - The designated person should next review the Examples for all Levels described in the work practice. The scope of the task, how long the work will continue, and especially the condition of the LBP and substrate to be disturbed must be considered. If there is any question regarding the condition of LBP, the work area should be reevaluated prior to determining the work practice level.

**Modifications to Work Practices** - Complex activities not specifically described in the work practices can usually be performed by modifying and combining various parts of several different work practices.

**Validation** - The designated person should review the results of previous use of any work practices being assigned. Any air monitoring results associated with the work practice should be carefully reviewed. Failure, especially repeated failure, of visual or clearance testing should be considered when determining or changing the work practice level or the work practice itself.

## **O&M Program Management**

**Scheduling** - O&M work activities disturbing lead-based painted surfaces should be scheduled through the designated person.

A major scheduling issue has to do with the need to relocate building occupants. Ideally, work areas should be vacant while LBP O&M work is taking place. **Access** and **Containment** are significant segments of the "Preparation" General Work Procedures. An effort should be made to schedule Level 3 work practices during tenant turnover.

**Notification of Occupants** - Building occupants should be informed of the presence of lead-based paint and hazards associated with it. *Appendix D* is a sample letter that may be used for this purpose. Occupants should understand the importance both of not disturbing lead-based paint and of reporting the presence of chipping/flaking paint or visible dust and debris.

Occupants should be notified prior to the start of lead-based paint O&M work affecting areas they use. Occupants should receive advanced notice when relocation will be necessary.

**Training** - The work practices are intended to minimize lead exposure both to workers and to buildings' occupants. Workers should not undertake any of these tasks, however, without having a basic understanding of the hazards of lead, the measures needed to protect themselves and others from lead exposure, and at least the minimum training required by law. *Chapter 5* describes OSHA training requirements and EPA regulations for lead abatement workers. In addition, state and local regulations should be consulted. *Appendix B* of this Manual is a suggested training outline developed by the Society for Occupational and Environmental Health (SOEH). It proposes four levels of training; awareness, custodial, maintenance, and abatement. Awareness training should be provided to all O&M personnel regardless of the level of the task performed.

The designated person should ensure that all O&M workers have received proper and required LBP training.

### ***Cleaning other LBP surfaces:***

#### **Recommended:**

- non-abrasive cloths and mild detergents

#### **Avoid:**

- granular cleaners and scouring pads
- solvent cleaners that may dissolve the paint
- excessive rubbing of spots to remove them

**Recordkeeping** - Records should be maintained that document employee records of workers assigned to specific lead-based paint O&M work. This includes O&M worker training and lead-based paint hazard awareness training. Certain records, such as air monitoring data and medical surveillance results, must be kept by the employer for specified periods of time, and these records should be maintained as outlined in the OSHA Lead Standards (*see Chapter 5*).

Waste manifests, if covered by regulation, must be kept for three years.

## **Waste Disposal**

Waste generated during O&M work may be regulated as hazardous waste under the Resource Conservation and Recovery Act (RCRA) and under state and/or local regulations. Hazardous waste requirements under RCRA and state/local regulations describe the procedures necessary to ensure that waste handling and disposal will not adversely impact the environment. Lead-based paint containing waste generated during O&M (or construction) operations are subject to RCRA requirements if they produce 220 pounds or more of such waste in a month, or store 2200 pounds or more of it at a single site.

**Section 3.0 General Procedures**

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# Work Practice Structure

Three general procedures are described in this Chapter. Seven work practices are described in *Chapter 4*. The work practices and general procedures were designed to be used hand-in-hand. Both were structured around the three levels of dust generation defined below. As the expected level of lead-contaminated dust generation increases, so does the level of precaution used to prepare and clean up work areas and to protect workers and occupants during performance of the work practice.

**General Procedures** - Performance of one of the 5 work practices also requires use of one of the three general procedures. In other words, the general procedures are necessary no matter which work practice is being performed. "Icon" symbols were also developed to represent six parts of the general procedure structure. The format for the general procedures includes the following parts:

## *Tools & Supplies*

*Preparation* of Work Area involving

**Personal Protection**



**Dust Control** measures



**Access**



*Clean-up* of Work Area involving

**Clean Work Surfaces**  
**Clean Dust Control Surfaces**



**Worker Hygiene**



**Disposal.**



## Work Practice Levels

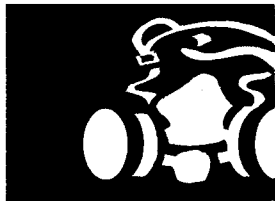
The work practice guidance in the Manual is structured around three levels of anticipated dust generation. The definitions of the three levels are as follows:



**Level 1** A negligible amount of lead-contaminated dust may be generated, requiring a minimal amount of preparation and worker protection. Negligible may be non-visible or barely visible and localized.



**Level 2** A moderate amount of lead-contaminated dust and debris will be generated or disturbed, but neither the quantities nor the duration of effort warrants full-scale work area preparation and worker protection. A moderate amount is clearly visible, may contain debris and paint chips, but will not spread beyond a small area drop cloth to any other surface in the room.



**Level 3** Lead-contaminated dust and debris will be generated or disturbed in sufficient quantities and for enough time to warrant full-scale work area preparation and worker protection. A significant amount is an amount that cannot be contained simply by the use of a small area drop cloth.

The symbols shown with the level definitions above are called “icons.” The Manual incorporates these icon symbols to define the level of guidance.

The Level 1 “icon” represents a loose plastic drop cloth. The Level 2 symbol is a protective foot covering referred to as a “bootie.” The Level 3 “icon” represents a respirator.



# General Procedures Level 1

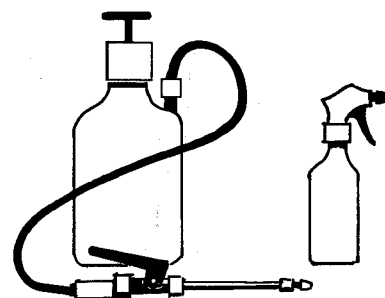
Work Practices using Level 1 General Procedures are those activities requiring a minimal amount of preparation and worker protection because a negligible amount of lead dust may be generated or disturbed. This amount of lead dust may be non-visible or barely visible and localized. However, small paint particles, chips and debris may result from any disturbance of a painted surface. These preparation and cleanup procedures were designed to protect workers and work areas from lead-based paint dust and debris and to aid in the cleaning of any dust or debris created as a result of the work practice.

The following is a list of tools, equipment and supplies that are referenced in the work practices and are recommended to perform the work practices. For frequent O&M work, it might be helpful to maintain an "O&M cart" containing the necessary tools, equipment and materials.

**Tools**  Garden sprayer or mister

**Supplies**

- Plastic drop cloth
- Bucket with clean water
- Sponges
- Detergent
- Clean cloths
- Paper towels
- Plastic disposal bags
- Duct tape



## **Personal Protective Equipment**

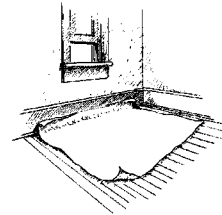
- Disposable gloves
- Safety glasses

# Preparation Level 1



## **Dust Control**

Place a plastic drop cloth on the floor under the immediate work area. The drop cloth should be large enough to catch any lead dust released.



It is preferable, but not essential, to secure the drop cloth to adjacent walls.



## **Access**

No one should be allowed on the drop cloth who is not involved in performing the work.



## **Personal Protection**

The primary objective is to work as cleanly as possible. If any dust or debris gets off the drop cloth, the work should immediately be upgraded to Level 2.

**Proceed to Work Practice Instructions.**

# Clean Up Level 1



## Cleaning Work Area

### **Cleaning Solution:**

Follow the manufacturer's instructions to mix the cleaning solution. Keep the cleaning solution in a labeled container until used for wet wiping or wet mopping.

### **Wiping Work Area:**

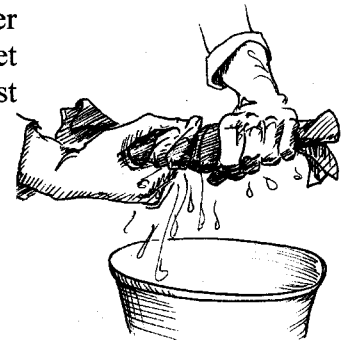
These procedures are intended to remove dust and debris from the work area following completion of the task.



Put on disposable gloves. Pour cleaning solution onto a cloth or paper towel. Wring excess solution into bucket. Wipe work area with wet towel. If more than one paper towel is needed, dispose of the first towel and use a second one for the next section.



**Rinse Bucket**

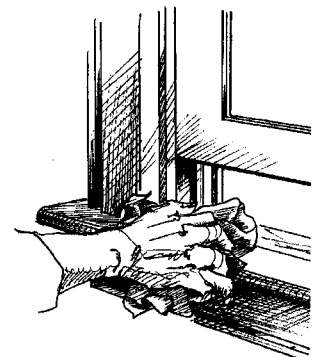


**Dirty Bucket**

Wet another towel with the clean water in the bucket. Wring out excess water.

Rinse the work surface with the wet towel. If more than one paper towel is needed, dispose of the first paper towel and use a second one for the next section.

Wipe off the drop cloth and tools using the same procedures. Fold up drop cloth for future use.



# Clean Up Level 1 (continued)



## *Disposal*

Place all waste in a disposal bag and seal the bag.

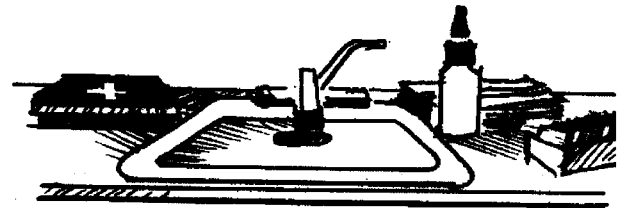
Waste generated during O&M work may be regulated as a hazardous waste as described under the Resource Conservation and Recovery Act (RCRA). In addition, State and/or local regulations must be complied with. Hazardous waste requirements under RCRA and other state/local regulations describe the necessary treatment of the waste to ensure that its handling and disposal will not adversely impact the environment.



## *Worker Hygiene*

Thoroughly wash face and hands after O&M work activities. Do not eat, drink, smoke, or apply cosmetics before washing, or while in the area during the O&M work procedure.

\* *Hygiene station contains First-Aid Kit, Running Water, Soap, and Eye-Wash Station.*



# General Procedures Level 2

Work Practices using Level 2 General Procedures are activities producing moderate amounts of dust and debris. A moderate amount of dust and debris is clearly visible, and may contain debris and paint chips, but will not spread beyond a small area drop cloth to any other surface in the room. These quantities do not require full-scale site preparation, or worker protection. Preparation and clean-up procedures were designed to protect workers and work areas from lead-based paint dust and debris and to aid in clean up of any dust and debris that is created.

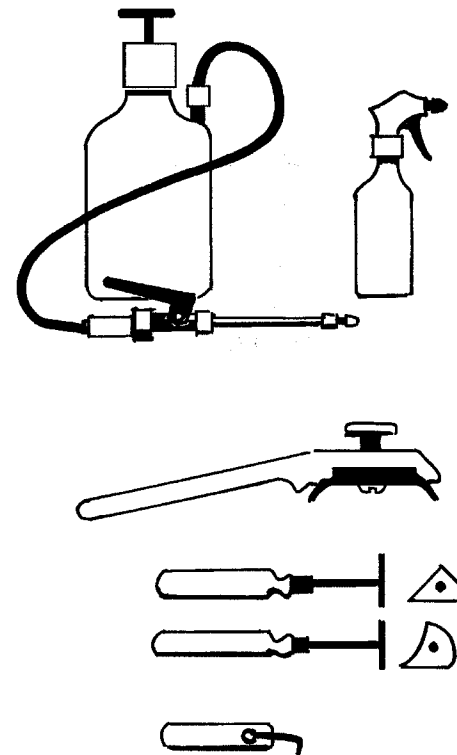
The following is a list of tools, equipment and supplies that are referenced in the work practices and are recommended to perform the work practices. For frequent O&M work, it might be helpful to maintain an "O&M cart" containing the necessary tools, equipment and materials.

- Tools**
- Garden sprayer or mister
  - Putty knife or paint scraper
  - Utility knife

- Supplies**
- Plastic drop cloth
  - Tape
  - Mop and mop bucket
  - 2 Buckets with clean water
  - Sponges
  - Clean cloths
  - Paper towels
  - Plastic disposal bags
  - Detergent

**Personal Protective Equipment**

- Disposable shoe coverings
- Disposable gloves
- Safety glasses



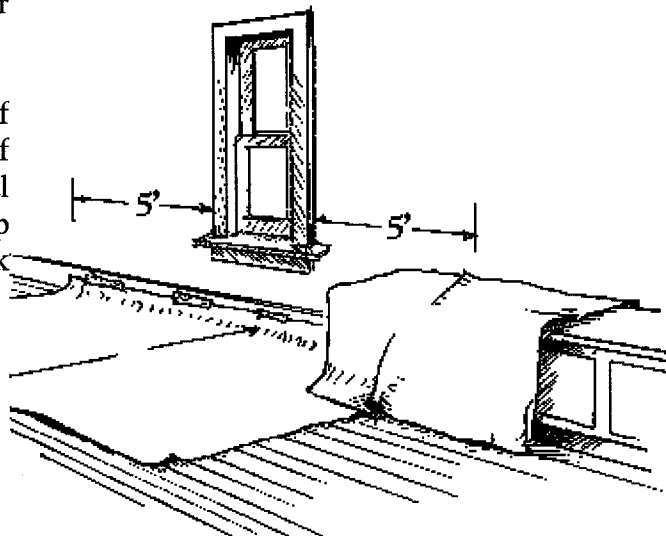
# Preparation Level 2



## **Dust Control**

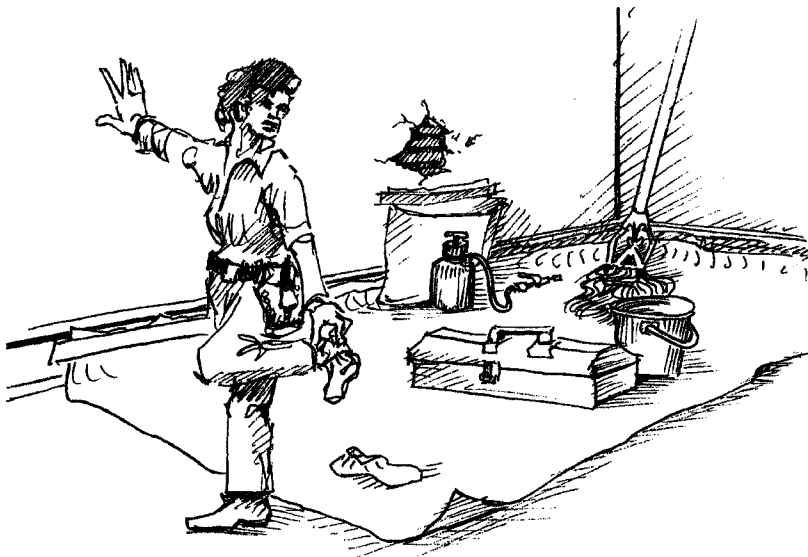
Move furnishings and equipment away from area of work. Place plastic drop cloth over fixed-in-place equipment or furnishings.

Place plastic drop cloth on floor under area of work extending five (5) feet from all areas of work on lead-based paint. Lap and seal additional drop cloths as necessary. Turn drop cloth up baseboard of wall within the work area and seal to wall with tape.



## **Personal Protection**

Disposable gloves and shoe coverings are recommended to prevent the spread of LBP dust to other areas. Shoe coverings should be removed when stepping off the plastic drop cloth. Work gloves and goggles should be worn as required for protection during the O&M procedure.

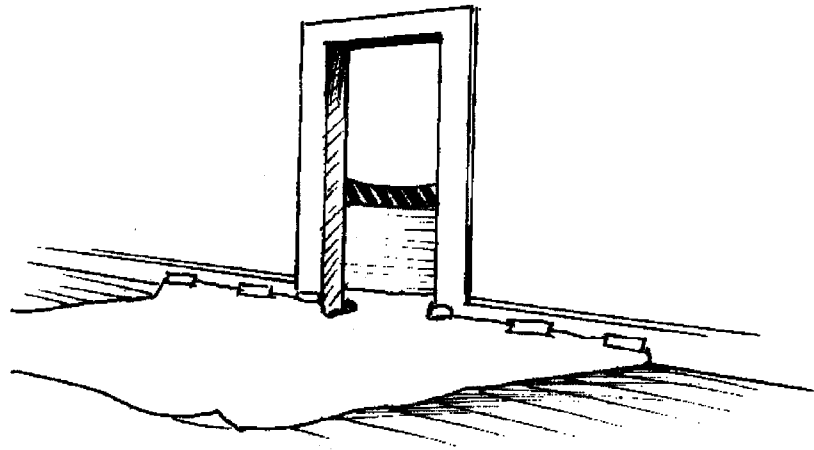


## Preparation Level 2



### **Access**

Limit access through the work area to O&M workers. A tape "barricade" may be placed across door openings to help control traffic.



**Proceed to Work Practice Instructions**

# Clean Up Level 2



## Cleaning Work Area

### Wiping Work Area

**Cleaning Solution:** - Follow the manufacturer's instructions to create the cleaning solution. Keep the cleaning solution in a labeled container until used for wet wiping or wet mopping.

Fill two buckets with clean water and place them in the work area with the container of cleaning solution. The buckets should be designated clean rinse, and dirty rinse. If the mop bucket is handy, it may be used as a third dirty wring container.

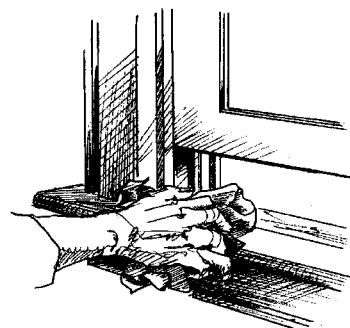
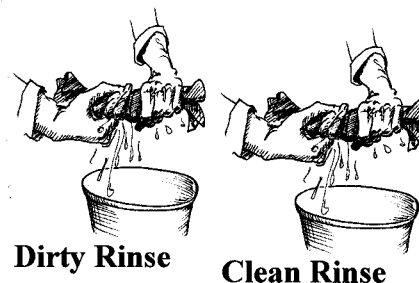
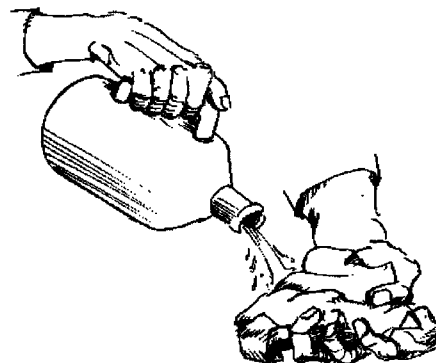
**Cleaning Work Surface:** - Pour cleaning solution onto a clean cloth. Wring excess solution into the dirty bucket without placing the cloth into the bucket. Wipe the work surface with the cloth. Add more cleaning solution to the cloth and continue wiping until the entire surface area has been covered. Discard all cloths used in this procedure in the disposal bag.

**Rinsing Work Surface:** - Dip and wring out a clean cloth in the first rinse bucket. Wipe off the work area. Rinse the cloth in the first bucket again and wring out thoroughly. Rinse the cloth in the second bucket and wring out thoroughly again.

**Note:** Rinse water should be changed periodically, depending on the amount of contamination.

Continue to clean the work surface with the cloth and rinse using this procedure until the entire work surface has been cleaned.

**Remove Drop Cloth:** - Wipe dust off all tools and equipment. Place these cleaned items away from the work area. Use wet paper towels to pick up accumulations of dust or debris. Drop cloth should be rolled inward and placed in disposal bags with other waste.





## Clean Up Level 2 (continued)

### Mopping Work Area

**Clean Work Area:** - Collect any visible debris using wet cloths before mopping the area. Mopping should also be done by the **three-bucket** method. The buckets should be labeled or designated cleaning solution, clean rinse, and dirty rinse (mop bucket), as shown below. Pour cleaning solution into the cleaning bucket. Fill the two rinse buckets with clean water. Follow the sequence of steps below.

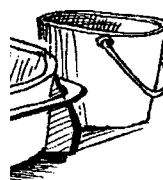
**One** Place the mop into the cleaning solution and wring excess solution into the mop bucket.

**Two** Mop small sections of the work area until the mop is dry.

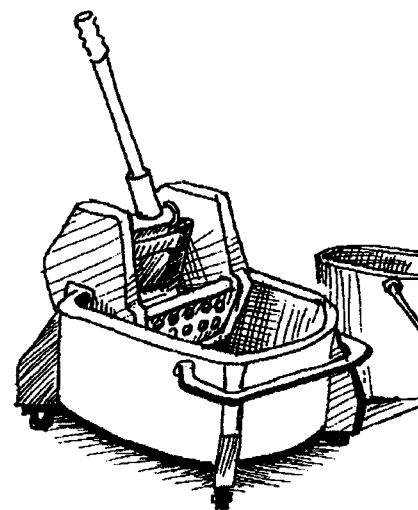
**Three** Slosh the mop in the rinse bucket and wring thoroughly.

**Four** Repeat step One.

**Note:** The rinse water in the two buckets should be changed periodically, depending on the level of contamination.



Cleaning  
Solution



Rinse Bucket  
Mop Bucket

Continue this process until the entire surface has been thoroughly cleaned.

**Rinsing Work Area:** - Rinsing should also be done by the **three-bucket** method except that the cleaning solution is exchanged for a second rinse bucket, as shown below. Fill the two rinse buckets with clean water. Follow the sequence of steps below.

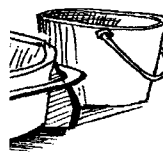
**One** Place the mop into the clean rinse bucket and wring excess solution into the mop bucket.

**Two** Mop small sections of the work area until the mop is dry.

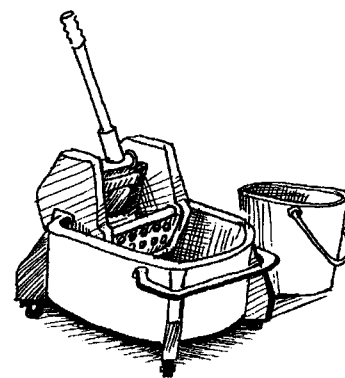
**Three** Slosh the mop in the dirty rinse bucket and wring thoroughly.

**Four** Slosh the mop in the clean rinse bucket and wring thoroughly.

**Five** Repeat step One.



Clean  
Rinse



Dirty Rinse  
Mop Bucket

**Note:** The rinse water in the two buckets should be changed periodically, depending on the level of contamination.

Continue this process until all areas have been thoroughly rinsed.

## Clean Up Level 2 (*continued*)



### *Disposal*

Drop cloths should be rolled inward and placed in disposal bags with other waste.

Waste generated during O&M work may be regulated as a hazardous waste as described under the Resource Conservation and Recovery Act (RCRA). In addition, individual State and/or local regulations must be complied with. Hazardous waste requirements under RCRA and other state/local regulations describe the necessary treatment of the waste to ensure that its handling and disposal will not adversely impact the environment.



### ***Worker Hygiene:***

After all work has been completed, thoroughly wash face and hands. Do not eat, drink, smoke, or apply cosmetics in the work area during O&M activities or before washing.

Hygiene station contains First-Aid Kit, Running Water, Soap, and Eye Wash Station.

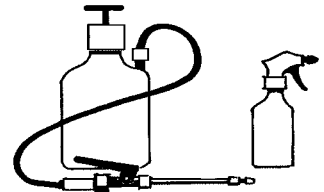
# General Procedures Level 3

Work Practices using Level 3 General Procedures are activities that generate substantial quantities of dust and debris. This level of dust and debris cannot be contained in the work area simply by the use of drop cloths or may generate airborne lead levels in excess of the action level established by OSHA (see *Chapter 5*). Full-scale site preparation is required to minimize contamination of nearby areas, and worker protection is required to protect health. Cleaning procedures are provided to help remove lead dust and debris before occupants are allowed to return.

The following is a list of tools, equipment, and supplies that are referenced in the work practices and are recommended to perform the work practices. For frequent O&M work, it might be helpful to maintain an "O&M cart" containing the necessary tools, equipment, and materials.

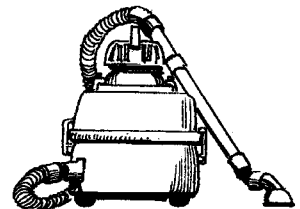
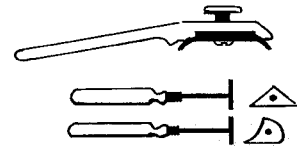
## Tools

- Garden sprayer or mister
- Putty knife or paint scraper
- Utility knife
- HEPA vacuum with attachments



## Supplies

- Plastic drop cloth
- Tape
- Warning signs
- Warning barrier tape
- Mop and mop bucket
- 2 Buckets with clean water
- Sponges
- Clean cloths
- Paper towels
- Plastic disposal bags
- Detergent



## Personal Protective Equipment

- Respirators equipped with HEPA filters
- Disposable coveralls
- Disposable shoe coverings
- Disposable gloves
- Safety glasses

# Preparation Level 3

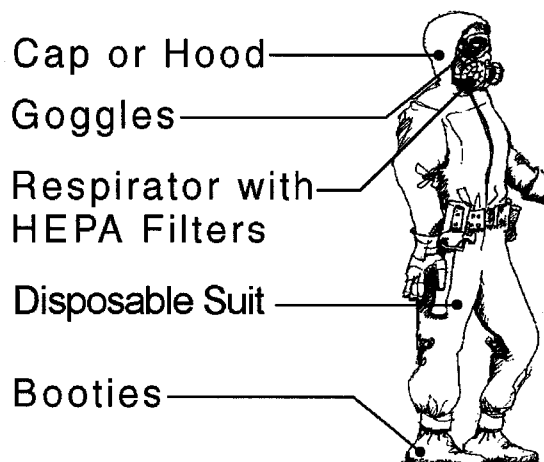


## Personal Protection

Respirators, disposable coveralls, or reusable clothing, hoods, shoe covers and gloves are required to protect workers from lead-based paint dust and to keep them from carrying the dust to other areas. The respirator should be at least a half-face negative pressure respirator with high efficiency particulate air (HEPA) filters. The respirator must meet OSHA regulations. The respirator must be fit tested, used, and maintained in accordance with OSHA regulations.

**Note:** Reusable clothing should be laundered periodically and not taken home.

**Note:** If other hazardous substances are present, workers may need respirators equipped with HEPA filters and other filters. For example, if acetone is also present in high concentrations, respirators should be equipped with combination HEPA filter/organic vapor cartridges.



## Dust Control

If possible, move all furnishings and equipment out of the area of work. Place plastic drop cloths over and under fixed-in-place equipment or furnishings to remain in room or work area. Lap and seal covering so that dust and debris cannot become lodged on these items or fall into them.

Place plastic drop cloth on floor in room or area of work. Extend plastic ten (10) feet from all areas of work on lead-based paint including any area where paint debris may be thrown by O&M activity. Lap and seal additional drop cloths to make a complete floor area containment. Turn plastic up baseboard of walls within the work area and seal to wall with tape.

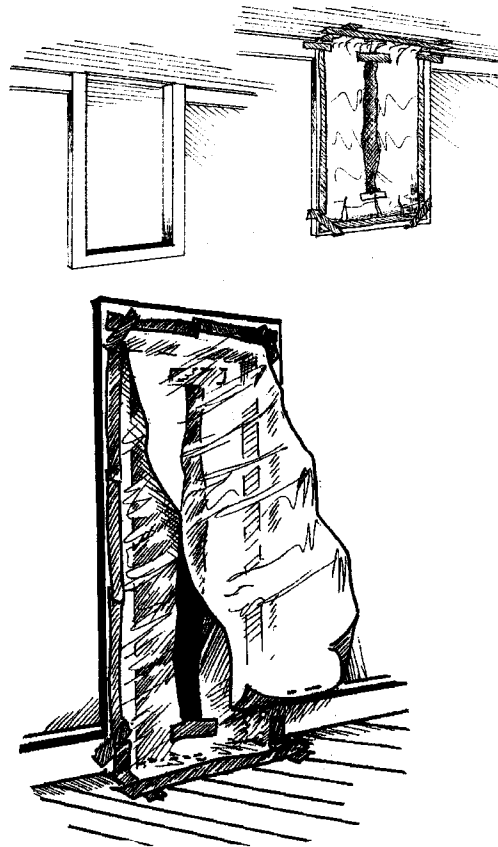


## Preparation Level 3 (continued)



### Access

The work area must be vacated and secured by means of scheduling, locking, or use of traffic barriers. Overlapped polyethylene "flap" doorways should be installed at the entrance to the work area or room. Only O&M workers should be allowed in the work area. Workers should not leave the established work area wearing protective clothing during or after O&M procedures. Remove all protective clothing carefully to keep dust and debris within the work area.



**Proceed to Work Practice Instructions**

# Clean Up Level 3



## Cleaning Work Area

### Debris Removal:

After completing the work, pick up all pieces of debris from the O&M operation using wet cloths and place in 6 mil disposal bag. Place larger items in 6 mil plastic and wrap securely for transport and disposal.

HEPA vacuum the work area and the plastic to remove visible dust and debris.

### Wiping Work Area

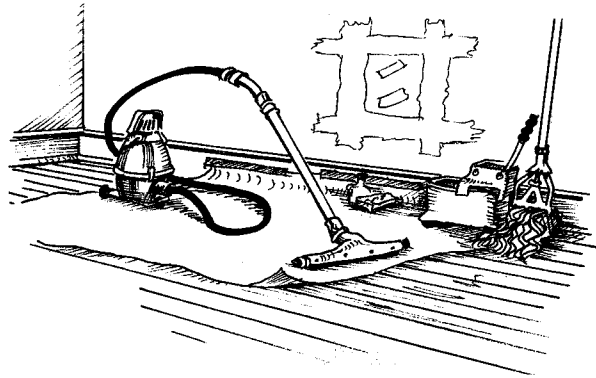
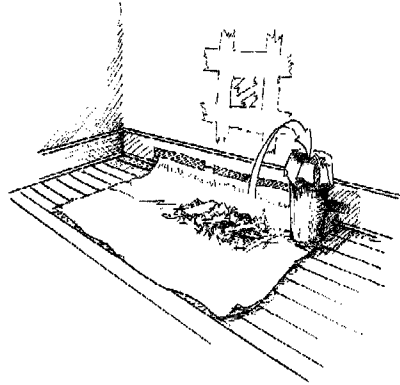
**Cleaning Solution:** - Follow the manufacturer's instructions to create the cleaning solution. Keep the cleaning solution in a labeled container until used for wet wiping or wet mopping.



**Dirty Rinse**

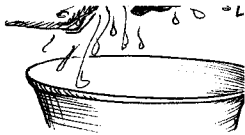
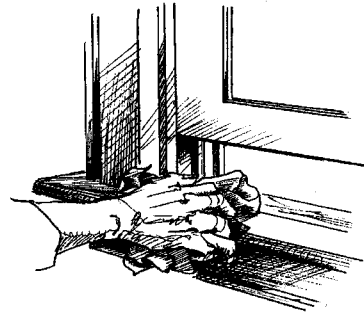
Fill two buckets with clean water and place them in the work area with the container of cleaning solution. The buckets should be designated clean rinse and dirty rinse. If the mop bucket is handy, it may be used as a dirty bucket for wringing the cloths.

**Cleaning Work Surface:** - Pour cleaning solution onto a clean cloth. Wring excess solution into the dirty bucket without placing the cloth into the bucket. Wipe the work surface with the cloth. Add more cleaning solution to the cloth and continue wiping until the entire surface area has been covered. Discard all cloths used in this procedure in the disposal bag.



## Clean Up Level 3 (continued)

**Rinsing Work Surface:** - Dip and wring out a clean cloth in the first rinse bucket. Wipe off the work area. Rinse the cloth in the first bucket again and wring out thoroughly. Rinse the cloth in the second bucket and wring out thoroughly again.



**Note:** Rinse water should be changed periodically, depending on the amount of contamination.

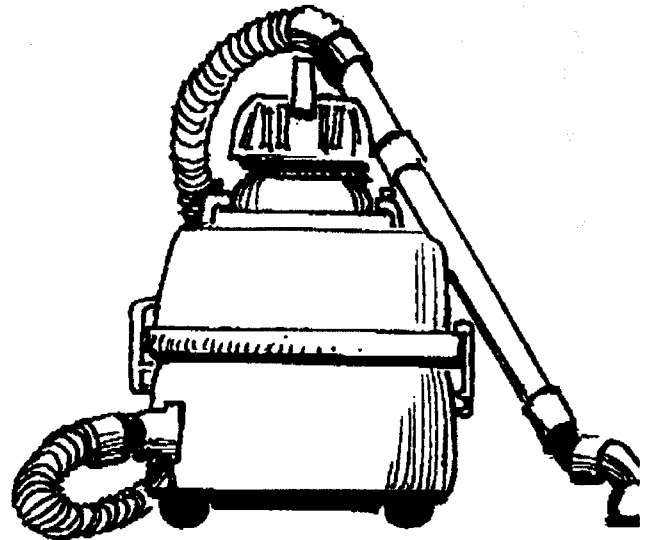
Continue to clean the work surface with the cloth and rinse using this procedure until the entire work surface has been cleaned.

### Clean Rinse

#### **HEPA Vacuuming:**

HEPA vacuum the disposable coveralls and shoe coverings to remove any dust. Remove suit, gloves and shoe coverings and place in a disposal bag.

**Remove Drop Cloth:** - Wipe dust off all tools and equipment. Place these cleaned items away from the work area. Use wet paper towels to pick up accumulations of dust or debris. Remove all "flap" covers from entrances and place them in disposal bags. Drop cloth should be rolled inward and placed in disposal bags with other waste.



**United States Postal Service  
Davenport Main Post Office  
Davenport, Florida**

**Lead Based Paint  
Operations  
And  
Maintenance  
Program**



## **Work Practice Level Summary**

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	<b>Page #</b>	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>
<b>WP1</b> – Removing Paint Chips and Debris		<b>4-4</b>	<b>4-4</b>	<b>4-5</b>
<b>WP2</b> – Cleaning Damaged or Deteriorated Surfaces			<b>4-7</b>	<b>4-7</b>
<b>WP3</b> – Removing Small Areas of Paint		<b>4-9</b>	<b>4-9</b>	<b>4-10</b>
<b>WP4</b> – Wet Sanding			<b>4-11</b>	
<b>WP5</b> – Applying Coatings to Lead-Painted Surface		<b>4-13</b>	<b>4-13</b>	<b>4-14</b>

# WP1 Removing Paint Chips and Debris

## **Description**

Lead-based paint chips and debris should be removed from surfaces in preparation for other O&M work and to prevent future contamination of surrounding areas. Wet methods must be used to minimize airborne dust containing lead.

## **Examples**



### **Level 1**

- Removing negligible amounts of lead paint dust or debris from surfaces using tape.
- Removing negligible amounts of lead paint dust or debris from exposed cavities.



### **Level 2**

- Chipping loose paint from flaking surfaces.
- Collecting debris and unattached chips for disposal.
- Removing moderate amounts of lead paint dust or debris from exposed cavities.



### **Level 3**

- Removing debris following unexpected disturbance of lead paint and substrate.
- Vacuuming lead paint debris with HEPA-filtered vacuum.
- Removing significant amounts of lead paint dust or debris from exposed cavities.

## **Work Practice**

### **Preparation**

Use the *General Procedures* level appropriate for the actual level of work. When working on a floor, surround the work area with drop cloths, taping the edges around the work area.

## ***Performance Level 1***



### ***Dust and chip removal:***

Negligible quantities of lead paint dust and chips can be removed effectively by using strong tape. The tape can be wrapped "tacky" side out around the fingers and the surface tapped lightly until all loose paint fragments adhere to the surface of the tape. The used tape should be placed in a disposal bag.

This approach can be used to remove dust from surfaces and inside exposed cavities prior to cleaning. See ***WP2 - Cleaning Damaged or Deteriorated Surfaces*** for cleaning procedures.

## ***Performance Level 2***



### ***Collecting dust or debris:***

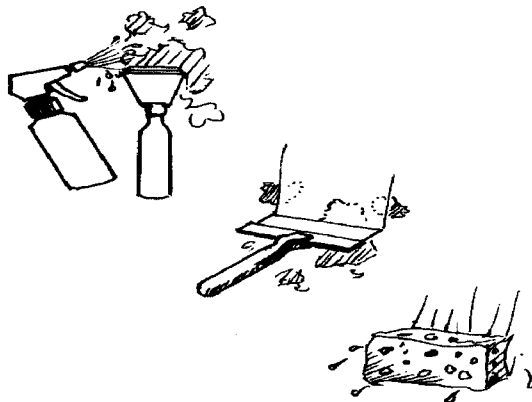
Moderate amounts of lead paint, dust, or debris can be collected from surfaces or exposed cavities using wet cloths. The cloths, with the dust or debris, should be placed in a disposal bag.

As an alternative, LBP dust and debris can be collected using a HEPA vacuum and the surface cleaned using ***WP2 - Cleaning Damaged or Deteriorated Surfaces***.

### ***Chipping loose paint: -***

Mist the work area. Using a putty knife or scraper, carefully scrape loose paint flakes and deteriorated subsurfaces. Carefully chip or wet sand (*see WP4 - Wet Sanding*) all edges until no loose paint remains on the surface. Collect any debris created with wet cloths and place in a disposal bag.

*Illustration also shows skim coating a rough surface and smoothing the skim coating with a damp sponge.*



### *Performance Level 3*

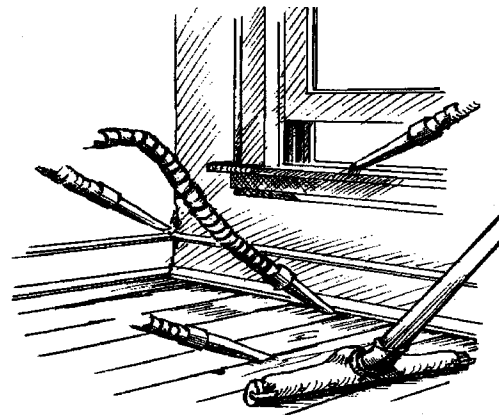


#### ***Removing debris:***

Mist the debris with a cleaning solution during collection to minimize the spread of lead-containing dust. Collect all paint chips and debris using wet methods (sweeping, mopping, wiping). Remove the debris from smaller "sub-areas" of a large surface to prevent building up large piles of lead-containing waste. Place all debris into disposal bags.

#### ***HEPA vacuuming: -***

Areas with large quantities of lead paint dust or debris should be HEPA vacuumed. Use an attachment appropriate for the surface being cleaned. For example, the crevice tool may be used to clean floor cracks, along baseboards, or in corners. Vacuum the entire surface thoroughly, overlapping each pass of the HEPA vacuum. After cleaning the entire surface, complete a second cleaning with a series of passes 90 to the first series.



Refer to Work Practice WP14 - Changing Filters and Waste Bags in HEPA Vacuums for maintenance procedures and for removing lead dust from the vacuum.

#### ***Clean-up***

Perform clean-up according to the General Procedures level corresponding to the actual level of work.

# WP2 Cleaning Damaged or Deteriorated Surfaces

## *Description*

When paint surfaces are in good condition and there has been no disturbance, the *recommended housekeeping* procedures described in *Chapters 2 and 3* can be followed. Accessible surfaces with deteriorated or damaged lead-based paint should be cleaned periodically. Surfaces with deteriorated paint will require surface preparation and wet clean-up (wiping or mopping) or HEPA vacuuming. In addition, some surfaces may require an initial cleaning when LBP has been identified.

## *Examples*



### *Level 2*

Wet cleaning walls with chipped or cracked paint.  
Wet cleaning door and window trim with flaked or chipped paint.  
Mopping floors with chipped or cracked paint.  
Wet wiping window troughs or sills with flaked or chipped paint.  
Initial cleaning where dust or debris is present.



### *Level 3*

Wet cleaning or mopping surfaces where significant quantities of dust or debris are present.  
HEPA vacuuming surfaces where significant quantities of dust or debris are present.

## *Work Practice*

### *Preparation:*

Use the *General Procedures* level appropriate for the actual level of work.

## ***Performance Level 2***



### ***Surface preparation:***

If flaking or chipping paint is present, use *WPI - Removing Paint Chips and Debris*, before cleaning the surface.

### ***Cleaning:***

Use the *General Procedures - Level 2*, wet wipe or wet mop cleaning procedures, to clean the surface.

## ***Performance Level 3***



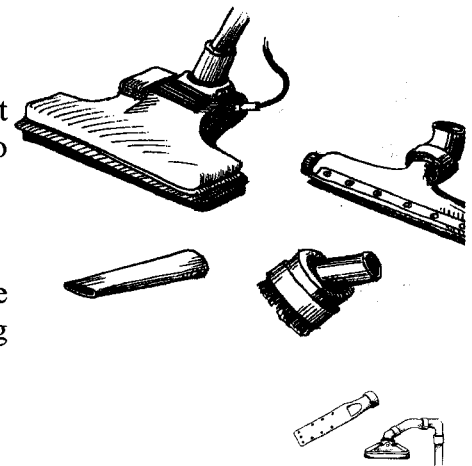
### ***Surface preparation:***

If flaking or chipping paint is present, use *WPI - Removing Paint Chips and Debris*, before cleaning the surface.

### ***Cleaning:***

Use the *General Procedures - Level 3*, wet cleaning and HEPA vacuuming procedures to clean the surface.

**Note:** Many different attachments are available for HEPA vacuums, which will allow cleaning most surfaces.



### ***Clean Up:***

Follow the *General Procedures* appropriate for the actual level of work.

# WP3 Removing Small Areas of Paint

## *Description*

Sometimes small areas of lead-based paint must be removed to prepare the surface for other work. Lead-based paint can be removed from various types of surfaces using several techniques. This work practice includes methods for wet scraping, chemical removal, and mechanical or abrasive paint removal.

## *Examples*



### *Level 1*

Wet scraping paint removal prior to attaching hardware such as a coat hook, picture hanger, etc. See *WP6 - Attaching to a Lead-Painted Surface*.

Wet scraping paint removal prior to drilling a small hole. See *WP4 - Penetrating Lead-Based paint*.



### *Level 2*

Wet scraping paint removal of a moderate size area prior to attaching hardware such as multiple coat hooks, door knobs, etc. See *WP6 - Attaching to a Lead-Painted Surface*.

Wet scraping paint removal prior to undercutting a door. See *WP4 - Penetrating Lead-Based Paint*.

Wet scraping paint removal prior to cutting larger holes, such as those needed to pass rigid electrical conduit through a wall. See *WP4 - Penetrating Lead-Based Paint*.



### *Level 3*

Chemical removal of paint.

Wet scraping paint removal of larger areas prior to attaching items such as cabinets, etc. See *WP6 - Attaching to a Lead-Painted Surface*.

## *Work Practice*

### *Preparation*

Use the *General Procedures* level appropriate for the level of work.

## Performance Level 1



### *Hand scrape paint removal:*

Mist the area to be scraped. Cut around the area to be removed with a utility knife. Remove the paint to the substrate using a scraper. Collect dust or debris with a wet paper towel. Place all debris in a disposal bag.

## Performance Level 2

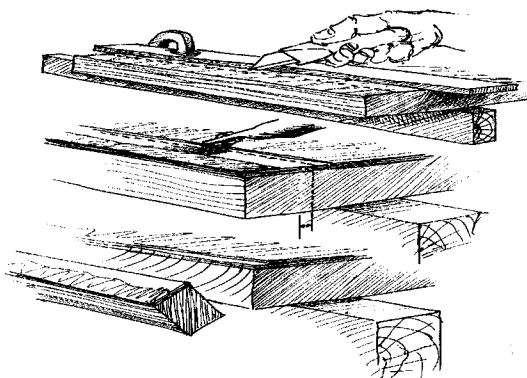


### *Hand scrape paint removal:*

Mist the area to be scraped. Cut around the area to be removed with a utility knife.

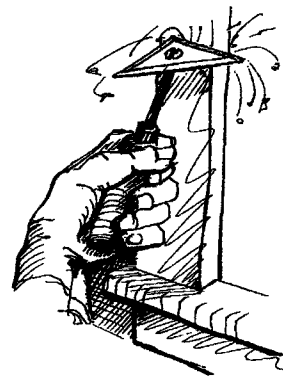
Remove the paint from the surface using a knife or scraper. The work area should be misted during this process to minimize airborne dust. Scrape the paint down to the bare substrate using a scraper. Keep the surface wet while scraping. Scrape the edge of the adjacent painted surface until no loose paint remains along the edge.

Use wet cloths to pick up paint chips and debris. Place cloths with debris in a disposal bag.



*The above example is for paint removal prior to undercutting a door with a power saw.*

**Caution:** Dry methods, such as dry scraping, should never be used to remove lead-based paint.





## Performance Level 3



### ***Chemical paint removal:***

Follow manufacturer's instructions for chemical application on the paint removal area. Chemical paint removers can be very hazardous and must be used with caution. Collect the chemical residue with the removed paint according to the manufacturer's instructions. Place all waste in a disposal container recommended by the manufacturer.

Some chemical removers require the area to be neutralized using another chemical before cleaning. See manufacturer's instructions for neutralization requirements.

**Note:** Respirators used during chemical paint removal must be equipped with cartridges that will filter both lead and the vapors associated with the chemical remover or neutralizer. See manufacturer's instruction for respirator cartridge requirements. Chemical removers may be caustic and require the use of gloves for skin protection. See manufacturer's recommendations for specific gloves.

### ***Mechanical or abrasive paint removal:***

Drop cloths or plastic sheeting should cover enough area around the work surface to prevent the spread of dust during this procedure.

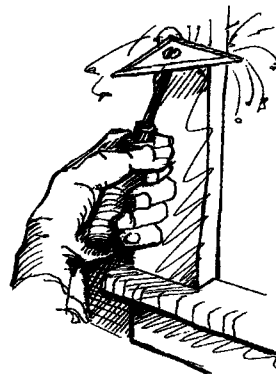
Mist or wet the work surface sufficiently to keep dust to a minimum. Keep the work surface wet during the entire removal operation.

**Caution:** Dry scraping methods should never be used to remove lead-based paint.

**Pick up visible dust and debris with wet cloths and place in a disposal bag.**

### ***Clean-up***

HEPA vacuum the work surface and perform the clean-up procedures found in the *General Procedures* level corresponding to the level of work.



# WP4 ■ Wet Sanding

## Description

Performance of other work practices may direct you to use wet sanding methods as part of surface preparation or to finish a surface after completing other work. This work practice describes how to minimize lead dust while sanding.

## Examples



### Level 2

- Wet sanding painted wood or metal surfaces.
- Wet sanding cut edges to smooth rough paint edges.

## Work Practice

### Preparation

Use the *General Procedures* Level 2.

### Performance ■ Level 2



#### **Wet sanding:**

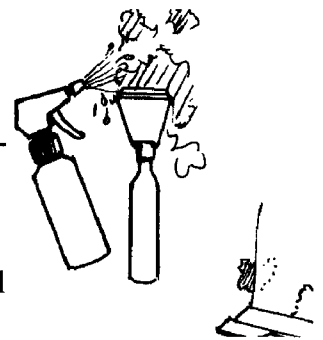
Mist the surface. Remove all loose paint from the surface using damp sandpaper or damp abrasive sponge. Continue misting the work surface during the entire operation. Periodically mist any dust and debris that is created by the sanding process to minimize its spread to other areas. It is important that the surface should remain wet during the entire process.

Wet sand the edges of any paint that will not be removed until no loose paint remains.

**Caution:** Dry sanding techniques should never be used to remove lead-based paint.

#### **Clean-up:**

Perform clean-up according to the *General Procedures* level corresponding to the actual level of work.



# WP5 Applying Coatings to Lead-Painted Surfaces

## *Description*

Surface preparation is an important element of this work practice. It is essential the surfaces be clean and stable prior to application of coating materials. Manufacturers' instructions must be followed precisely.

Where paint is in good condition and coating will not cause visible flaking or chipping, coatings can be applied with normal preparation. Where paint is flaking or surface is unsound, preparing and applying a coating will require additional precautions.

## *Examples*



### *Level 1*

Applying paint or sealer over surfaces in good condition.  
Preparing for and applying liquid encapsulants over surfaces in good condition.



### *Level 2*

Applying paint or sealer over painted surfaces that are cracked or chipped.  
Applying liquid encapsulants over painted surfaces that are cracked or chipped.  
Applying paint over glossy surfaces after abrasive preparation of the surface.



### *Level 3*

Applying paint or sealer to deteriorated painted surfaces.  
Applying liquid encapsulants over surfaces with deteriorated substrates.

## *Work Practice*

### *Preparation*

Use the *General Procedures* level corresponding to the actual level of work.

## ***Performance Level 1***



### ***Paint and sealer application:***

Coatings may be applied directly over lead-painted surfaces. Take precautions to minimize disturbance of surfaces below the newly-applied coating.

### ***Liquid enclosure material (encapsulants):***

All liquid encapsulants should be applied following the manufacturers' instructions. The material should first be applied to a small area to determine if it is compatible with the lead-painted surface. The material should adhere to the surface, form a continuous hard finish and provide a permanent barrier.

**Note:** HUD defines permanent as 20 year service life.

Apply the encapsulant so that it forms a continuous, permanent seal around the lead-painted surface. Do not disturb the surface until the encapsulant completely hardens.

**Note:** Encapsulants should not be used on friction surfaces such as floors. Friction can cause the encapsulant to deteriorate and expose the lead-painted surfaces again.

## ***Performance Level 2***



### ***Surface Preparation:***

Use *WP3 - Removing Small Areas of Paint* to remove any chipped or cracked paint from the work surface. All remaining paint must be well adhered to the underlying layers and to the substrate. Collect any dust and debris created by this process with wet cloths and place in a disposal bag.

### ***Paint or sealer application:***

Paint or sealer can be applied directly over the surface. Take precautions to minimize disturbance of the surface below the newly applied coating.

### ***Liquid Encapsulants:***

All liquid encapsulants should be applied following the manufacturer's instructions. The surface should be cleaned using the manufacturer's instructions to eliminate dirt, oil and grease, chalking, and other conditions that would inhibit good adhesion of the coating to the existing surface. Under certain conditions, the surface must be primed prior to applying a liquid encapsulant. See the manufacturer's directions.

### ***Performance Level 3***



#### **Surface preparation:**

Follow the *Level 2* surface preparation procedures. Use a HEPA vacuum to collect paint chips and debris.

#### ***Paint or sealer application:***

Paint or sealer can be applied directly over the surface. Take precautions to minimize disturbance of the surface below the newly applied coating.

#### ***Liquid Encapsulants:***

Most liquid encapsulants can be applied using the *Level 2* application procedures.

Some liquid encapsulant coating systems are suitable for use where the existing substrate is deteriorated for some reason. The selection of the encapsulant system should be made based on the anticipated level of mechanical stress and abuse. Consult the manufacturer for help in selecting the proper encapsulant system.

Some encapsulant coating systems have the ability to fill cracked and/or damaged substrates due to the allowable thickness of the coating. If these coatings are reinforced, the strength of the system is greatly increased.

#### ***Clean-Up***

Perform clean-up according to the *General Procedures* corresponding to the actual level of work being performed.

**CONTRACT NUMBER: 475450-94-B-0324  
PROJECT NUMBER: H12291  
WORK ORDER NUMBER: 664.00**

**ASBESTOS OPERATIONS AND MAINTENANCE PLAN**

**DAVENPORT MAIN POST OFFICE  
1 SOUTH BOULEVARD EAST  
DAVENPORT, FLORIDA 33837-9998**

**PREPARED FOR:**

***U.S. Postal Service  
Suncoast District  
2203 N. Lois Avenue  
Suite 1100  
Tampa, Florida 33607-7110***

**PREPARED BY:**

***EMCON  
5909-G Hampton Oaks Parkway  
Tampa, Florida 33610-9581***

***September 1996***

**USER AGENCY: United States Postal Service**

**FACILITY NAME: Davenport Main Post Office**

**FINANCE/SUB. NO.: 112070-G01**

**FACILITY ADDRESS: 1 South Boulevard East**

**CITY, STATE, ZIP + 4: Davenport, Florida 33837-9998**

**DATE OF SURVEY: December 8, 1995**

**CONSULTING FIRM NAME: EMCON**

**CONSULTING FIRM FL ASBESTOS BUSINESS LICENSE NO.: ZA 0000021**

**CONSULTING FIRM ADDRESS: 5909-G Hampton Oaks Parkway**

**CITY, STATE, ZIP +4: Tampa, Florida 33610-9581**

**CONSULTING FIRM PHONE NO.: (813) 626-6700**

**I hereby certify that the Operations and Maintenance Plan was compiled in accordance with all applicable regulations, to the best of my ability and knowledge.**



**REPORT PREPARER/INSPECTOR SIGNATURE**

**PRINTED NAME: L. Rene' Penn**

**TITLE: AHERA Management Planner**

**CERTIFICATION NUMBER: 4783**

**I have reviewed this report and hereby certify that the information contained within satisfies the intent of the AHERA regulations, to the best of my ability and knowledge.**



**PROJECT MANAGER SIGNATURE**

**PRINTED NAME: Norman L. Platte, P.E., E.A.**

**TITLE: Florida Licensed Asbestos Consultant**

**CERTIFICATION NUMBER: EA 0000052**

SEP 09 1996

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## **ASBESTOS O&M RESPONSIBLE PARTIES**

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### **District Environmental Coordinator:**

Ms. Anne Cazares  
United States Postal Service  
Suncoast District  
2203 N. Lois Avenue, Suite 1100  
Tampa, Florida 33607-7110  
(813) 354-6276

### **Postmaster/Facility Manager:**

Steven Huffman  
Davenport Main Post Office  
1 South Boulevard East  
Davenport, Florida 33837-9998  
(941) 422-1345  
112070-G01

### **On-Site Maintenance and Custodial Staff or Contract Employees:**

United States Postal Service Maintenance and Custodial Staff and contract employees will only perform Class IV asbestos work (see Work Descriptions).

### **Environmental Consultant:**

EMCON  
5909-G Hampton Oaks Parkway  
Tampa, Florida 33610-9581  
(813) 626-6700

**GENERAL WORK PRACTICES  
FOR  
DAVENPORT MAIN POST OFFICE**

**Worker Checklist**

Level 1 Checklist	L1-1
Level 2 Checklist	L1-2
Level 3 Checklist	L1-4

**Worker General Procedures**

1	Tools, Equipment, and Materials	GP-1
2	Preparing Amended Water or Removal Encapsulant	GP-2
3	Shut-off and Lockout of HVAC and Electrical Systems	GP-2
4	Securing Work Area	GP-2
5	Putting on Respirators and Performing Fit Checks	GP-3
6	Putting on Protective Clothing	GP-4
7	Beginning and Conducting Air Monitoring	GP-4
8	Precleaning Work Areas and Wet Wiping	GP-5
9	Setting Up Work Areas	GP-6
10	Packaging and Labeling Waste	GP-8
11	Applying Lockdown Encapsulant	GP-9
12	Cleaning Equipment and Work Area	GP-10
13	Decontaminating Waste	GP-10
14	Worker Decontamination and Removal of Protective Clothing and Respirators	GP-11
15	Visual Inspection and Completing Air Monitoring	GP-12
16	Waste Transportation, Storage, and Disposal	GP-12
17	Glove Bag Removal (Also includes other types of prefabricated removal enclosures)	GP-13
18	Disposal of Contaminated Water	GP-15

**General Work Practices**

Clean Up Debris from Minor Fiber Release	WP-1
Emptying and Changing Filter in HEPA Vacuum or Changing Filter in HEPA Fan Unit	WP-4
Clean Room that has Asbestos-Containing Dust	WP-7

**SECTION 5**  
**SPECIALIZED WORK PRACTICES**



## 5 SPECIALIZED WORK PRACTICES

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The ACBM located in this facility is in good condition and should not present a danger unless it is disturbed or damaged. The maintenance and custodial personnel must take special precautions to properly clean up asbestos debris and to guard against disturbing ACBM.

The National Institute of Building Sciences (NIBS) Guidance Manual for Asbestos Operations and Maintenance Work Practices, September 1992, was adopted to satisfy the requirements of OSHA 29 CFR Part 1910.1001 and Part 1926.1101, et al., dated August 1994.

EMCON has used the requirements in 29 CFR Part 1926.1101 to update and revise the information in the NIBS document specifically for the United States Postal Service.

The cross-referenced work practices described in this section are based on ACBM identified during the facility building survey on December 8, 1995.

## Specialized Work Practices

### Baseboard Adhesive

<i>Code</i>	<i>Levels</i>	<i>Description</i>	
M24	2 3	Cut or drill asbestos-containing drywall, plaster or drywall compound	228
M25	2 3	Remove section of asbestos-containing drywall	232

### Roofing Material

<i>Code</i>	<i>Levels</i>	<i>Description</i>	
M22	1 2	Remove asbestos-containing built-up roofing	220

## M24 ■ Summary

### Cut or drill asbestos-containing drywall, plaster or drywall compound

---

#### **Summary**

This work practice covers the procedures for cutting or drilling of asbestos-containing drywall or plaster. Joint compounds and tape are also covered by this procedure.

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- Examples Level 2:**
- A. Install new electrical receptacle or ceiling junction box in asbestos-containing drywall or plaster using hand tools.
  - B. Drill holes to attach conduit to asbestos-containing drywall or plaster using non-powered hand tools.
  - C. Drill holes in asbestos-containing joint compound where drywall or plaster is non-asbestos.

- Level 3:**
- A. Install conduit or ductwork through asbestos-containing drywall or plaster using power tools.
- 

#### **Related**

#### **Work Practices**

M14 - Cut or drill asbestos cement panels.  
M15 - Remove asbestos cement panels.

---

#### **Worker**

#### **Recommendations**

One worker is usually sufficient for Level 2. Two workers for Level 3. Two workers may be needed to increase efficiency or for additional health and/or safety considerations. Workers should be trained in working with drywall and asbestos. A person with air monitoring training might be required. This person can be a worker.

**SECTION 8**  
**DOCUMENTATION**





## 8 DOCUMENTATION

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All the building asbestos management documents discussed in this Plan (inspection and assessment reports, work practices and procedures, respirator use procedures, fiber release reports, application for maintenance work and work approval forms, evaluations of work affecting ACBM, and reinspections/surveillance of ACBM) should be stored in this document (3-ring) binder.

In addition, OSHA requires that employers provide each employee their record of exposure and medical surveillance under the Records Access Standard (29 CFR 1910.20) and the Hazard Communication Standard (29 CFR 1910.1200). See the OSHA Construction Rule (29 CFR 1926.1101) or the EPA Worker Protection Rule (40 CFR 763 Subpart G) for more details of record-keeping requirements.

The USPS requires all O&M asbestos program files be retained at the facility level while ACBM is present in the facility and forwarded to a Federal Records Center for 30-year retention when the ACBM is removed. Abatement case files are also forwarded to the Federal Records Center and retained for 30 years. Note that asbestos exposure data specific to postal employees, e.g., air monitoring conducted in accordance with the OSHA asbestos standards (29 CFR Part 1910.1001 and Part 1926.1101), must be retained in accordance with the standard in the facility safety office and in individual employee medical folders as appropriate.

**NUMBERED FORMS ARE AT THE END OF THIS SECTION.**

In addition, inspection, air monitoring, and reinspection assessment data required to manage a facility-level O&M program should be retained at the local level by the Postmaster/Facility Manager. The office responsible for an abatement project maintains the abatement case file. Training records are retained by the Postal Employees Development Center (PEDC). The documentation section contains the following forms which are to be completed and maintained on site.

1. **TRAINING RECORDS** (Records for all employees and copies of all current employee certificates)
2. **CLEANING RECORDS** (Including names of custodial or maintenance workers involved, date(s), location, and methods used)

3. O&M ACTIVITY RECORDS (Including names of custodial or maintenance workers or contractors involved, start and finish dates, locations, methods used, description of work, and disposal records for any debris)
4. FIBER RELEASE EPISODE RECORDS (Including names of custodial or maintenance workers or contractors involved, start and finish dates, location, methods used, description of work, and disposal records for any debris)
5. PERIODIC SURVEILLANCE RECORD - SIX-MONTH SURVEILLANCE (Including names of custodial or maintenance workers involved, date, location and condition of material)
6. REINSPECTION - THREE-YEAR INSPECTION (Including names of AHERA/ASHARA certified Inspector/Management Planners involved, reinspection of friable and nonfriable ACBM, date of reinspection, signatures and AHERA/ASHARA Certification Numbers of Inspectors and Management Planners and locations of supplementary bulk samples, if any were taken. Include current copies of state certificates or licenses.)

# DAVENPORT MAIN POST OFFICE

## ASBESTOS OPERATIONS AND MANAGEMENT CALENDAR

**ATTENTION : Postmaster/Facility Manager**

Please complete the last column with your initials and the date when the six-month surveillance is performed.

Personnel	Action	Date	Initial (when completed)
Environmental Consultant EMCON	Initial Asbestos Survey	December 8, 1995	√
Postmaster/Facility Manager	SIX-MONTH SURVEILLANCE	June 1996	
Postmaster/Facility Manager	SIX-MONTH SURVEILLANCE	December 1996	
Postmaster/Facility Manager	SIX-MONTH SURVEILLANCE	June 1997	
Postmaster/Facility Manager	SIX-MONTH SURVEILLANCE	December 1997	
Postmaster/Facility Manager	SIX-MONTH SURVEILLANCE	June 1998	
Environmental Consultant	<b>REINSPECTION</b>	December 1998	
Postmaster/Facility Manager	SIX-MONTH SURVEILLANCE	June 1999	
Postmaster/Facility Manager	SIX-MONTH SURVEILLANCE	December 1999	
Postmaster/Facility Manager	SIX-MONTH SURVEILLANCE	June 2000	
Postmaster/Facility Manager	SIX-MONTH SURVEILLANCE	December 2000	
Postmaster/Facility Manager	SIX-MONTH SURVEILLANCE	June 2001	
Environmental Consultant	<b>REINSPECTION</b>	December 2001	

**ASBESTOS FORM 1**

## OCCUPANT INFORMATION RECORD

Receipt acknowledging that I have been informed of the presence of asbestos-containing building materials (ACBM) in the Davenport Main Post Office at 1 South Boulevard East in Davenport, Florida within the USPS Suncoast District.

I further acknowledge that the information provided to me included the following:

1. The locations of ACBM to which I might have access in the normal course of my presence in this building.
2. The hazards to health presented by these materials.
3. Appropriate behavior in the presence of these materials which will prevent or reduce the potential hazard.
4. Notification procedures which I must follow in the event I observe a possible change in the condition of any of these materials.
5. Safety procedures which I am to follow in the event of an emergency which might involve these materials.

My reason for being in the building is:

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My signature in acknowledgment of the above:

\_\_\_\_\_ Date: \_\_\_\_\_

Please print your name:

\_\_\_\_\_ Date: \_\_\_\_\_

Employer Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Phone Number: \_\_\_\_\_

**ASBESTOS FORM 2**

**United States Postal Employees Asbestos  
Operations And Maintenance Training Record**

---

**Location of Training:** Davenport Main Post Office

**Date of Training:** \_\_\_\_\_

**Postmaster/Facility Manager:** \_\_\_\_\_

**Report Received By:** \_\_\_\_\_

**Instructor:** \_\_\_\_\_

**Training Topics**

- Background Information on Asbestos
- Health Effects of Asbestos Exposure
- Worker Protection Program
- Locations of ACBM in the Facility
- Labeling of ACBM in the Facility
- Periodic Inspection of ACBM Condition
- Procedures for Maintenance/Renovation Request
- Review of Program Forms
- Specialized Cleaning Procedures and Work Practices for Custodial and Maintenance Personnel
- Review of O&M Plan
- Proper Response to Fiber Release Episodes

**Attendees (List by Name)**

1. _____	11. _____
2. _____	12. _____
3. _____	13. _____
4. _____	14. _____
5. _____	15. _____
6. _____	16. _____
7. _____	17. _____
8. _____	18. _____
9. _____	19. _____
10. _____	20. _____

**ASBESTOS FORM 3**

**Contractor's Asbestos  
Operations And Maintenance Training Record**

---

**Location of Training:** Davenport Main Post Office

**Date of Training:** \_\_\_\_\_

**Postmaster/Facility Manager:** \_\_\_\_\_

**Report Received By:** \_\_\_\_\_

**Instructor:** \_\_\_\_\_

**Training Topics**

- Background Information on Asbestos
- Health Effects of Asbestos Exposure
- Worker Protection Program
- Locations of ACBM in the Facility
- Labeling of ACBM in the Facility
- Periodic Inspection of ACBM Condition
- Procedures for Maintenance/Renovation Request
- Review of Program Forms
- Specialized Cleaning Procedures and Work Practices for Custodial and Maintenance Personnel
- Review of O&M Plan
- Proper Response to Fiber Release Episodes

**Attendees (List by Name)**

1. _____	11. _____
2. _____	12. _____
3. _____	13. _____
4. _____	14. _____
5. _____	15. _____
6. _____	16. _____
7. _____	17. _____
8. _____	18. _____
9. _____	19. _____
10. _____	20. _____

**ASBESTOS FORM 4**

# Application Form For Maintenance Work Approval

## Job Request Form for Maintenance Work

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Telephone No. \_\_\_\_\_ Job Request No. \_\_\_\_\_

Requested starting date: \_\_\_\_\_ Anticipated finish date: \_\_\_\_\_

Address, building, and room number(s) (or description of area) where work is to be performed:

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Description of work:

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Description of any asbestos-containing building material that might be affected, if known.  
(include location and type):

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Name and telephone number of requester:

---

Name and telephone number of supervisor:

---

Submit this application to:

---

(The Postmaster/Facility Manager)

**NOTE:** An application must be submitted for all maintenance work whether or not asbestos-containing building material might be affected. An authorization must then be received before any work can proceed.

\_\_\_\_\_ Granted (Job Request No. \_\_\_\_\_)

\_\_\_\_\_ With conditions\*

\_\_\_\_\_ Denied

\* Conditions: \_\_\_\_\_

---

\* To be completed by maintenance staff.

**ASBESTOS FORM 5**

## Work Evaluation Form

### Evaluation of Work Affecting Asbestos-Containing Building Materials

To be completed by Postmaster/Facility Manager

This evaluation covers the following maintenance work:

Location of work (address, building, room number(s), or general description):

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Date(s) of work: \_\_\_\_\_

Description of work: \_\_\_\_\_

Work approval form number: \_\_\_\_\_

Evaluation of work practices employed to minimize disturbance of asbestos:

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---

Evaluation of work practices employed to contain released fibers and to clean up the work area:

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---

---

Evaluation of equipment and procedures used to protect workers:

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---

Personal air monitoring results (in-house worker or contract?):

Worker name: \_\_\_\_\_ Results: \_\_\_\_\_

Worker name: \_\_\_\_\_ Results: \_\_\_\_\_

Handling or storage of ACBM waste: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

(Postmaster/Facility Manager)

**ASBESTOS FORM 6**



## Maintenance Work Authorization Form

Maintenance Work Authorization Form

No. \_\_\_\_\_

To be completed by Postmaster/Facility Manager

### AUTHORIZATION

Authorization is given to proceed with the following maintenance work:

---

---

---

---

---

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---

---

### PRESENCE OF ASBESTOS-CONTAINING BUILDING MATERIALS

\_\_\_\_\_ Asbestos-containing building materials are not present in the vicinity of the maintenance work.

\_\_\_\_\_ ACBM is present, but its disturbance is not anticipated; however, if conditions change, the Postmaster/Facility Manager will reevaluate the work request prior to proceeding.

\_\_\_\_\_ ACBM is present, and may be disturbed.

### Work Practices if Asbestos-Containing Building Materials Are Present

The following work practices shall be employed to avoid or minimize disturbing asbestos:

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---

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### Personal Protection if Asbestos-Containing Building Materials Are Present

The following equipment/clothes shall be used/worn during the work to protect workers:

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---

---

(manuals on personal protection can be referenced)

### Special Practices and/or Equipment Required:

---

---

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
(Postmaster/Facility Manager)

**ASBESTOS FORM 7**

## Fiber Release Episode Recording Form

### FIBER RELEASE EPISODE RECORDING FORM

1. Address, building, and room number(s) (or description of area) where episode occurred:

Davenport Main Post Office

Room or Area:

2. The release episode was reported by \_\_\_\_\_ on \_\_\_\_\_  
(date)

3. Describe the episode:

4. The asbestos-containing building material was/was not cleaned up according to approved procedures.

Describe the cleanup:

SIGNED: \_\_\_\_\_  
Postmaster/Facility Manager

DATE: \_\_\_\_\_

**ASBESTOS FORM 8**

# PERIODIC SURVEILLANCE RECORD SIX-MONTH SURVEILLANCE

**FACILITY NAME: DAVENPORT MAIN POST OFFICE**

**DATE:** \_\_\_\_\_  
(month, year)

**FACILITY ADDRESS:** 1 South Boulevard East  
Davenport, Florida 33837-9998

**FINANCE /SUB-LOCATION NUMBER: 112070-G01**

Homogeneous Area (HA)	Friable/Nonfriable	Material Description	Location (s)	Material Condition (Good, Fair, Poor)	Change in Condition (Yes/No)	Notes
002	N	BASEBOARD MASTIC	THROUGHOUT BUILDING INTERIOR	505 SF		
RM	N	BUILT-UP ROOFING	ROOFTOP NO CORE SAMPLING PERFORMED, THEREFORE, THE ROOF MUST BE ASSUMED TO CONTAIN ASBESTOS. PRIOR TO RENOVATION OR DEMOLITION, THE ROOF REQUIRES APPROPRIATE ASBESTOS SAMPLING.			

IF THE STATUS OF THE ASBESTOS-CONTAINING MATERIAL HAS CHANGED, THEN PHOTOGRAPH THE AREA AND RETAIN THE PHOTOGRAPH IN THE ASBESTOS O&M FILE. NOTIFY THE POSTMASTER/FACILITY MANAGER.

\_\_\_\_\_  
Signature of Person Completing the Reinspection Manager

\_\_\_\_\_  
Signature of Postmaster/Facility Manager

## ASBESTOS FORM 9

**SECTION 9**  
**LIFE CYCLE COST ANALYSIS**



## 9 LIFE CYCLE COST ANALYSIS

---

The life cycle cost analysis compares the long- and short-range costs considered in evaluating ACBM control options. The Management Planner will recommend the "least burdensome" response actions consistent with "protecting human health and the environment." The life cycle cost analysis illustrates the various factors which affect costs of conducting various response actions: removal, encapsulation, enclosure, repair, and O&M (including reinspection).

ACBM abatement and O&M costs are highly variable. Costs vary by geographical location, type of building, occupancy status, type of ACBM, amount and location of ACBM area, the hazard rating of ACBM, size and complexity of project, schedules, weather factors, retrofit or replacement materials, air monitoring, and quality of specifications.

### 9.1 ACBM Abatement

#### Cost elements of an ACBM Abatement include:

- Labor Wages, retirement funds, unemployment, health, general liability insurance
- Equipment Supplied-air compressors, filtration unit, hoses and respirators, decon units with showers, negative air units, airless sprayers, scaffolding, trucks and other vehicles
- Materials Costs Personal protective clothing, disposable filter cartridges, plastic containment materials, duct tape, glove bags, surfactants, and encapsulants
- Liability Insurance Costs Insurance policy premium
- OSHA Required Air Monitoring Air monitoring cost
- Other Costs Disposal of asbestos waste
- Profit Bid price



# LIFE CYCLE COST ANALYSIS

## Asbestos Abatement vs. O&M Program

Asbestos-Containing Building Materials	Quantity	Estimated Abatement Costs <sup>a,b</sup>	Estimated Replacement Costs	Estimated Air Monitoring Costs	Year Interval	O&M Subtotals	O&M Plan Development	Inspection Costs	Equipment Costs	Air Monitoring Costs
002	505 SF	2,015.00	1,000.00	500.00	Initial	2,346.50	2,346.50	0	0	0
RM	13,600 SF	<sup>b</sup>	54,400.00	0.00	3	1,900.00	0	1,200.00	200.00	500.00
					6	1,957.00	0	1,236.00	206.00	515.00
					9	2,015.71	0	1,273.08	212.18	530.45
					12	2,076.18	0	1,311.27	218.55	546.36
					15	2,138.47	0	1,350.61	225.11	562.75
<b>Subtotals</b>							\$2,346.50	\$6,370.96	\$1,061.44	\$2,654.56
<b>TOTAL ABATEMENT COSTS</b>										
<b>TOTAL O&amp;M COSTS</b>							\$12,433.86			

<sup>a</sup> Costs are estimated using unit costs such as dollars per square foot or dollars per linear foot for removal. Larger projects will have a lower unit cost than smaller projects of the same type. For example, a 1,000-SF area containing asbestos floor tile would typically cost \$3.00 to \$4.00 per square foot. A 10,000-SF area containing the same asbestos floor tile would typically cost \$2.00 to \$3.00 per square foot.

<sup>b</sup> There are no abatement costs for nonfriable bituminous or asphaltic roofing systems, since they can legally be removed and disposed of by a properly licensed and trained roofing contractor. Therefore, only replacement costs are estimated.