



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 8 1991

OFFICE OF  
AIR AND RADIATION

Michael P. McGill  
Environmental Management Inc.  
1008 S. Santa Fe  
Wichita, Kansas 67211

Dear Mr. McGill:

This is in response to your October 23, 1990 letter requesting approval from EPA for the dry removal of floor tile which is preheated by infrared heaters.

The emission control requirements in § 61.145, including adequately wetting, apply to friable asbestos containing material (ACM). In a February 23, 1990 memorandum (attached) EPA clarified the requirements of the Asbestos NESHAP regarding nonfriable ACM, including floor tile. In that memorandum we stated that if the nonfriable ACM is subjected to sanding, grinding, burning, or abrading as part of demolition or renovation, then the nonfriable ACM must be handled in accordance with the NESHAP.

We do not believe that the use of infrared heaters alone on floor tile which is in good condition will damage the material such that it is crumbled, pulverized or reduced to powder. However, it would also be necessary to consider any additional operation which is used to remove the preheated floor tile from the floor. If the entire removal process does not subject the floor tile to sanding, grinding, burning or abrading it would not be necessary to adequately wet the floor tile. Floor tile which is in poor condition, indicated by peeling, cracking, or crumbling of the material, must be tested for friability. If the material is friable it must be handled in accordance with the Asbestos NESHAP. This determination does not apply to floor tile mastic. The condition of the mastic and the method of removal would have to be considered in order to determine if it would be subject to the Asbestos NESHAP.

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This determination has been coordinated with EPA's Emission Standards Division. If you have any further questions, please contact Scott Throwe of my staff at (703) 308-8699.

Sincerely,

A handwritten signature in cursive script, appearing to read "John B. Rasnic".

John B. Rasnic, Acting Director  
Stationary Source Compliance Division  
Office of Air Quality Planning and Standards