CITY OF PHILADELPHIA
DEPARTMENT OF PUBLIC HEALTH
PUBLIC HEALTH SERVICES
AIR MANAGEMENT SERVICES

TO: All Interested Parties **Date: February 23, 1998**

FROM: Ed O'Neill, Operations Manager, Asbestos Control Unit EON

SUBJECT: VINYL ASBESTOS FLOOR TILE & MASTIC ABATEMENT PROJECTS

The City of Philadelphia's Asbestos Control Regulations (ACR) regulate friable asbestos abatement projects. **Effective immediately**, all floor tile and mastic projects will be considered friable asbestos abatement projects unless the abatement contractor submits an alternative abatement plan. Air Management Services (AMS) approval of the alternative method is required prior to the start of each project.

Typical floor tile removal methods such as mechanical chipping (hand or machine) result in the floor tile being broken up into numerous small fragments. Mastic removal by mechanical (shot blast) methods has similar results. These removal methods render the floor tile or mastic materials friable and will be subject to ***ALL*** of the requirements of the ACR and the U.S. EPA NESHAP, including permits and an independent asbestos project inspector for major projects, air monitoring, work area preparation standards, and disposal requirements.

Contractors may apply for alternative removal methods and submit with the notification a non-friable removal work plan prior to project start up. Work plan methods must include the use of ***heat from infrared machines,*** or ***building a dyke and flooding with water***, or the use of ***dry ice or liquid nitrogen*** for floor tile removal or ***chemical applications*** for mastic removal. These methods when properly utilized allow the tiles and/or mastic to be removed with minimum damage and would not be subject to the ACR. AMS must review and approve each abatement plan and alternative method request for each project prior to the contractor starting the project. If the undertaking is approved by AMS as a non-friable project the notification and worker certification requirements apply. The contractor must ensure that the material remains non-friable during removal and disposal. Critical barriers and clearance air sampling are strongly recommended and should be listed on the alternative method request.

Other federal, state, and local requirements may also apply. If you have any questions please call (215) 685-7576.