

COMMON QUESTIONS AND CLARIFICATIONS REGARDING ASBESTOS CEMENTITIOUS FLOOR TILE (ACFT) ISSUES

Issued To: Asbestos Abatement Contractors, Consultants, Air Samplers, Training Providers

Issued From: M. Jean Wheeler (Hayes)

Issued: March 20, 1998

#1) What is the Departments' position on using machines which buff or grind asbestos-containing mastic, glue or adhesive from the floor?

Response: Using a buffer/grinder on surfaces coated or treated with mastic, glue and adhesives will generate a friable dust when the exposed asbestos layer or surface is subjected to rotary action created by the buffer or grinding machine. Therefore, abatement activities involving such methods will be considered regulated and subject to all applicable State and federal regulations. Also, caution should be exercised during routine buffing of ACFT which may not be intended for abatement.

#2) What do asbestos-containing floortile and 'quarter sized chips' have in common?

Response: This phrase appears to have become common in the abatement industry and the Department is not sure of the exact origin. We can, however, infer that the phrase may have been intended to give regulated sources a gauge on what size constitutes regulated/friable floortile. The Department cautions relying on this information when deciding friability and as a rule abstains from endorsing a diameter or measurement for floortile breakage.

#3) Would you express the Departments' position on the use of tools such as shovels, spud bars etc., to scrape ACFT from its substrate?

Response: It continues to be our ongoing experience that, where ACFT is removed utilizing shovels, spud bars, or other scrapping tool, the floor tile becomes regulated. Owner/Operator should anticipate this and notify accordingly.

#4) In reference to ACFT what is meant by the "four-break rule"?

Response: The Department does not know the exact origin of this phrase. However, we have concluded that it probably derived from #2 above. The phrase did not originate from within the Department and its interpretation is misleading.

#5) Does saturating ACFT with water prevent it from becoming regulated?

Response: No. [Amended] Water is added to a material to prevent asbestos dust emissions, not friability. Applying water to ACFT prior to removal may, however, loosen

the adhesive that holds tiles in place thereby assisting with the ease with which tile are extracted from the substrate.

#6) Does this mean that I cannot break a ACFT at all?

Response: No. For years the Department has indicated that it would be illogical to assume that some breakage will not occur during removal. In fact, breaking a tile in two or four pieces would not be an indication of friability, however, what would be an indication that the floortile is or has become regulated/friable is when the flooring is coming up in chips or crumbles.

The above determinations are intended solely for clarification and do not replace or alter existing regulatory language. The Department appreciates the opportunity to clarify these issues.