ADVISORY NO. 3.7: ASBESTOS FLOOR TILE AND MASTIC REMOVAL ABATEMENT PROGRAM PLAN

Floor tile and mastic when found to have Asbestos Containing Material (ACM) is classified under National Emission Standards for Hazardous Air Pollutants (NESHAP) (Federal Register, Volume 55, Number 224, November 20, 1991) as Category 1 non-friable Asbestos Containing Material (ACM) in its passive state. All asbestos containing floor tile and mastic must be inspected and tested for friability before renovation or demolition commences. If the ACM is in poor condition and friable (reduced to powder by hand pressure) it is to be considered as a Regulated Asbestos Containing Material (RACM) and must be handled in accordance to NESHAP.

If Category 1 non-friable ACM will be or is subjected to sanding, grinding, cutting, or abrading during the course of removal it is also to be considered as regulated ACM and is to be removed under all regulations and notifications. All waste disposal standards apply.

Environmental Health & Safety (EH&S) requires that all abatement of ACM floor tile over 3 square feet within the project, regardless of friability be performed by a asbestos contractor. Small-scale removal can be removed by trained in-house personnel up to 3 square feet. This is to prevent excessive breakage and fiber exposure to workers and occupants.

OSHA states that before a contractor begins full scale removal of material initial monitoring should be performed to record if exposure meets or exceeds the Permissible Exposure Level (PEL) of 0.1 fibers/cc or the Excursion Limit (EL) of 1.0 fibers/cc (if data exists from another previous identical job it is to be supplied to Environmental Health & Safety before activity begins). When airborne concentrations exceed the PEL or EL then respirators and protective clothing must be worn. If levels cannot be reduced below the PEL or EL then a negative-pressure enclosure must be erected around the area (exemption: small-scale, short duration abatement). OSHA states that a competent person is required on site. No cutting or breaking of tiles may be done without an enclosure. Preferred methods for floor tile removal are the use of heat, flooding of water (if possible), vacuum lift and/or dry ice to pop the tiles.

ASBESTOS FLOOR TILE ABATEMENT PROCEDURES:

- All workers medical and training documents are to reviewed by EH&S prior to any activity.
- All Material Safety Data Sheets (MSDS) are to be reviewed by EH&S prior to any activity.
- Floor tile mastic that is positive for asbestos is to be removed with an approved mastic remover under a HEPA ventilated enclosure to minimize odor.
- All workers are to wear respirators (combination carbon/HEPA filters for mastic removal) and protective clothing.
- Regulated areas must be demarcated and have restricted entry to authorized persons only.
- As stated previously, the preferred method for removal is: the use of heat, vacuum lift, dry ice, and/or flooding of water (if possible) to pop the tiles, if floor tile is in poor condition and friable an enclosure is needed for large-scale projects.
- All material is to be disposed into doubled polyethylene clear bags and temporarily stored in an approved location per EH&S. Final disposition will be handled by Environmental Health & Safety.

Adv. 3.7: **Asbestos Floor Tile and Mastic Removal Abatement Program Plan** 01-26-05