



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

APR 18 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

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<sup>1</sup>. 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 existing 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.

---

<sup>1</sup> The term "cut" includes sawing but does not include shearing, slicing, or punching.



Recycled/Recyclable  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber

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,



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