



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 5, 2003

Ahmad Najjar
Asbestos NESHAP Coordinator
California Air Resources Board
1101 I Street
Sacramento, CA 95812

Dear Mr. Najjar:

Thank you for your inquiry regarding the applicability of the Asbestos NESHAP to the use of a mechanical buffer and solvent to remove asbestos-containing floor mastic.

EPA has consistently determined that mechanical removal methods will render non-friable materials into regulated asbestos containing material (RACM). Even though floor mastic is a Category I non-friable asbestos-containing material and is not normally regulated when in good condition and where hand removal methods are utilized, the use of a mechanical buffer and abrasive pads would render the mastic into RACM.

As the buffer creates RACM, all notification and work practice requirements of the Asbestos NESHAP must be met. This includes wetting the mastic material. The use of a solvent in large enough quantity should adequately wet the material for the purpose of the NESHAP.

This determination in no way reduces or eliminates any other Federal, state, or local requirements for asbestos removal.

If you have any further questions on the asbestos NESHAP, feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert S. Trotter", with a long horizontal flourish extending to the right.

Robert S. Trotter
Asbestos NESHAP Coordinator