

# Removing Vinyl Asbestos Tile in New Jersey



## ***A Contractor's Guide for the Non-friable Removal of Vinyl Asbestos Floor Tiles***

### **Information Includes:**

- General requirements for VAT removal
- Requirements for removing VAT which is covered by carpeting
- General recommendations

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*Contractor Information for Non-Friable Asbestos Work Activities*

*Notification of Non-Friable Asbestos Work Activities*

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## Purpose

The purpose of this document is to provide guidance and establish minimum work-practice requirements for the removal of non-friable vinyl asbestos floor tiles (VAT). This document will establish the following:

- Procedures which document contractor competence and the qualifications of individuals who perform the removal.
- Removal procedures which reduce occupational and environmental exposures to airborne asbestos fibers.
- Procedures for the submission and review of exemption requests and contractor filing of pre-removal notifications.



## Background

N.J.A.C. 8:60, *Asbestos Licenses and Permits*, allows certain asbestos removal activities to be exempted, providing certain requirements are met. One activity which can be exempted from the permit and licensing requirements is the removal of vinyl asbestos floor tiles (VAT). To qualify for an exemption, contractors must comply with the guidance provided in this document.

## How to Begin

Prior to performing any exempted activities, a contractor must initially submit a completed *Contractor Information for Non-Friable Asbestos Work Activities—Exemption Request* form to the DOH. DOH staff will verify that all of the information provided is accurate.

Following is a list of items required to be submitted:

- Method of Removal—Contractors must indicate the method of removal and sign a statement that those methods will be adhered to during the removal of the VAT. Currently, the only removal method recognized by the DOH is the Resilient Floor Covering Institute's (RFCI's) *Recommended Work Practices for the Removal of Resilient Floor Coverings*.

## How to Begin (cont'd)

- Employee Training—Evidence that employee's have been trained by the manufacturer on any specialized equipment to be used (such as a radiant heat machine), must be provided.
- OSHA Training—Must provide evidence of completion of a training course which complies with the OSHA Asbestos Standard, 29 CFR part 1926-1101, sections (k)(9)(iv) and (o)(4)(i) for Class II operations. This documentation must be submitted for each employee who will be removing the VAT.



**NOTE:** The use of historical data as prepared by the RFCI through a study performed by the Environ Corporation, may be used to satisfy the OSHA requirements for the initial negative exposure assessment. In granting an exemption, as specified under N.J.A.C. 8:60, the DOH will accept this data. However, the contractor must ensure that the conditions during the removal are consistent with the conditions specified in the RFCI document. If work site conditions will differ from those specified by RFCI, the contractor must provide current exposure data which is relevant to the conditions under which the work will be performed.

## Removal Guidelines

The following steps must be followed prior to and during a VAT removal:

1. Heat must be used, following the RFCI recommended work practices for removal and clean-up.
2. The contractor must follow work practices which limit tile breakage during work. When tiles begin to break frequently (more than once every so often), removal activities must cease.
3. Contractors must have the scope of work on the job site at all times during the work.

**NOTE:** "Intact" means that the VAT has not crumbled, been pulverized, or has deteriorated to such a degree that asbestos fibers are no longer bound in the matrix of the tile. Incidental breakage of VAT during a removal operation, which is being conducted in accordance with RFCI guidelines, does not mean the material is not being removed intact.

## Removal Guidelines (cont'd)

- Contractors must generally isolate the work area by posting notices and placing demarcation barriers between any building occupants and the work area.
- All HVAC vents must be sealed with poly.
- All building occupants not involved in the removal of the VAT must be restricted from entering the work area.
- All movable objects must be moved out of the work area.
- All horizontal surfaces must be wet wiped and then vacuumed with a vacuum cleaner equipped with a High Efficiency Particulate Air (HEPA) filter. The vacuum cleaner must be made for this purpose as household vacuum cleaners equipped with a HEPA filter are not adequate.
- Contractors must comply with all applicable state and federal regulations regarding the transport and disposal of asbestos containing materials.



## Removal of VAT Covered by Carpeting



The removal of VAT, which is covered by carpeting, is not addressed in the RFCI work practices. Therefore, the following requirements should be followed when carpet covered VAT is removed:

- Thoroughly saturate the carpeting prior to beginning the removal of the carpeting.
- Cut the carpeting into manageable strips using a razor knife.
- Firmly pull the carpeting up while continually misting both sides of the carpet.
- Any tiles which remain attached to the carpeting should be removed and bagged, or the entire strip of carpeting should be bagged as ACM.
- For the removal of tiles remaining on the floor, follow the RFCI work practices.
- All debris, carpet, and tiles must be disposed of in accordance with any applicable federal and/or state regulations.

## General Recommendations

Following are some general recommendations to consider when planning a VAT removal:

- Work should be performed during a time when there are no or very few occupants in the building.
- All horizontal surfaces should be covered with poly or another non-permeable disposable barrier.
- HEPA filtration units should be used and vented outside the building, when feasible.
- Transmission Electron Microscopy (TEM) air testing should be performed at the completion of the job to ensure the area is safe for re-occupancy.

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# DOH Oversight

A *Notification of Non-Friable Asbestos Work Activities* form must be submitted 10 days in advance of the beginning of the job. Should an emergency arise which requires the material to be removed sooner than 10 days, a written justification from the building owner must accompany the form. Below are the forms that need to be completed:

**Notification of Non-Friable Asbestos Work Activities:**

<http://www.state.nj.us/health/forms/ceoh-2.pdf>

**Contractor Information for Non-Friable Asbestos Work Activities Exemption Request** (only needs to be submitted with initial notification):

<http://www.state.nj.us/health/forms/ceoh-4.pdf>

Field inspections will be conducted to evaluate compliance with the guidelines outlined and referenced in this document. The DOH has the responsibility to ensure that building occupants are not at significant risk or potentially at risk as a result of the work practices employed by the contractor. Therefore, the contractor may be directed to alter their work practices to ensure the safety of the building occupants. The DOH reserves the right to rescind any exemption approval granted to a contractor to perform exempted activities.

Situations may arise when these requirements and recommendations may not be applicable. If the contractor desires to seek relief from any of the requirements specified herein, a written request must be forwarded to the DOH. The request shall identify the situation which may not conform to the work practices specified and what alternate work practices will be utilized. Written requests should be forwarded to the following address or fax number:

New Jersey Department of Health  
Consumer, Environmental & Occupational Health Service  
Environmental & Occupational Health Assessment Program  
PO Box 369  
Trenton, NJ 08625-0369

Fax: 609-826-4975

For more information you may contact the DOH at 609-826-4950.