

Felt Tips

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The following is not to be treated as legal information, and is just for your general information.

New Resilient Flooring Work Practices

Okayyy, so much for disclaimers! Why a disclaimer, you ask? We're going to discuss the "A-word". Yes! **Asbestos**. Asbestos in resilient flooring. Specifically, the removal of resilient flooring containing asbestos.

The following information is culled from the Resilient and Floor Covering Institute's November 1992 "Update on Recommended Work Practices and Exemption from OSHA Initial Monitoring Requirement."

The Resilient Floor Covering Institute (RFCI) has recently (November 1992) issued an updated booklet entitled "Recommended Work Practices (RWPs) for the Removal of Resilient Floor Coverings." The booklet discusses acceptable methods and procedures for removing resilient flooring and asphaltic cutback adhesive, regardless of whether they contain asbestos.

According to RFCI, based upon studies by ENVIRON Corporation, OSHA has acknowledged that initial air monitoring may not be required under certain circumstances. The exemptions require strict documentation, project procedures, and record keeping. Make sure you keep using those HEPA vacuums, 6 mil polyethylene bags, asbestos warning labels, and other stuff. When removing flooring, remember to heat the flooring (with a hot air blower or radiant heat source) until the heat penetrates the flooring and softens the adhesive. Removal of adhesive can be accomplished with a "mop on, mop off, no machine scrub" stripping solution; a floor machine with rubbing pad (keeping the floor continuously wet!); wet vacuuming the adhesive slurry with a HEPA vacuum; rinsing the floor with clean water; and revacuuming.

RFCI also has instructions and forms available for claiming an exemption from the need to conduct initial air monitoring under the U.S. Occupational Safety and Health Administration (OSHA) asbestos standard when removing asbestos-containing resilient flooring. A provision to use of the waiver is compliance with the RWPs. Remember not to disturb the flooring by sanding, grinding, abrading, sawing, drilling, chipping, and making it friable, otherwise you have to comply with the Environmental Protection

Agency's Asbestos Hazard Emergency Response Act and National Emission Standard for Hazardous Air Pollutants for Asbestos.

Maryland is one of 36 states where the removal of nonfriable asbestos-containing resilient flooring generally can be removed using RWPs, without the need for personnel to have an asbestos abatement license or worker certification (with the exception that removal work in schools must use licensed asbestos abatement personnel). The State of Virginia requires personnel have a special flooring license and/or special RWP training course for personnel removing resilient flooring using RWPs; the training course is for a Roofing, Flooring, and Siding license; removal work in schools must use licensed asbestos abatement personnel; and 20 day notification to the state's Department of labor and Industry. The District of Columbia and State of Delaware "require or may require" [the RFCI wasn't specific] licensed asbestos abatement contractors to remove asbestos-containing resilient flooring.

Remember [here we go again, another weasel statement], if you contemplate the removal of resilient flooring covering which does contain (or is assumed to contain) asbestos, you are solely responsible for determining the applicable regulations with which you must comply.

For additional information, RWP booklets and addenda, Instructions and Claim Forms for the OSHA initial monitoring exemption, and the ENVIRON study dated May 1, 1992, contact:

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