

Environmental Safety Training Professionals, Ltd.

11315 Sunrise Gold Circle, Suite L

Rancho Cordova, CA 95742

Phone 916 638-5550

Fax 916 638-5551

March 4, 2003

Greg Johnson

National Asbestos Flooring Encasement Systems, Inc.

419 Main Street

Placerville, CA 95867

Dear Mr. Johnson:

This letter is offered as clarification of basic issues involving asbestos floor tile and mastic. In addition to being a Certified Asbestos Consultant (DOSH Certification Number 92-3127) I also instruct asbestos abatement management classes that are accredited by the US EPA and Cal/OSHA. I have been involved in the asbestos industry for nearly 20 years and have made efforts to keep abreast of current regulations and industry trends.

Flooring and mastic containing asbestos (>1%) are regulated under both State and Federal Law. I have heard that many believe Cal/OSHA regulatory compliance is less for floors; this is a false rumor. Cal/OSHA regulations have not changed significantly with regard to asbestos in the past five years. In fact, our company currently offers a Cal/OSHA Class II Construction Craft Worker (8 hour) certification class for asbestos flooring operations that is mandated under current regulations (workers may elect to take a 4 day class in lieu of the one day flooring class). Penalties for failure to comply with applicable rules and regulations are significant. For example Cal/OSHA fine structure increase more than 300% in January 2000 for \$7,000 per item to \$25,000 per item per day. The EPA fine structure is also \$25,000 per item per day with no maximum established.

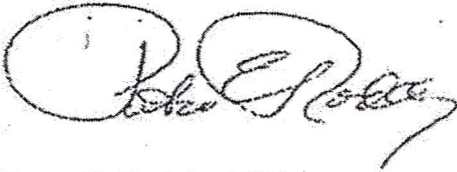
The past practice of covering flooring with carpet creates the potential for asbestos fiber disturbance and release. The backing of carpet is not airtight; the backing of carpet is quite abrasive. The application of an adhesive or tacking strips for carpet actually disturbs the condition of the asbestos and could potentially release asbestos fibers into the air. The use of self sticking adhesive (eliminating the manual application of adhesive) provides only a temporary and weak bond that will break down and permit minor movement of the carpet. This movement would abrade the asbestos floor beneath resulting in the release of asbestos fibers. The short life of the adhesive would require additional maintenance over the next 5 to 10 years resulting in further exposure to asbestos fibers.

State-of-the-art practices would include applying an airtight encasement in lieu of complete removal. The US EPA recommends management in-place where practical; this application is an excellent example. The option would be complete removal of the asbestos floor and related mastic. Encasement would offer substantial cost savings to your client(s). Any abatement of asbestos flooring that exceeds 100 square feet requires DOSH certification for the contractor and the workers.

My recommendation, where the facility owner desires not to completely remove the asbestos flooring, would be to apply an appropriate encasement material. This process, where recommended, offers both cost benefits and adheres to US EPA guidelines for maintaining asbestos safely in place. Carpeting over asbestos floor tiles does not ensure a safe working or living environment and exposes occupants to carcinogenic asbestos fibers. Carpeting over asbestos could result in significant regulatory compliance actions and associated fines.

Thank you for the opportunity to offer this recommendation. If there are any other questions, please feel free to call:

Sincerely,

A handwritten signature in black ink, appearing to read "Peter E. Roddy". The signature is written in a cursive style with large, rounded letters.

Peter E. Roddy, MPA
California Certified Asbestos Consultant
DOSH No: 92-3127