

WISHA Interim Interpretive Memorandum
Washington Department of Labor and Industries
#97-7-G
MECHANICAL REMOVAL OF ASBESTOS-CONTAINING FLOOR TILE

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Background

The Department of Labor and Industries has recently reviewed the use of a stationary flat blade attached to a motorized vehicle in the removal of vinyl asbestos floor tile and mastic. This abatement process removes floor tile by providing a large vertical force on the front blade which forces the blade under the floor tile as the vehicle moves forward. The blade's activity area is continuously misted with water. The blade does not rotate, has a relatively smooth non-abrasive surface, and is substantially similar to manual removal of tile and mastic.

The department's review has concluded that there is sufficient objective data and information available to determine the appropriate control measures and work practices for the use of such a mechanically-propelled stationary flat blade in the removal of vinyl asbestos floor tile and mastic.

This interim memorandum, which will remain in effect until a more formal directive can be issued, provides guidance to WISHA consultation and compliance staff regarding the appropriate application of the negative pressure enclosure requirements to such operations.

Policy

1. WISHA staff must enforce the requirements of a class II asbestos operation in relation to the use of a mechanically-propelled stationary flat blade (such as that described above) in the removal of vinyl asbestos floor tile and mastic. If these requirements are met, the manufacturer's recommendations are followed, and no significant exposure is documented by the CSHO or consultant, the requirement for a negative pressure enclosure when engaged in mechanical asbestos removal must be treated as *de minimis*. The applicable requirements include the following:
 - a. Class II control methods and work practices from WAC 296-62-07712(9) and (10) must be used.
 - b. A certified asbestos supervisor must be present at the worksite to assess the condition of the tile at the initiation of the removal project to determine whether the flooring material remains significantly intact. If removal of non-intact flooring material occurs, critical barriers or other isolation methods are to be used.
 - c. Water misting must be used to control asbestos containing dust and debris.
 - d. Proper housekeeping must be conducted and the vehicle must not be driven over removed tile.
 - e. Employees in the work area must wear, at a minimum, a half-mask air purifying respirator during the entire removal project.

- f. The employer must periodically check the air quality to determine employee exposure to carbon monoxide during vehicle operation.
 - g. Employers must conduct employee exposure assessments as required by WAC 296-62-07709. If removal conditions change, employers are expected to conduct additional exposure assessments.
 - h. Employers must conduct initial exposure assessments as per WAC 296-62-07709(3).
 - i. All other applicable provisions of Chapter 296-65 WAC and WAC 296-62-077 must be followed.
2. All other mechanical processes where any asbestos-containing flooring materials are removed by mechanical methods such as chipping, grinding, sanding, or sawing are not affected by this memo and continue to require the use of negative pressure enclosures.