

TECHNICAL BULLETIN

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FROM: David Gandee

SUBJECT: Clearance Monitoring for Asbestos-Containing Floor Materials

In the EPA's 100 Commonly Asked Questions about the New AHERA Asbestos-In-Schools Rule, it is stated that, "if the floor tile or its adhesive material does not become friable during the removal process, it is not a response action." AHERA clearance monitoring is only necessary for response actions associated with friable asbestos-containing building materials. Therefore, unless floor materials become friable before or during removal, clearance monitoring is not required under AHERA.

It is G&A's view that while floor materials may be broken during removal, seldom does the material become friable. Even though the floor material does not become friable and is not a response action under AHERA, all floor material work areas will be cleared through phase contrast microscopy regardless of the quantity of material being removed.

As an additional note associated with mastic removal projects, we have found that mastic removal agents often damage floor moldings or their adhesive. Replacement of these moldings should be discussed with the Owner prior to the Work. We are currently revising our project manual to include removal of moldings as part of a floor material abatement project.