

Known Contaminants Versus A Present Danger



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The issue comes up during instruction quite frequently. In mold classes, water restoration seminars, fire cleanup presentations, and forensic restoration training; it is variations of the same thought. What takes precedence in our business when we run into materials that may be regulated under various health and safety standards?

1. Can we continue to pull up water saturated carpet when we see floor tiles underneath?
2. Is it proper to use a smoke sponge on a wall that has been reported to have asbestos in the drywall compound? What if it is not asbestos, but coated with lead-based paint?
3. Is it really a hazard if we remove old fluorescent fixtures and bulbs from a smoke choked warehouse?
4. Can we set fans and dehumidifiers in a room that has lead paint on the walls and trim?
5. Is it legal to pump out water in a basement that has suspect asbestos paper duct wrap on the HVAC runs?*

Of course, the standard answer from many instructors is that all restoration work must cease when there is a question about the presence of regulated materials. But, is that really the case? What if such a response puts workers or occupants at even greater risk than that posed by the regulated hazards? What truly takes precedence?

As an individual that is certified in four asbestos abatement disciplines, approved by the EPA as a lead RRP instructor, and has earned the internationally recognized title of Certified Safety Professional, I would never tell a cleaning or restoration professional to ignore suspect or known regulated materials. However, there is a significant difference between respecting the potential health or safety risk posed by various regulated materials and being scared by the potential of regulatory action that important work is disrupted unnecessarily. In fact, the fear of regulated materials may actually make the situation worse for the owners and occupants if the proper balance is not maintained.

Balancing All The Risk Factors

The key to dealing with regulated materials is to avoid disturbance or control the disturbance so that any potential exposure is below the “permissible exposure limit” (PEL). At the same time, the other safety and health risks need to be worked into the decision-making process. Leaving wet carpet in a building for a week while samples of floor tile are analyzed will generally lead to the growth of bacterial and fungal contaminants. Treating the carpets with antimicrobials and starting the extraction/drying process will minimize the additional risk to the building.

Infection control and forensic restoration cases tend to be a bit more complicated. In those cases you are often trying to balance the risk of regulated contaminants versus a present danger. Responding to a home that is soiled with feces from a *C. diff* patient** on both the asbestos tile floor and the asbestos-containing sheet rock means that the contractor has to take certain precautions, but the *C.*

diff is really the controlling factor. Protection from the asbestos fibers can be obtained by making sure that any cleaning methods for the feces do not damage the asbestos materials. But leaving the C. diff in situ while asbestos testing is done leaves anyone entering the facility at risk of exposure to a potentially fatal organism. As such, treating the C. diff with antimicrobials and properly cleaning the materials without disturbing the asbestos becomes the priority.

In summary, while it is extremely important to be aware of potentially regulated materials and give them due respect, dealing with such issues should never stop the cleaning and restoration professionals from properly addressing a bigger hazard that may be present on the same site.

Now ... back to those questions at the beginning of the article. Here is how I typically address these types of questions:

1. If the carpet is set in place with tack strips, there typically is little risk of

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exposure even if the floor tiles underneath contain asbestos. In contrast, glued down carpet that has not fully separated from the tiles below such that whole tiles or pieces are stuck on the back the carpet as it is being removed

should be left in place until confirmation that the tiles are asbestos free. In such instances, extraction and drying may have to be done on a temporary basis in order to prevent mold growth on the other surfaces even though that carpet will be pulled out later.

2. Smoke sponges generally do not disturb the surface and are safe to use on the painted drywall, even if the paint contains lead. The exception to this general approach is if the paint or drywall joint compound is badly deteriorated and will actually come off when it is being wiped.
3. The mercury in the fluorescent bulbs and PCBs in the ballast can both be regulated materials depending on the quantity. Even so, the lights can be removed and stored until a final determination is made since taking down the fixtures in a reasonable fashion does not create an exposure to either of the materials.
4. Generally, the use of floor fans and dehumidifiers does not create a dis-



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turbance of painted surfaces and are safe to use. From a common sense perspective, do not point floor fans at painted surfaces where the paint is flaking or deteriorated.

5. If the suspect asbestos material is above the water line and generally intact the pump out can continue. If it appears that there may be a substantial amount of duct wrap that may be in the standing water, the pump out should proceed with a two-stage water filter designed for collecting asbestos fibers similar to those used on asbestos abatement projects. Even with such

equipment, the pump out typically is not going to be covered as an asbestos abatement activity. However, once the

standing water is removed, the muck out would be considered abatement if asbestos debris is present. 

** C.diff is the shorthand for Clostridium difficile, a species of Gram-positive spore-forming bacteria that is the scourge of many medical facilities because of the aggressive gastrointestinal infections that it causes; many of which are life-threatening.



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