Walter D. Anderson  
Resilient Floor Covering Institute  
966 Hungerford Drive  
Suite 12-B  
Rockville, MD 20850

Re: Applicability of the Asbestos Model Accreditation Plan  
Inspector Training Requirements to the Replacement of  
Resilient Floor Covering

Dear Mr. Anderson:

This letter provides further clarification to the response  
in our April 8, 1994, letter regarding whether the asbestos  
inspector accreditation requirement under the Model Accreditation  
Plan (MAP) and section 206(a)(1) of the Toxic Substances Control  
Act applies during general flooring replacement, including  
installation over existing resilient floor covering. It is in  
response to your inquiries of March 21 and April 14, 1994.

The accredited inspector requirement under the interim final  
rule that revised the MAP, 40 C.F.R. Pt 763, Subpt. E, App. C.,  
would not apply to visual or physical examinations of resilient  
floor covering material when conducted as part of the process of  
replacing an existing floor where the material has not been  
sanded, ground, mechanically chipped, drilled, abraded, or cut.  
Resilient floor covering material usually is not friable.  
However, in situations where the floor has been subjected to the  
activities described above, an accredited inspector would be  
required to conduct a visual or physical examination of the  
eexisting floor to determine friability.

As noted in the April 8 letter, the conclusion that no  
accreditation is required in the situation described above is  
based upon the language of the interim final rule and will remain  
in effect until that rule is replaced by the final rule. After  
EPA has considered the comments submitted with respect to the  
interim rule, it will issue a final rule in light of the language  
and intent of TSCA and the comments it has received.

1 The term "cut" includes sawing but does not include  
shearing, slicing, or punching.
Please note that the conclusions with respect to inspector accreditation in this letter are limited to the particular situations described above. Please contact this office if you have questions regarding different situations.

Sincerely,

[Signature]

Linda Vlier Moos
Deputy Director
Chemical Management Division

cc: William Hall
    Diane Sheridan
    Mary Gleaves
    Cindy Fournier
    Phil King
    Tom Ripp
    Asbestos Coordinators, Regions I - X