


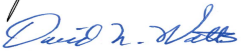


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STRUCTURE CLEANING PROGRAM: CLEANING PROTOCOL

East Palestine Train Derailment Response East Palestine, OH

Prepared on Behalf of:
Norfolk Southern Railway Company

	Name / Role / Company	Signature	Date Signed
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1.0 MANAGEMENT OF CHANGE

Change 001			
<i>Description of Change (include sections & page numbers):</i>			
	Name/Role	Signature	Date Signed
Prepared By:			
Approved By:			
Change 002			
<i>Description of Change (include sections & page numbers):</i>			
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Change 003			
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Glossary of Terminology

Cleaning – Refers to the removal of foreign material (e.g., soil, and organic material) from objects and is normally accomplished using water with detergents or enzymatic products.

Contact Surfaces – Refers to porous and non-porous material surfaces where direct human contact may be made. **High contact** refers to those surfaces with frequent human contact (e.g., by hand, face, arm). These include but are not limited to the following items or surfaces: bedding, towels, shared linens, handles, doorknobs, push plates, handrails, light switches, desktops, chairs, arm rests, tables, counters, kitchen and bathroom faucets, toilet seats and handles, and arm rests. **Low contact** refers to all other material surfaces where human contact may not exist or occur infrequently. These include, but are not limited to, floors, walls, stairs, underneath tables or chairs, ceilings, and light fixtures.

Structure – While generally defined as a building, with regards to the Structural Cleaning Program, will include only those habitable spaces where indoor occupancy is frequent and regularly occurring on a daily or near-daily basis. For example, this may include primary residences, commercial buildings currently in operations, etc. Generally, this will not include spaces used solely or predominantly for storage. Additionally, this definition will apply “within” structures as well, with spaces unfinished within structures / spaces within a structure solely / predominantly used for storage not considered part of the structure with respect to this program. This includes unfinished attics and basements, garages, exterior storage rooms, etc.

1.0 INTRODUCTION

This Structure Cleaning Program (herein referred to as “Program”) was prepared on behalf of Norfolk Southern Railway Company in support of the East Palestine Train Derailment that occurred at approximately 2100 Eastern Standard Time (EST) on February 3, 2023. A map of the site location is provided in **Attachment A**.

The incident involves a derailment and subsequent fire of rail cars, some of which contained vinyl chloride, 2-ethylhexyl acrylate, n-butyl acrylate, 2-butoxyethanol, isobutylene, ethanol (in the form of beer/malt liquor), lube oil, and various glycols.

The objectives of the proposed Structure Cleaning Program include:

1. To define the region eligible for receiving structure cleaning,
2. To provide an overview of the process for requesting structure cleaning,
3. To establish the elements of this program, both pre- and post-cleaning,
4. To establish the cleaning scope of work to be carried out within each structure, and
5. To define the endpoints of the cleaning program.

Cleaning services will be made available for the entire Village of East Palestine, anyone currently relocated by NS, and the entire 1-mile by 2-mile evacuation zone. Prioritization will be given to those that have been relocated and wish to return before construction is complete.

2.0 PROGRAM ANNOUNCEMENT, TIMING, AND SCHEDULING PROCESS

EPA will develop an outreach strategy to announce this program to property owners/tenants who are interested in having their home/office cleaned. It should be noted that the Program is being established as completely voluntary and complementary service with no indication of surface impact, and therefore cleaning will be performed on a “by request” basis.

It is anticipated that a 30-day enrollment period will initiate the Program, beginning with the aforementioned outreach strategy, as well as intake and scheduling. Operational activities (i.e., cleaning) will likely begin after a 2-week outreach period and will coincide with a reduction in both soil removal operations and the response footprint. Intake and scheduling will continue for approximately 15 days following initiation of post-operations, and the enrollment period will conclude with a “last call” outreach push on the final days of enrollment. This timeline is subject to change depending on levels or participation in the program. The last day to inform the EPA of interest in the program will be September 5, 2023.

U.S. EPA and/or their representatives will make up the Hotline Team who will provide telephone support to citizens who call the on-site hotline number Monday-Saturday, 8:00 AM to 8:00 PM Eastern. The hotline will be closed on Sundays. On Sundays and after hours, citizens may leave a voicemail message, with the Hotline Team returning the call the next day.

The Hotline team will complete an intake form to gather information from the property owner/tenant including name, address, and contact information to schedule the Pre-Cleaning Interview. The Hotline team will collect the date and time of the call and assign a Property Identification (PID) Number to the property/structure to facilitate record-keeping and protect the privacy of the resident. EPA will then relay this information to NS and their contractors to participate in the Pre-Cleaning Interview.

3.0 CLEANING PROCESS

Cleaning of structures will begin with a pre-cleaning interview and documentation to gather information from the property owner/tenant, and end with a post-cleaning evaluation and completion sign-off by applicable parties. While each scope of work may vary based on the structure itself, in general, cleaning will include both porous¹ and non-porous surfaces. For ease of review, each of these topics are presented below.

3.1 Pre-Cleaning Interview

Once a request for structure cleaning has been received by the Hotline Team and an interview has been scheduled, representatives of the interview team, including EPA, EPA contractors and NS contractors, will perform a pre-cleaning interview. The purpose of these interviews is to explain the cleaning program, obtain access for program personnel to enter the home to perform necessary tasks, and help the property owner/tenant complete the necessary forms. The interviews also provide the opportunity to get to know the residents and let them know who is available to help them through this process. Interviews will be scheduled Monday through Friday. Weekend interviews may be scheduled if residents are not able to meet during the week. Residents will be able to sign up for scheduled times. No interviews will be conducted past 6:00 PM, unless the residents are unable to attend during normal hours of operation.

During this interview, the interview team representatives will:

- Complete the Pre-Cleaning Interview form (**Attachment B**) to gather information from the property owner/tenant including name, address, contact information, and if they are interested in the cleaning service,

¹ Laundering practices will be presented in this document with the intent to provide best practices to residents, business owners, or property owners. NS does not intend to launder materials on behalf of residents, business owners, or property owners.

- Provide owners/tenants with an agreement for EPA, NS and their contractors and any other program personnel to perform all the tasks described in this document,
- Require that the owner/tenant sign the access agreement (**Attachment G**) prior to cleaning to be scheduled,
- Discuss the property and cleaning activities with the resident,
- Relay specific residents' needs to the Cleaning Operations Support Team,
- Provide a few boxes for clearing surfaces (if required),
- Collect information needed to generate a scope of work, and
- Determine crew size and estimate a completion timeline.

During this process, the interview team will also document any barriers (such as items within the structure) to performing cleaning. The representative will inform the resident, business owner, or property owner that they will not move appliances on their behalf as part of the cleaning process. Cleaning under / tops of furniture and/or appliances will be done using a long-ranged cleaning tool where accessible. The team will ask the resident to call attention to any items, especially fragile, sensitive, or valuable items, that should be boxed up / removed prior to cleaning.

Several electronic forms, applications and information documents have been developed by NS and the EPA to document the cleaning process and provide information to the residents/property owners. During the interview, these forms will be explained, and the appropriate signatures will be obtained. A copy of the forms will be provided to the resident upon request. EPA / their contractors will have Bluetooth printers available for printing in the field.

The property owner/tenant will also be advised to maintain a file of all documents involving their cleaning.

The property owner/tenant will also be asked to review and sign a cleaning access agreement during the interview process. Interview team members will obtain consent from residents to have the building's interior cleaned, as well as photo and video documentation obtained of the building's interior during the cleaning process.

If at any point in the process the property owner/tenant wishes for additional time to review documents the cleaning scheduling for the property will be put on hold. The property owner/tenant will still be allowed to participate in the program at a later date should they agree to sign all needed documentation as long as the program has not reached its conclusion by that time.

3.2 Pre-Cleaning Inspection

Immediately prior to the start of cleaning, a pre-inspection team, including an EPA representative and/or an EPA contractor and NS representative(s), will conduct a pre-cleaning inspection of the property/structure. The number of teams will be sized to the program needs. Staffing may be adjusted based on the property and schedule. Documentation is extremely important and the pre- and post-cleaning conditions at each building will be documented thoroughly. Responsibilities include:

- Documenting the date/time for pre-cleaning inspection corresponding to the PID number assigned to the property/structure.
- Taking photographs/video² of the building interior, documenting its current disposition, prior to cleaning beginning. **This will be a requirement for participation in the program.**
- Ensuring broken, damaged, and high value items are accurately captured and documented through photographs/video.
- Determining the functional status of all major appliances, faucets, and drains via the Home Inspection Checklist (**Attachment D**).
- Uploading the database with all photographs, videos, additional documents, and signed forms.
- Ensuring documents and photographs/videos are tagged with their PID number.
- Reviewing the database for accuracy once a pre-inspection is complete.
- Completing the Interior Pre-Cleaning Inspection Form (**Attachment C**).

3.3 Cleaning Procedures

PPE and Hygiene Practices

Cleaning activities must begin with proper personal protective equipment (PPE) and Hygiene practices performed by cleaning personnel. At a minimum, cleaning personnel will be required to wear:

- Company identification / uniform,
- Safety Vest
- Disposal boot covers (when inside the home),
- Disposal, nitrile gloves (when appropriate for the task), and
- Other PPE as required in the scope of work.

Cleaning personnel must use all prescribed PPE following OSHA regulation [29 CFR 1910.132 – General Requirements](#) and all other applicable regulations contained in [29 CFR 1910 Subpart I – Personal Protective Equipment](#).

² Audio will be enabled thoughtfully when videos are collected, only utilizing audio to add necessary context.

Cleaning personnel should also employ good hygiene practices during the cleaning process, to include proper donning / doffing of PPE, avoiding touching eyes, nose, and mouth with unwashed hands, and practicing hand hygiene upon doffing gloves. PPE should be discarded as contactors are vacating properties. Additionally, no eating, drinking or smoking will be allowed inside the home/office during the cleaning process.

Cleaning Objective and Key Guidelines

Cleaning teams will consist of NS contractors and/or NS subcontractors. Responsibilities include:

- Conducting thorough cleaning of structures using, at a minimum, the Interior Cleaning Activities Checklist (**Attachment E**). This will include, wet-wiping accessible horizontal hard surfaces, wet mopping floors, HEPA vacuuming floors, carpets and appropriate/applicable soft surfaces, and dry dusting appropriate/applicable vertical surfaces.
- Teams will not open cabinets, drawers, or private spaces for cleaning. Additional private spaces will be as defined by the owner/occupant.
- Teams will not move appliances. Cleaning under / tops of furniture and/or appliances will be done using a long-ranged tool where accessible.
- Teams will not attempt to clean closets, unless there is no door. Although, nothing will be moved or removed.
- Teams will not wash clothing or touch personal items. This will be the responsibility of the owner/occupant.
- Teams will wear approved personal protection equipment (PPE) in accordance with this document. PPE will be donned either inside or just outside the structure.
- Teams will immediately contact the EPA or their direct supervisor to notify EPA if the media or other third party becomes involved with a cleaning or approaches the contractor with questions (See **Section 4.3** for more details).
- Teams must be aware that a documentation team will be capturing the cleaning process. EPA staff and their contractors will be monitoring the cleanup activities closely.

Non-Porous Surfaces

Non-porous means that it is an item or surface that does not allow liquid or air to pass through it. These surfaces often are smooth, having no pores or holes, and is impervious or not penetrable.

High Contact Non-Porous Surfaces³

High-contact, non-porous surfaces will be cleaned using a mild detergent appropriate for the surface. Typically, the recommended application method includes a hand wiping motion, ensuring all contact

³ At this time, electronics will not be included in the program outside of light dusting, when appropriate/applicable.

surfaces are adequately touched through the wiping process. General best practices for these types of surfaces are presented below:

- Use clean, soft cloths liberally and replace the cloths once visible dirt and soiling has occurred.
- If present, inform the resident, property owner, or business owner to wash soiled dishes and utensils in a dishwasher with detergent and hot water or by hand with hot water and dish soap.

Low-Contact Non-Porous Surfaces

Surfaces such as hard flooring (i.e., sealed hardwoods, hard vinyl, tile, or other hard flooring); metal, smooth glass, ceramic, porcelain, sealed concrete, or non-porous walls may be addressed by cleaning personnel as an additional surface addressment measure. If identified in the scope of work, general best practices for these types of surfaces are presented below:

- Clean all relevant hard flooring areas using a mopping or wiping motion with a mild detergent appropriate for the surface.
- A fogger/sprayer may be used for broad application of detergent onto flooring, walls, furniture, and other non-porous surfaces. Avoid excessive application of spray to prevent damage to electronics or physical damage to sensitive materials.

3.4 Porous Surfaces

Something that is porous has many small holes, so liquid or air (or gas) can pass through. These items and surfaces are permeable. If you can use words such as cranny, sponge-like, dint, leaky, hollow, nook, tear, pinprick, etc. to describe an item or surface, then it is porous.

Launderable Materials

While NS does not intend to launder materials on behalf of owners/tenants, cleaning personnel will inform the resident, business owner, or property owner of recommended laundering practices for clothing, linens and bedding materials, towels, etc. These practices include:

- Handle soiled laundry according to standard practices,
- Wash laundry in a standard washing machine with detergent, following label instructions and utilizing the warmest, recommended temperature.
- Dry items completely.

High-Contact Non-Launderable Porous Surfaces

For surfaces such as carpets, regularly utilized / high contact upholstered furniture⁴, rugs, etc., vacuuming or utilizing products appropriate for the surface should be considered. If utilizing a vacuum cleaner, a high efficiency particulate air (HEPA) filter should be equipped. Cleaning of the vacuum cleaner between structures is not required when a HEPA filter is properly installed and remains intact during use, but the HEPA filter should be changed between structures. The potential of damaging the porous surface should be considered when choosing a cleaning technique.

Low-Contact Non-Launderable Porous Surfaces

If low-contact porous surfaces are identified in the scope of work to be addressed, use a surface-appropriate detergent.

3.5 Disposal of Waste

Any waste, dirt, soil rags and cloths, etc. must be disposed of safely and properly in accordance with the scope of work developed and the product utilized. At a minimum, this must include any waste generated by cleaning personnel being appropriately transported to an offsite location for disposal.

3.6 Post-Cleaning Evaluation and Sign-off

Immediately (i.e., prior to crews leaving the premises) upon the completion of cleaning, a post-cleaning evaluation will occur, and the cleaning will be inspected by representatives of the cleaning program to include the EPA or their representative, property owner/tenant and NS or their representative. Responsibilities include:

- Documenting the date/time for post-cleaning evaluation corresponding to the PID number assigned to the property/structure.
- Taking post-cleaning photographs/video after the cleaning is complete.
- Updating the database with all photographs, videos, additional documents, and signed forms.
- Ensuring documents and photographs/videos are tagged with their PID number.
- Reviewing the database for accuracy once a cleaning is complete. These items will be handled as confidential and will not be shared or reproduced in any way.

In the event that cleaning is deemed inadequate, cleaning crews will be re-mobilized to address surfaces of concern, or to conduct a more thorough cleaning as necessary.

⁴ This is meant to encompass items such as couches, recliners, dining chairs, and other upholstered furniture where frequent use and contact occurs. This is not meant to encompass upholstered bedframes, antiques, or other items that are infrequently contacted.

After cleaning has been deemed adequate, a U.S. EPA representative will accompany NS and their contractors to the home to verify cleaning has been completed. The owner/tenant and NS will sign the Post Cleaning Sign-Off Form (**Attachment F**). If the cleaning is insufficient, this information will be noted, and additional cleaning services will be arranged.

4.0 SPECIAL SITUATIONS

4.1 Commercial Structures

While the program and its elements are largely geared towards residences, the cleaning of commercial structures that fall within the boundaries of the program will be considered on a case-by-case basis. It should be noted that commercial properties will require specific scopes of work, unique schedules, etc. as the cleaning activities that will be required in each will be specific to the structure itself and how it is used and may include processes not specifically called out in this document. However, if a commercial structure is deemed eligible for the program, appropriate cleaning procedures will be followed for the type of business / activities that occur within the structure and those processes will be noted on the developed scope of work.

4.2 Homeowner Assistance

At times during the program, the EPA, NS, and their contractors may encounter owners/tenants or structures that involve accommodations beyond the scope of this program. While not meant to be an all-inclusive list, some of these inquires may include:

- Furnace Filter Replacement,
- Exterior Cleaning,
- Temporary child or pet care, and
- Duct Cleaning.

Based on several factors, including feasibility, timing, current location of the homeowner, etc., NS will consider reimbursing owners/tenants through the Family Assistance Center for accommodations such as these. Applicable owners/tenants will be provided with details on how to contact the Family Assistance Center to inquire about accommodations when appropriate.

4.3 The Cessation of Cleaning / Reduction of Scope Triggers

Triggers have been established that, if met at any point during the Program, will result in the Cessation of Cleaning or a reduction of the scope of work (whichever is appropriate). These Triggers include:

- Rodent Infestation
- Visible Illegal drugs / drug paraphernalia

- Unsecured Firearms
- Presence of anyone other than the Owner/Tenant at the property during cleaning
- Presence of Media or other third parties at interviews or inspections (whose presence was not approved prior to by the EPA)
- Unsanitary Conditions (to the extent they could result in a worker health hazard / they are above and beyond the scope of the Program)
- Tenant/ Owner disposition
- Any other condition of the structure (excessive cluttering, unsafe conditions, etc.) as deemed by the EPA to be above and beyond the scope of the Program.

Should any of these Triggers be met at any time during the Structural Cleaning Program, the EPA will notify the owner/tenant that the program will not be moving forward with their structure until conditions are met to remedy the situation. If these conditions are not met by the time of program conclusion, the owner/tenant's structure will be removed from the program.

5.0 CLEANING DOCUMENTATION

NS will store all documentation in an appropriate manner and provide all documentation obtained during the cleaning process to EPA. EPA will maintain a file for each building/structure that is cleaned and will provide any files to NS that they do not already have a copy of in a safe, secure manner that protects personal identifiable information upon request.

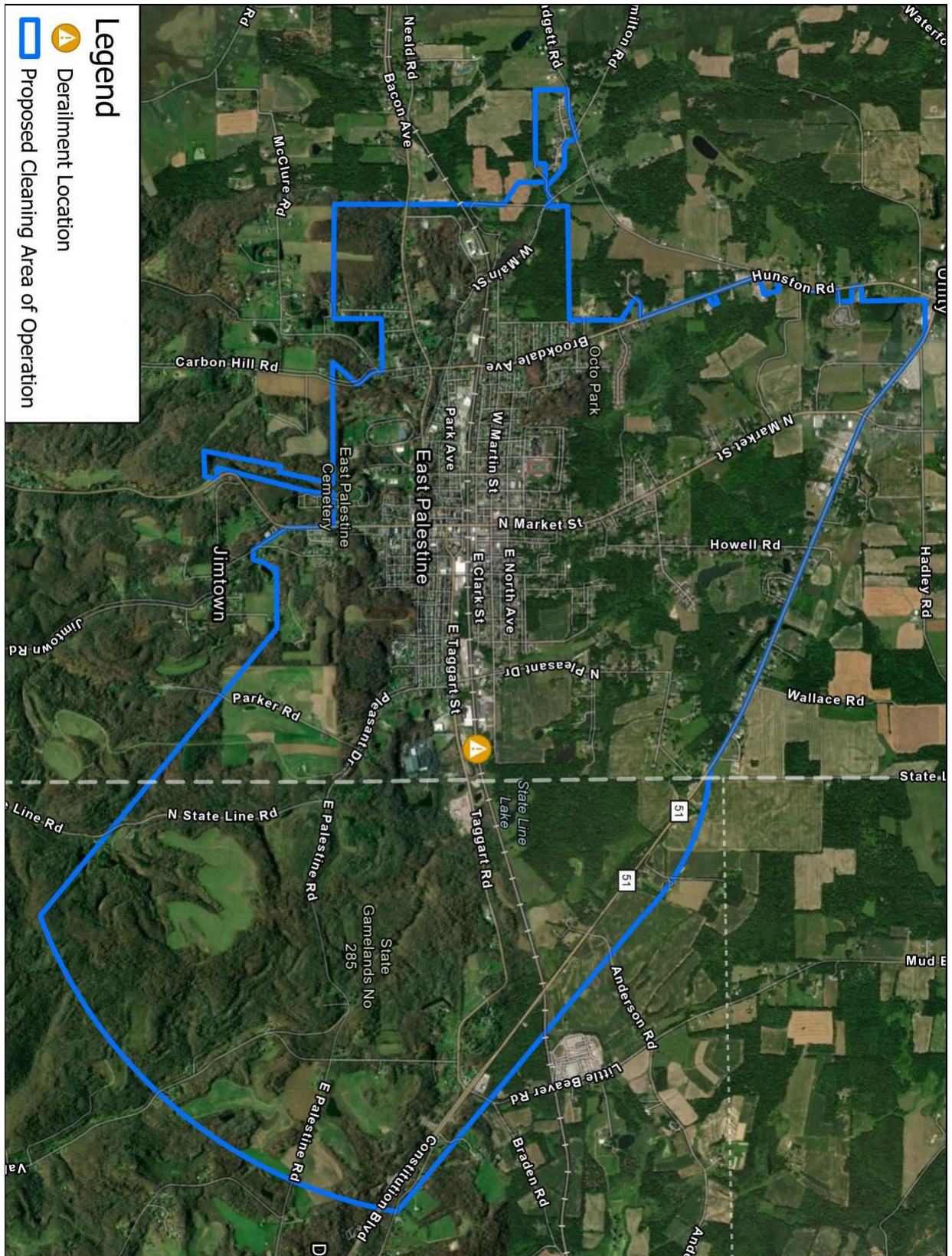
While specific documents may vary between structure files based on the nature of the file, the documents logged in each structure file will be those necessary to tell the story of each structure and its journey through the program. Examples of documents expected to be maintained in each file include:

- Initial Call Survey / Interview
- Pre-Cleaning Interview (**Attachment B**)
- Interior Pre-Cleaning Inspection (**Attachment C**)
- Home Inspection Checklist (**Attachment D**)
- Interior Cleaning Activities Checklist (**Attachment E**)
- Post Cleaning Sign-off Form (**Attachment F**)
- Access Agreement (**Attachment G**)
- Memos to document any change eligibility status (e.g., as a result of birth or decease of a household member)
- Videos, photographs and other documentation from the cleaning process

Each property is identified by a PID number to facilitate recordkeeping and protect the privacy of the owner/tenant.

Attachment A

Site Map



Structure Cleaning Program
 Taggart Road Incident – East Palestine, OH
 August 9, 2023

Attachment B

Pre-Cleaning Interview Form

Pre-Cleaning Interview

Property ID: _____

Consent for Entry and Access to Property

Completed by: _____

Date: _____

Property Owner/ Tenant Name: _____

Scheduled Cleaning Date and Time: _____

Notes and Scope Definition: _____

Special Circumstances: _____

Attachment C

Interior Pre-Cleaning Inspection

Interior Pre-Cleaning Inspection

Inspector: _____ Property ID# _____

Address: _____

Date: _____

Item #	Item	Observation
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		

Notes:

Property Owner / Tenant (Print /Signed): _____

Date: _____

NS/ NS Representative (Print /Signed): _____

Date: _____

EPA Representative (Print): _____

Date: _____



Attachment D

Home Inspection Checklist

Home Inspection Checklist

Property Address: _____

Applicant Name: _____ Property ID: _____

Date/Time: _____

Item	Pre-Cleaning Status				Post-Cleaning Status		
	Working	Broken	N/A		Working	Broken	N/A
Water Heater							
Refrigerator							
Stove							
Microwave							
Heater							
Air Conditioner							
Kitchen Sink							
Bathroom Sink 1							
Bathroom Sink 2							
Shower/Bathtub 1							
Shower/Bathtub 2							
Toilet 1							
Toilet 2							
Living Room TV							
Bedroom 1 TV							
Bedroom 2 TV							

Property Owner / Tenant (Print /Signed): _____

Date: _____



NS/ NS Representative (Print /Signed): _____

Date: _____

EPA Representative (Print): _____

Date: _____

Attachment E

Interior Cleaning Activities

Interior Cleaning Activities

Property Address: _____

Applicant Name: _____ **Property ID:** _____

Date/Time: _____

Surface Type	Method of Cleaning	Y or NA
Tables	Wet	
Floors	Wet	
Kitchen Surfaces (countertops and other touchpoints)	Wet	
Bathroom Surfaces (countertops and other touchpoints)	Wet	
Tabletops	Wet	
Bureaus Tops	Wet	
Bookcases	Wet	
Shelves	Wet	
Windowsills	Wet or HEPA	
Door Jams	Wet	
Chairs	Wet	
Picture Frames	Dry or HEPA	
Ceiling Fan / Box Fan	Dry or HEPA	
Window Blinds	Dry or HEPA	
Window Shutters	Dry or HEPA	
All Door handles / knobs (front, back, interior)	Wet	
Floor Mats	Wet or HEPA	
Area Rugs	HEPA	
Upholstered Furniture (when applicable)	HEPA	
Wall-to-Wall Carpeting	HEPA	
Air Vents	Wet or HEPA	
Air Registers	Wet or HEPA	
Toys (when applicable)	Wet or HEPA	
Photos of Cleaning Activities	Camera / Video	
Pests Visible?	Yes ___ No ___ N/A ___	

Notes:

- Wet Cleaning - Procedure using a solution that includes a cleaner to remove surface and embedded dust from targeted hard and soft surfaces.
- Cleaning will only be performed on accessible horizontal surfaces.
- If dust levels are excessive prior to the wet cleaning, HEPA vacuuming may be used prior to the wet cleaning process.

NS Representative (print): _____

Attachment F

Post Cleaning Sign-off

Post Cleaning Sign-off Form

Property Address: _____

Applicant Name: _____

Property #: _____

Date/Time: _____

Number of rooms cleaned _____

Cleaning Contractor: _____

	Yes	No	N/A
1. No personal items or property were damaged/destroyed during the cleaning of the structure. If no, please add comments below.			
2. All items that were listed on the scope of work were completed? If No, please add comments below.			
3. Are there any issues at all? If yes, please add comments below.			

Comments: _____

As the owner / tenant of _____

I agree with the statements above, and I acknowledge that cleaning of the property identified on this form was completed appropriately and to my satisfaction. I give this acknowledgement voluntarily on behalf of myself and all other co-owners and/or co-tenants of this property:

Property Owner / Tenant (Print /Signed): _____

Date: _____

NS Representative (Print /Signed): _____

Date: _____

EPA Representative (Print): _____

Date: _____

Attachment G

Access Agreement

CONSENT FOR ACCESS TO PROPERTY
FOR STRUCTURE CLEANING PROGRAM

Date: _____

Full Address: _____
("Property")

Phone Number: _____

I, _____, the legal and rightful owner or occupant of the Property, consent and hereby authorize Norfolk Southern Railway Company, its contractors, environmental professionals, including [CTEH, LLC] and assisting local, state, and federal agencies, including but not limited to the United States Environmental Protection Agency (U.S. EPA) to enter and have continued access to the Property to conduct the activities set forth in the Structure Cleaning Plan. Those activities include accessing the property, a pre-cleaning assessment, photographing and videoing the Property, wiping, vacuuming, dusting, and other cleaning of surfaces, and a post-cleaning assessment.

This written consent is given by me voluntarily, on behalf of myself and all other co-owners and/or co-tenants of this Property, with knowledge of my right to refuse and without threats or promises of any kind.

Signature: _____

Printed Name: _____

Date: _____

I **do not** consent to above access to my property and understand that my refusal of consent withdraws me from participation in the Structure Cleaning Program.

Signature: _____

Printed Name: _____

Date: _____