



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, which appears to read "Robert S. Trotter", is written over a horizontal line.

Robert S. Trotter  
Asbestos NESHAP Coordinator