

Work Practice Controls – Lead (Pb)

This document cites the OSHA Technical Manual (OTM), OSHA Instruction TED 01-00-015 [TED 1-0.15A]. This information supports OSHA's enforcement and outreach activities to assure safe and healthful working conditions for working men and women. The content is based on currently available research publications, OSHA standards, and consensus standards. The OTM is available to the public for use by other health and safety professionals, employers, and anyone involved in developing or implementing an effective workplace safety and health program.

The National Guard Bureau (NGB) Industrial Hygiene (IH) Program performed employee exposure assessments in accordance with the OSHA 29 CFR 1910.1025(d)(2) to determine whether employees at Army National Guard (ARNG) Readiness Centers (RCs) were exposed to airborne levels of lead at or above the published standards while performing cleaning tasks in armories containing lead contamination. None of the air sampling studies found airborne levels of lead at or above the action level (AL) or permissible exposure limit (PEL) therefore the evaluation was considered a "Negative Initial Determination". Because of the negative initial determination, the stringent OSHA 29 CFR 1910.1025 requirements such as personal protective equipment (PPE), medical surveillance, showers/ change rooms, and engineering controls are not required nor applicable.

Air sampling performed inside indoor firing ranges during use or ranges converted to other uses are not included or discussed as part of this document.

Controlling Lead Exposures: Work Practice Controls

Work Practice Controls

Work practices involve the way a task is performed. OSHA has found that appropriate work practices can be a vital aid in lowering or eliminating worker exposures to hazardous substances and in achieving ongoing compliance with the PEL. Some fundamental and easily implemented work practices are: (1) good housekeeping, (2) use of appropriate personal hygiene practices, (3) use of proper procedures to perform a task, and (4) provision of supervision to ensure that the proper procedures are followed.

(1) Housekeeping

Good housekeeping involves a regular schedule of activities to remove accumulations of lead dust. The schedule should be adapted to the conditions at each facility, however, should occur at least monthly. A more frequent cleaning may be required (weekly) if the lead levels continue to remain elevated above 40 micrograms per square foot.

All workplace surfaces must be maintained as free as practicable of accumulations of lead dust. Vacuuming with a high-efficiency particulate air (HEPA) is considered the

most reliable method of cleaning dusty surfaces, but any effective method that minimizes the likelihood of re-entrainment may be used (for example, a wet floor scrubber). When vacuuming equipment is used, the vacuums must be equipped with high-efficiency particulate air (HEPA) filters.

Personnel cleaning active indoor firing ranges (IFRs) and nonfunctional IFRs (closed but not cleaned) must follow the cleaning and PPE guidance published in NGR 385-15 and NG Pam 420-15 respectively.

Personnel cleaning closed (successfully cleaned and converted) IFRs and other areas of Readiness Centers (RCs) may use the following guidelines.

PPE – gloves to protect hands from cleaning agents and chemical splash goggles to protect eyes during pouring and mixing of chemical cleaners should be used.

Start by cleaning the farthest rooms from the main entrance doors and working backward. This way contamination from 'dirty' rooms is not tracked through spaces already cleaned. Thoroughly complete the three-step process described below in each area before moving to the next.

Step 1 - HEPA vacuum all surfaces. The HEPA vacuum should be a canister style with a long hose and different attachments for cleaning different surfaces. If carpeting is present in the facility the attachment with the agitator head should also be used. Work from top to bottom of the room including ceilings, supply/exhaust vents, walls, windows, window sills, doors, radiators, heaters, pipes, lighting and plumbing fixtures, cabinets, furniture, and floors. Move the HEPA vacuum slowly and carefully over surfaces allowing adequate time to pick up all of the dust. Even sidewalks leading up to entrances and exits can be vacuumed.

Step 2 – Wet Washing. Wet wash solid surfaces and floors with solutions containing household cleaners or products specifically formulated for cleaning lead dust. Most commercially available detergents will work well. Use the three bucket cleaning process recommended by HUD listed in Attachment A. Rinse surfaces and floors with clean, fresh water. Allow surfaces and floors to thoroughly dry.

Step 3 – Repeat Step 1 and HEPA vacuum all surfaces a second time.

Change the HEPA vacuum filter using the manufacturer's instructions. Request assistance from the ARNG Environmental Office on disposal of dirty filters, vacuum bags, and mop waste water.

(2) Personal Hygiene Practices

Personal hygiene is also an important element in any program to protect workers from exposure to lead dust. Employees should wash their hands and faces prior to eating, drinking, using tobacco products, or applying cosmetics.

(3) Performance of Task

Although not required because lead has not been found at or above published standards, employers should still provide lead awareness training to employees as outlined in the OSHA hazard communication (HAZCOM) standard 29 CFR 1910.1200. The training and education will alert employees to proper personal hygiene practices to protect themselves; proper job tasks to avoid blowing or sweeping dust that may contain lead into the air; and proper housekeeping methods to remove lead from surfaces in work areas. Additionally, lead generating activities like cleaning weapons should be prohibited inside of ARNG RCs. This information can be provided through safety briefings, fact sheets, and other educational means.

(4) Weapons Cleaning Activities.

Generally, the recommendations for weapons cleaning/handling is that these activities be conducted exterior to the facility or within limited areas to minimize migration of lead particulate or other metal particulates, throughout the facility. In many instances, the unit mission requirements do not always afford soldiers the opportunity to clean/handle outside of the RC/Armory Drill Hall areas. If weapons cleaning or handling must be accomplished within the facility the following is recommended.

- Designate a specific area for weapons cleaning/training/ handling outside of the areas used by the public.
- Do not allow weapons to be cleaned or stored within food preparation or food storage areas.
- Ensure personnel clean-up area(s) and tables after each weapons cleaning activity using the prescribed wet methods.
- Tables and/or desks used for weapons cleaning should be permanently marked, "For Weapons Cleaning Only," when utilized as such.
- Tables and desks used for weapons cleaning should not be utilized for other activities or functions conducted within the facility.

(5) Supervision

Good supervision is another important work practice that ensures proper work practices are followed by employees.

Attachment A HUD Basic Cleaning Methods

HUD 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 trisodiumphosphate (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 finedust 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

Attachment A

HUD Basic Cleaning Methods

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

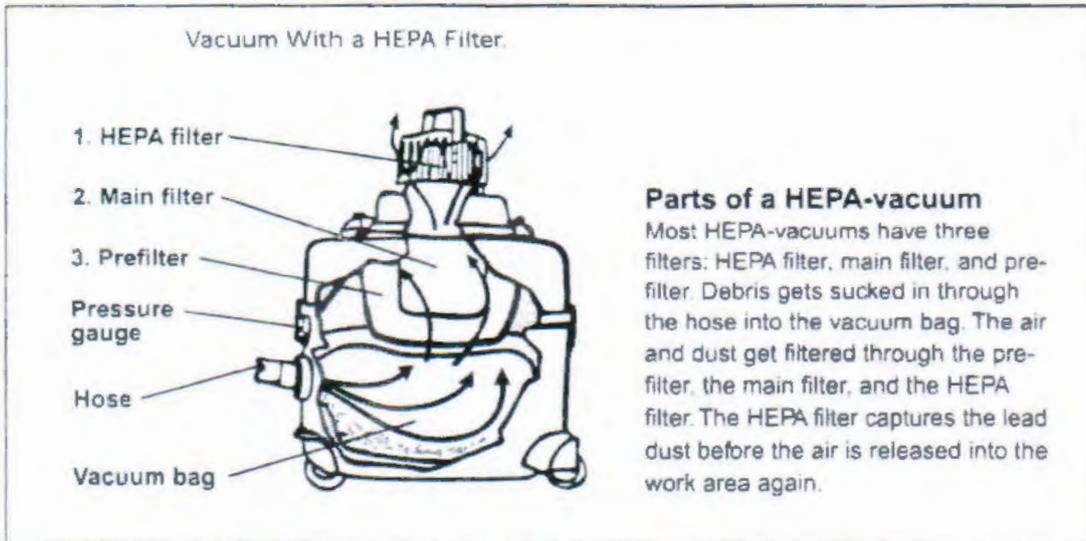
Surfaces frequently vacuumed include ceilings, walls, floors, windows, interior and exterior sills, doors, heating, ventilation, and air conditioning (HVAC) equipment (heating diffusers, radiators, pipes, vents), fixtures of any kind (light, bathroom, kitchen), built-in cabinets, and appliances. To aid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

Attachment A HUD Basic Cleaning Methods



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.

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

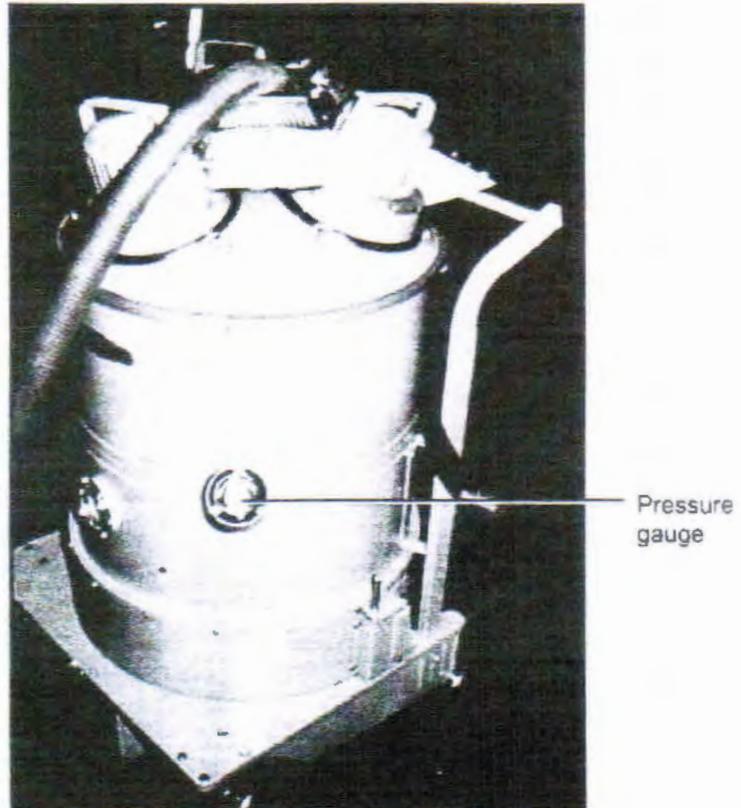
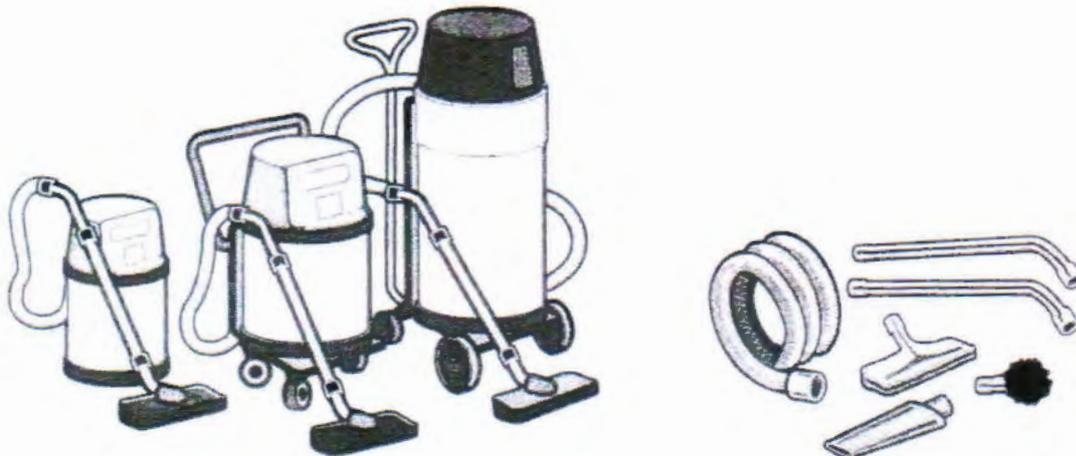


Figure 14.1b Pressure Gauge Indicator Shows When Filters Require Changing.

Attachment A HUD Basic Cleaning Methods

HEPA Vacuum Sizes and Tools.



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:

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.

Changing Cleaning Mixture

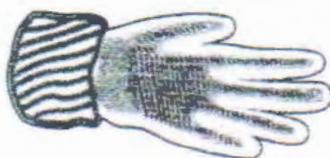
Many manufacturers of cleaners will indicate the surface area that their cleaning mixture will cover. To avoid recontaminating an area by cleaning it with dirty water, users should follow manufacturer-specified surface-area limits. However, regardless of manufacturers' recommendations, the cleaning mixture should be changed after its use for each room. As a rule of thumb, 5 gallons should be used to clean no

Attachment A HUD Basic Cleaning Methods

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



Latex



Neoprene



Nitrile

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).

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.

Attachment A HUD Basic Cleaning Methods

- ◆ 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.

(continued)

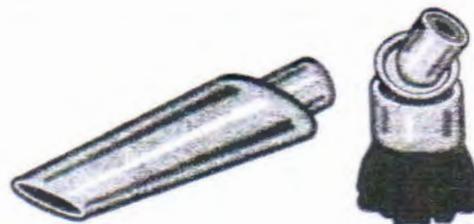
Use special attachments

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.

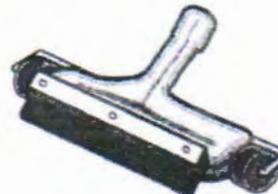


Rubber Cone

Dust Brush



Powered Carpet Beater



Wheeled Floor Nozzle

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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



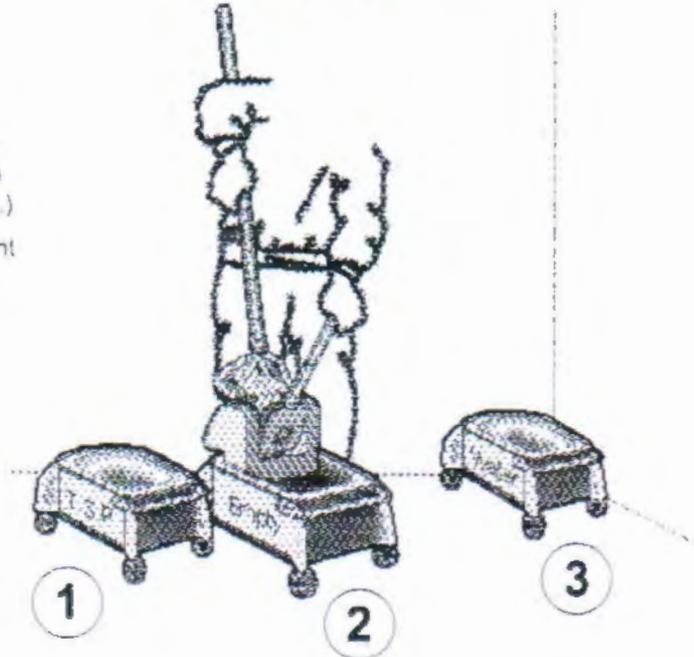
Don't Dry Sweep

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Use the 3-Bucket System.

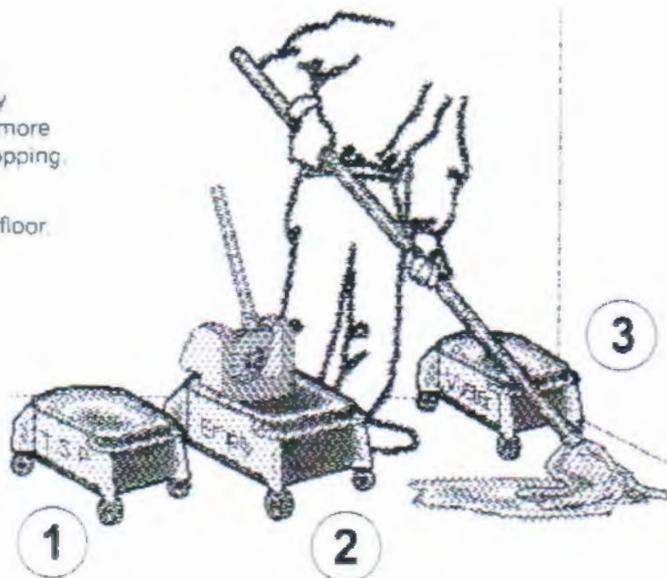
To wash: Use string mops and mop buckets with wringers. (Some experts say NEVER use a sponge mop on the floor. Sponge mops may only push the lead around on the floor, not remove it.)

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.



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Facilities Engineering

Guidelines and Procedures for Rehabilitation and Conversion of Indoor Firing Ranges

By Order of the Secretaries of the Army and the Air Force:

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Lieutenant General, USA
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History. This printing publishes a revision of NG Pam (AR) 385-16/ANGPAM 91-101.

Summary. This pamphlet prescribes policy for rehabilitation and conversion of National Guard Indoor Firing Ranges (IFR).

Applicability. This guidance applies to all persons responsible for the operation of National Guard IFRs. As no regulation/guidance can foresee all situations that might arise, the following is written in a broad scope and is intended to be interpreted so as to ensure compliance with all applicable Federal and State laws and regulations.

Proponent and exception authority. The proponent of this regulation is Chief, NGB-SG-IH. The proponent has the authority to approve exceptions to this regulation that are consistent with controlling law and regulation.

Suggested Improvements. Users of this pamphlet are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) directly to NGB-SG-IH, 1411 Jefferson Davis Highway, Arlington, VA 22202-3231.

Distribution. A.

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Glossary

1-1. Purpose

This pamphlet establishes the policy and procedures for rehabilitation and conversion, of National Guard IFRs.

1-2. References

Required and related publications and referenced and prescribed forms are listed in Appendix A.

1-3. Explanation of abbreviations and terms

Abbreviations and special terms used in this publication are listed in the glossary.

1-4. Policy and Procedures

Indoor firing ranges can be safely rehabilitated or converted for other uses, such as a storage area, classrooms or office space, provided the following –

a. Prior to conversion active ranges must be thoroughly decontaminated and cleaned to acceptable levels. *All ranges converted prior to the publication date of this pamphlet, must be inspected and evaluated to determine lead contamination.* This will be accomplished by a certified National Guard Industrial Hygienist (IH) or a person certified to perform inspections, evaluations, and determinations of IFRs IAW with OSHA standards, other nationally accepted standards, and accepted IH practices for maintenance, cleaning, conversion, ventilation, and air sampling of IFRs.

b. The level of cleanliness is to be determined by sampling. The Occupational Safety and Health Administration's (OSHA) Technical Manual, 5th Edition, provides guidance on the methods and techniques needed to collect wipe samples (Appendix B).

(1) Wipe samples must be collected and analyzed prior to and after cleaning.

(2) Post-cleaning surface wipe sample results must be less than 200 micrograms per square foot (ug/ft²) (40 micrograms in the case of child exposure). The sampling strategy, which is the amount and location of wipe samples to be collected, is provided in Appendix C.

c. Equipment/items previously stored in the range must be decontaminated and cleaned to acceptable levels as determined by a person certified to perform inspections, evaluations, and determinations of IFRs IAW with OSHA standards, other nationally accepted standards, and accepted IH practices for maintenance, cleaning, conversion, ventilation, and air sampling of IFRs.

(1) Samples must be collected from equipment/items stored in the range. Sample selection is critical, because the number of items stored, length of storage, and level of contamination differs from range to range. The amount and location of the samples should be representative of the areas where lead dust is most likely to accumulate. The more samples collected, the better the statistical comparison of the results.

(2) Samples must be collected from the smooth surfaces of the equipment/items, as much as possible. Results of samples collected from a rough surface will be inaccurate due to the minimal surface contact of the media. Further, the likelihood of tearing the media filter is greater on rough surfaces.

(3) Samples should also be collected on items stored the longest period of time, and which have not been disturbed. Items stored closest to the bullet trap and firing line are likely to have higher concentrations of lead dust.

1-5. Goal

To ensure that every IFR is free of lead dust which means to test less than 200 micrograms and to reduce the number of unsafe National Guard IFRs.

1-6. Deviation

Deviations from this guidance will require a written exception to policy from your Regional Industrial Hygiene Office. Questions and/or comments regarding this subject should be directed to your Regional Industrial Hygiene Office or Chief, National Guard Bureau, Office of the Joint Surgeon, ATTN: NGB-SG-IH, 1411 Jefferson Davis Highway, Arlington, VA 22202-3231.

Chapter 2

Health and Medical Aspects

2-1. Health Effects

29 Code of Federal Regulations (CFR) 1910.1025, Appendix A, identifies lead as a highly toxic metal. Elemental lead is indestructible, and common in the environment. Lead can enter the body by inhalation (breathing) or

ingestion (eating). In addition, lead is a cumulative poison. It accumulates in the blood, bones, and organs, including the kidneys, brain and liver. Effects include nervous and reproductive system disorders, delays in neurological and physical development, cognitive and behavioral changes, and hypertension. Symptoms include loss of appetite, difficulty sleeping, irritability, fatigue, headache, and inability to concentrate. It can stay in the bones for decades. Worker awareness and training are important to ensure that employees can recognize the symptoms of exposure and get prompt medical attention.

2-2. Medical Surveillance for Occupational Exposure to Lead (Pb)

a. Per 29 CFR 1910.1025 (j)(i-ii), Medical Surveillance - General, "The employer shall institute a medical surveillance program for all employees who are or may be exposed above the action level for more than 30 days per year. The employer shall assure all medical examinations and procedures are performed by or under the supervision of a licensed physician."

b. The DOD 6055.5-M, Occupational Medical Surveillance Manual - Table 2-1 lists medical surveillance criteria for employees "who are or may be exposed above the action level for 30 days/year."

2-3. Air Monitoring

Worker breathing zone air samples must be collected to ensure that personnel are not overexposed to airborne lead during the cleanup phase. Daily air samples will be collected from all personnel involved in the cleanup operation. These exposure levels will be used to evaluate work practices and medical surveillance requirements.

2-4. Wipe Sampling Protocol and Media

A template measuring 10 centimeters by 10 centimeters square, approximately 4 inches square, should be used to accurately measure and mark the area before collecting wipe samples. Samples should be staggered to different areas of the range. A grid system should be utilized. Samples should not be collected all on one section of a wall, or end of the building. OSHA Technical Manual provides the necessary guidance on the technique needed to collect wipe samples (Appendix B). Only distilled or deionized water will be used to saturate dry sample media. At least one field blank must be submitted with every 10 samples. The field blank must be from the same lot, and labeled as a blank.

2-5. Personal Protective Equipment

29 CFR 1910.1025 (f) (2), for housekeeping and rehabilitation the employer shall select respirators from among those approved for protection against dust, fume, and mist by the National Institute for Occupational Safety and Health (NIOSH), under the provision of 42 CFR part 84. The employer shall institute a respiratory protection program in accordance with 29 CFR 1910.134 (b), (d), (e) and (f). As a minimum, personnel conducting the decontamination of the range will be provided with the following personal protective equipment.

a. Under 29 CFR 1910.1025 (g). For employees engaged in range rehabilitation and/or range conversion, the employer shall provide at no cost to the employee, and ensure that the employee uses appropriate protective work clothing and equipment such as, but not limited to:

- (1) Protective coveralls with hood and shoe covers or disposable Tyvek™ full body suit.
- (2) Disposable rubber gloves; and disposable shoe coverlets (If necessary).
- (3) Full-face air purifying respirator with P-100 cartridges.

b. The employer shall provide the clothing required in a clean and dry condition at least daily to employees engaged in the conversion of IFRs.

c. The employer shall provide for the cleaning, laundering, or disposal of used or contaminated protective clothing and equipment.

d. The employer shall assure that all protective clothing is removed at the completion of a work shift only in areas designated for that purpose (Change Areas or Change Rooms).

e. The employer will ensure that contaminated protective clothing that is to be cleaned, laundered, or disposed of, is placed in a closed container in the change area that seals sufficiently enough to prevent dispersion of lead dust.

f. The employer will further inform in writing any person who cleans or launders protective clothing or equipment of the potentially harmful effects of exposure to lead.

g. The employer will ensure that the containers of contaminated protective clothing and equipment are labeled as follows: **CAUTION; CLOTHING CONTAMINATED WITH LEAD. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF LEAD CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE, OR FEDERAL REGULATIONS.**

Chapter 3 Education, Maintenance, Cleaning and Conversion

3-1. Worker Education

a. 29 CFR 1910.1025, Appendix B, requires an information and training program for all employees exposed to lead above the action level or who may suffer skin or eye irritation from lead. The program must inform the employees of the specific hazards associated with their work environment, protective measures which can be taken, the danger of lead to their bodies (including their reproductive systems), and their rights under the standard. In addition you must make readily available to all employees, including those exposed below the action level, a copy of this standard and its appendices. This training program will be repeated annually for personnel in range cleanup operations.

b. The commander/supervisor will ensure that each soldier or Army National Guard (ARNG) employee is informed of the following:

- (1) The content of the standard and its appendices.
- (2) The specific nature of operations that could result in exposure to lead above the action level.
- (3) The purpose, proper selection, fitting, use and limitations of respirators.
- (4) The purpose and a description of medical surveillance program.
- (5) Eating and drinking are prohibited in lead contaminated areas.
- (6) Smoking and smoking materials will not be permitted in contaminated areas.
- (7) Soldiers and ARNG employees must wash their hands and other exposed skin whenever they leave the work area.
- (8) The engineering controls and work practices associated with the individual's job assignment.
- (9) The contents of any compliance plan in effect.
- (10) Instructions to soldiers and ARNG employees that chelating agents should not routinely be used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician.

3-2. Range Cleaning Instructions

a. Written procedures, such as a scope of work, or standing operating procedure that complies with all Federal, State and local regulations must be established prior to decontamination operations.

b. The range ventilation system will be in operation during range cleaning to ensure that a negative pressure environment is maintained. In the absence of mechanical ventilation system, all doors and windows will be sealed to eliminate fugitive emissions.

c. A High Efficiency Particulate Air (HEPA) filtered vacuum system, which is designed to collect loose surface lead dust particles, is the preferred method of cleanup. If a HEPA filtered vacuum is not available, the range can be cleaned using a wet method.

d. Prohibited methods include:

(1) Wet cleaning using high-pressure systems, since this method may embed the lead into the substratum and generate large quantities of hazardous waste.

(2) Dry sweeping is not permitted.

e. All surface areas of the range must be cleaned. In addition, areas outside of the IFR where lead can be tracked must be cleaned.

f. The preferred progression of cleaning is from top to bottom and from behind the steel bullet trap to the firing line.

(1) Clean the steel bullet trap, areas in front of and behind the bullet trap, and the steel bullet trap plate(s), after removing the sand (if applicable).

(2) Clean the ceiling, floors, lights, baffles, retrieval system, heating system(s), and ventilation duct(s).

(3) Vacuum and remove acoustical material. *Painting over this material is not recommended.*

(4) Clean the floor the last, starting at the bullet trap and ending behind the firing line.

g. When using a HEPA filtered vacuum, vacuum all surface areas until no dust or residue is visible.

h. Any general purpose cleaning solutions can be used for the wet method. However, Spic and Span™ has been found to be an effective cleaning solution by other Army organizations. Mix new solutions of cleaning solution frequently. Wet wiping will require dual containers of water; one container for wetting the applicator (mops, rags, sponge, etc.) and the other container for rinsing the applicator after the dust has been wiped from the surfaces. After wet wiping all surfaces, permit the area to dry.

i. *Properly dispose of all hazardous waste. Do not place lead contaminated waste into the sewer system or onto the ground.*

(1) When placed in containers, wastewater should be left to evaporate.

(2) Mop-heads, sponges and rags will be discarded as hazardous waste following cleanup.

j. A thorough visual inspection to detect dust should be made following cleanup and prior to collecting post surface wipe samples.

k. Wood floors should receive a coat of deck enamel or urethane; concrete floors should be sealed with deck enamel.

l. As a variety of conditions exist in ranges, unique situation may arise and specific written guidance from your Regional Industrial Hygiene Office may be required.

m. Any cleaning activities must be under the supervision by a trained and competent personnel IAW with OSHA and other nationally accepted standards and the work shall be according to current industry engineering standards under the control of the State Construction and Facilities Management Officer. Cleaning must recognize that there likely will be "background" lead presence in the readiness center totally independent of the existence of an indoor range and that the method of cleaning is less important than achieving the goal of less than 200 micrograms (40 micrograms in the case of child exposure).

3-3. Cleaning Stored Contaminated Equipment

a. Equipment contaminated (sample result is higher than 200 ug/ft²) with lead dust must be decontaminated before it is removed from the range.

b. Equipment located near the bullet trap and firing line should be cleaned first and then removed. The cleaning method depends on the size of the equipment and the material it is comprised of, i.e. metal, wood, concrete, porous, non-porous, smooth or rough finish etc. However, either HEPA vacuum or the wet wipe method will be used. Refer to paragraph 3-2 for additional guidance.

c. Every attempt should be made to clean and reclaim items since disposing of equipment, as hazardous waste is costly and wasteful. Only as a last resort will the item be discarded as hazardous waste. Porous items, such as office partitions and carpet that were present during firing should be considered grossly contaminated and be discarded unless analysis proves otherwise. Consult your State Environmental Office for the proper hazardous waste disposal methods.

3-4. Contaminated Sand and Lead Waste

Consult your State Environmental Office for specific disposal guidance to ensure compliance with local laws and regulations.

3-5. Range Rehabilitation

This chapter applies to all IFRs that have been identified as candidates for rehabilitation. It provides further guidance for cleaning and/or sampling that might be required prior to the start of rehabilitation.

a. The portion(s) of the range to under go rehabilitation must be sampled to determine the level of lead contamination. Wipe samples will be taken per the established sampling protocol. See Appendix B.

b. All personnel involved in range rehabilitation will wear a NIOSH approved respirator (P-100) and proper personal protective equipment as prescribed in paragraph 2-5 above.

c. Prior to the start of rehabilitation, the environmental office must be notified to determine the disposition of any debris containing hazardous materials (lead).

d. Supervision shall be by a person who is certified to perform inspections, evaluations, and determinations of IFRs IAW with OSHA standards, other nationally accepted standards, and accepted IH practices for maintenance, cleaning, conversion, ventilation, and air sampling of IFRs. All work shall be according to current industry engineering standards under the control of the State Construction and Facilities Management Officer.

3-6. Conversion of Indoor Firing Ranges

Prior to the start of decontamination, employers must ensure that all procedures to be used comply with Federal, State, and local regulations. To ensure that all lead contamination is eradicated, the following procedure is established.

a. The State shall follow the project approval process as delineated in NGR 420-10 (or NGR 415-5 if the use of the military construction appropriation is required).

b. All ranges slated for conversion will be inspected and evaluated by the NGB Regional Industrial Hygiene Office.

- c. All equipment stored in the range, if applicable, prior to the start of decontamination must be sampled, decontaminated, re-sampled and removed or turned in as lead contaminated material.
- d. All acoustical tiles and/or sound proofing material (if applicable) must be removed and turned in as lead contaminated material through the environmental office.
- e. The bullet trap, target retrieval system and firing line stations must be removed and turned in as lead containing material through the environmental office.
- f. Light fixtures and ventilation system grills must be removed and decontaminated.
- g. Ventilation system ducts need to be decontaminated or removed and replaced.
- h. The exhaust fans and/or the complete ventilation air-handling unit (if applicable) must be decontaminated or removed to include roof fans.
- i. Cover all openings of any component previously decontaminated prior to start of interior decontamination of the firing range.
- j. Prior to start of washing, the interior of the range should be vacuumed with a HEPA filtered vacuum. The range should be washed using a cleaning solution of hot water and Spic and Span in five gallons of hot water. A progression of cleaning from top to bottom, and from back to front should be used. All surface areas of the range must be cleaned. Mix new solutions of water frequently. Washing will require dual containers of water; one container for wetting the applicators (mops, rags, sponges, etc.), and the other container for rinsing the applicators. Waste water placed into containers can be left to evaporate. *Properly dispose of all hazardous waste and do not place any lead contaminated waste into the sewer system or onto the ground.* Mop heads, sponges and rags will be discarded as hazardous waste following decontamination of the range. After completion of decontamination, and prior to taking clearance samples, the ventilation system must be run for a period of 36 hours. Wipe clearance samples will be taken from ceiling, walls and floors. The range will be considered clean if no clearance sample is greater than 200 ug/ft², if any sample is above 200 ug/ft², the range is not considered clean, the range will need to be re-washed until clearance samples are below 200 ug/ft².
- k. The regional industrial hygienist will do quality assurance sampling as needed.
- l After obtaining clearance, the walls of the range will be coated with a sealant (Not Paint), which is smooth, wood floors will receive a coat of deck enamel or urethane, concrete floors will be sealed with deck enamel. After sealing, floors will be tiled or covered with linoleum.
- m. As a variety of conditions exist in ranges, unique situations may arise and specific written guidance from the Regional Industrial Hygiene Office may be required.
- n. All personnel involved in the decontamination/conversion of IFRs as a minimum will be provided with the following personal protective equipment.
- (1). Full Face air purifying respirator with HEPA cartridges. The requirements outline in 29 CFR 1910.134, must be met prior to placing workers in respiratory protection.
 - (2). Individuals will be provided personal protective equipment as required per paragraph 2-5, this pamphlet.
- o. Any conversion must be supervised by a person certified to perform inspections, evaluations, and determinations of IFRs IAW with OSHA standards, other nationally accepted standards, and accepted IH practices for maintenance, cleaning, conversion, ventilation, and air sampling of IFRs. All work shall be according to current industry engineering standards under the control of the State Construction and Facilities Management Officer. Cleaning must recognize that there likely will be "background" lead presence in the readiness center totally independent of the existence of an indoor range and that the method of cleaning is less important than achieving the goal of less than 200 micrograms (40 micrograms in the case of child exposure).
- p. After conversion, lead testing shall continue on an annual basis to verify that no lead migration from the substrate is occurring.

**Appendix A
References**

**Section I
Required Publications**

There are no entries in this section

**Section II
Related Publications**

ASTM E1792-03
Standard Specification for Wipe Sampling Materials for Lead in Surface Dust

AR 11-34
The Respiratory Protection Program

AR 40-5
Preventive Medicine

DODI 6055.5
Industrial Hygiene and Occupational Health

DOD 6055.5-M
Occupational Medical Surveillance Manual

29 CFR, Part 1910
Occupational Safety and Health Administration, Department of Labor

National Institute for Occupational Safety and Health (NIOSH) 76-130
Lead Exposure and Design Considerations for Indoor Firing Ranges, Department of Health, Education and Welfare

NGR 385-15
Policy and Responsibilities for Inspection, Evaluation and Operation Army National Guard National Guard Indoor Firing Ranges (IFRs).

NGR 415-5
Army National Guard Military Construction Program Development and Execution

NGR 420-10
Construction and Facilities Management Office Operations

Technical Manual, 5th Edition
Occupational Safety and Health Administration, Department of Labor

**Section III
Prescribed Forms**

There are no entries in this section

**Section IV
Referenced Forms**

There are no entries in this section

**Appendix B
Protocol for Collecting Wipe Samples**

B-1. If multiple samples are to be collected at the work site, prepare a rough sketch of the area(s) or room(s), which are to be wipe sampled.

B-2. A new set of clean, impervious gloves should be used for each sample to avoid contamination of the media by previous samples and to prevent contact with the substance.

B-3. Wipe Samples

a. If using Ghost Wipes™, tear open the individually sealed package. Remove the moistened wipe. Unfold the wipe.

b. If using a dry media such as MCE or Whatman™ filter, moisten the filter with distilled or deionized water prior to sampling.

B-4. Place a 10 centimeter by 10 centimeter template on the area to be wiped.

B-5. Apply uniform firm pressure while wiping the area inside the template.

B-6. To ensure that all portions of the partitioned area are wiped, start at the outside edge and progress toward the center making concentric squares decreasing in size.

B-7. After collecting a sample, fold the filter or wipe inward and place into a container and number it. Note the number at the sample location on the sketch.

B-8. At least one blank filter treated in the same fashion but without wiping, should be submitted to the laboratory.

**Appendix C
Sampling Strategy for Collection of Wipe Samples**

C-1. Prior to cleaning the ranges, three samples must be collected and analyzed for total lead dust on each surface, i.e., floor, ceiling, bullet trap, and wall to include the plenum wall, if applicable. In addition, a total of three samples should be collected from areas which have been least disturbed by airflow. Established walkways should be avoided.

C-2. Samples should be collected from different areas of the range. A grid system should be utilized. Each range surface areas should be divided evenly into 3 by 3 sections. Samples should not be collected from only one section of a wall or end of the building.

Glossary

**Section I
Abbreviations**

ARNG
Army National Guard

CFR
Code of Federal Regulations

HEPA
High Efficiency Particulate Air

IFR
Indoor Firing Range

NIOSH
National Institute for Occupational Safety and Health

OSHA
Occupational Safety and Health Administration

ug/ft²
Micrograms per square foot

**Section II
Terms**

Air monitoring
The sampling for and measuring of pollutants in the atmosphere.

Breathing zone
The imaginary globe of two feet radius surrounding the head.

General area
Collection of and later analysis of airborne contaminants in a given work environment. As the sampling pump and collection media are not attached to a worker, the concentrations found represent average concentrations in that area but may not representative of the actual exposure of the worker.

HEPA
Refers to high efficiency particulate air filter systems capable of capturing up to 99.97 percent of particles 0.3 microns in size or larger.

Lead-Contaminated Range
It is assumed that all IFRs, which have been fired in, are lead-contaminated.

Respirator
A device designed to provide the wearer with respiratory protection against inhalation of airborne contaminants.

Wipe Sample
The terms wipe, swipe, or smear samples are used synonymously to describe the techniques utilized for assessing lead surface contamination.

3 November 2006

NGP 420-15

Section III
Special Abbreviations and Terms

This section contains no entries