

ASBESTOS OPERATIONS AND MAINTENANCE HANDBOOK

A Guide for Facilities Maintenance Personnel

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**Contact the Office of Property and Construction Services if
You have any asbestos-related questions and/or concerns at:
(206) 382-4851 or toll-free at 1(800) 809-4923.**

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Asbestos Operations and Maintenance Handbook

A) Purpose and Objectives

The Archdiocese is committed to providing a safe working environment for all workers and will provide the training needed to comply with regulations. For all active Catholic Schools, the Environmental Protection Agency through the AHERA program and the Washington State Department of Labor & Industries both have regulations governing in-place maintenance and removal of all asbestos-containing materials or presumed asbestos containing materials. If there is not an active Catholic School, only the Department of Labor and Industry regulations will apply.

In order to determine which materials are ACBMs (Asbestos Containing Building Materials) the Archdiocese has inspected, or will inspect, all buildings for asbestos containing materials prior to a renovation, construction, or maintenance project. The asbestos inspection report is available for all workers to review prior to beginning any project. Workers are expected, and required, to familiarize themselves with the potential of encountering asbestos and other hazardous materials prior to beginning work and these objectives include:

- Clean up existing contamination
- Minimize future fiber release by controlling access to ACBMs
- Maintain ACBM until it is eventually removed

It is required to abate asbestos-containing materials if they have reached the end of their useful life and can no longer be maintained.

B) Training

All maintenance and custodial workers, as a minimum, will be trained as class IV asbestos workers as required by Washington Department of Labor & Industries regulations. This training satisfies the requirement for training required by the AHERA program.

Class IV worker training consists of an initial 2-hour worker course given by an approved course sponsor. Each worker shall maintain a current worker certificate with an annual refresher course. Options for additional Class III training (e.g. small scale, short duration ACBM removal or repair) will be reviewed on an as needed basis.

It is anticipated that all work involving class I, II or III asbestos workers will be performed under the Archdiocese Hazardous Material Contract by a licensed asbestos abatement contracting firm approved by the Office of Property and Construction Services with the contract executed by the Corporation.

C) General Cleaning Practices

INITIAL CLEANING

Initial cleaning, as referred to in the AHERA regulations for schools, was completed in all areas where friable surfacing material was originally identified. The procedures below are listed only for clarification should a major fiber release episode occur.

Custodial Staff should:

- Steam-clean all carpets throughout the affected area or vacuum with a High Efficiency Particulate Air (HEPA)-filtered cleaner. Spray the vacuum cleaner bags with water before removing, place in sealed, leak-tight, 6-mil plastic bags and dispose of as asbestos material at an approved landfill site. Discard vacuum filters in a similar manner.
- HEPA vacuum all soft-surface materials such as curtains, fabric chairs and books. Discard vacuum bags and filters in sealed bags as stated above.
- HEPA vacuum or wet clean all non-carpeted floors. Wipe all shelves and other horizontal surfaces with damp cloths. Use a mist spray bottle to keep cloth damp. Discard cloths and mop heads in sealed plastic bags as stated above in Item 1.

PRIMARY CLEANING TECHNIQUES

All maintenance and custodial workers should have received training to properly deal with actual or suspect asbestos containing debris. Workers should avoid patching or repairing any damaged surfacing ACBM until the facility manager has assessed the situation. These are primary cleaning techniques for ACBM.

- Spray all suspect asbestos-containing debris with water and place the debris in plastic bags using a dustpan. Rinse the pan with water into the bag.
- HEPA vacuum all carpets.
- Wet-mop all other floors and wipe all other horizontal surfaces with damp cloths.
- Mist filters in a central air ventilation system with water from a spray bottle as the filters are removed. Place filters in plastic bags prior to disposal.
- All debris, filters, mop heads, and cloths should be placed in sealed, leak-tight, 6 mil plastic bags. The facility manager should be notified for appropriate disposal.

D) Special Work Practices For Maintenance Activities

Normal maintenance activities can disturb ACBM and raise levels of airborne asbestos. Maintenance workers should be cautioned against conducting any maintenance work in a manner that may disturb ACBM.

The O & M program includes provisions for each type of ACBM that is present in the building:

1. **Surfacing materials**: Sprayed-on or troweled-on materials, such as acoustical plaster on ceilings or fireproofing materials.
2. **Thermal Surfacing Insulation (TSI)**: Insulation on pipes, fittings, boilers, etc.
3. **Other ACBM**: vinyl flooring, ceiling tiles, transite wallboard, etc.

The nature and extent of special work practices should be tailored to reflect the likelihood that the ACBM will be disturbed and fibers released. Four categories of potential disturbance are defined:

- a. Contact with the ACBM is unlikely;
- b. Accidental disturbance of ACBM is possible;
- c. Disturbance of ACBM is intended or likely:
 - i. A small amount of ACBM (less than three square feet of three linear feet) will be disturbed;
 - ii. A large amount of ACBM (three or more square feet or linear feet) will be disturbed.

The following sections on surfacing materials, thermal system insulation, and other types of ACBM describe the work practices in detail.

NOTE: Class IV trained workers are not authorized to perform repairs of TSI pipe insulation.

1) Surfacing Materials

Maintenance activities affecting asbestos-containing surfacing materials generally involves either cleaning or repairs where the material has been damaged by an occupant, the environment or other maintenance activities.

a. Contact with ACBM is Unlikely

In some buildings with ACBM, many routine maintenance activities can be conducted without contacting the ACBM. For example, changing light bulbs in a fixture on a ceiling with asbestos-containing acoustical plaster can usually be performed without jarring the fixture or otherwise disturbing the ACBM. (The top of the fixture should have been wet-cleaned previously to remove settled fibers.) In these situations, few precautions other than normal care are needed. Assure the availability of respirators and a HEPA vacuum if needed. These do not have to be taken to the site, but should be available at a known location in the building. Where maintenance is performed in parts of the building free of ACBM, no special precautions are usually necessary.

b. Accidental Disturbance of ACBM is Possible

Routine maintenance and repair includes work on light fixtures, plumbing fixtures and pipes, air registers, HVAC ducts, and other accessible parts of building utility systems. Where these fixtures or system parts are near ACBM, maintenance work may unintentionally disturb the ACBM and release asbestos fibers.

For example, maintenance work on ventilation ducts in an air-handling room where asbestos fireproofing is present only on structural beams could be conducted without contacting the ACBM. However, the fireproofing could be disturbed accidentally during the course of the work.

The following precautions and procedures should be used if accidental disturbance or ACBM (or dust and debris containing asbestos fibers) is likely:

- Approval should be obtained from the facility manager before beginning work. The facility manager will make an initial visit to the work site.
- The work should be scheduled after normal working hours (nights or weekends), if possible, or access to the work area should be controlled: doors should be locked from the inside and signs posted to prevent unauthorized persons from entering the work area (e.g., "MAINTENANCE WORK IN PROGRESS, DO NOT ENTER," or, if asbestos levels are, or are anticipated to be, high enough to trigger Department of Labor and Industries Rules (the PEL or higher), "DANGER - ASBESTOS: CANCER AND LUNG DISEASE HAZARD: AUTHORIZED PERSONNEL ONLY: RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA". Note: emergency exits must remain in operation.
- The air-handling system should be shut off or temporarily modified to prevent the distribution of any released fibers to areas outside the work site.
- A 6-mil polyethylene plastic drop cloth should be placed underneath the location of the maintenance work, extending at least 10 feet beyond all sides of the work site. Alternatively, a rectangular enclosure constructed of 6-mil plastic on a frame can be positioned underneath the maintenance area to inhibit the spread of fibers from fallen the ACBM.
- The ACBM in the vicinity of the maintenance work should be misted lightly with amended water (water to which a surfactant – wetting agent – has been added to increase the ability of the liquid to penetrate the ACBM). Use a mister that produces a very fine spray. Be sure that the electrical system is shut off before spraying around any electrical conduits or fixtures.
- After maintenance work is completed, the fixture, register, or other component, and all tools, ladders and other equipment should be HEPA-vacuumed or wiped with a damp cloth.

- If any debris is apparent on the drop cloth, floor or elsewhere, it should be HEPA-vacuumed.
- The plastic drop cloth (or enclosure) should be wiped with a damp cloth, carefully folded, and discarded as asbestos waste.
- All clothes, vacuum bags/filters, and other disposable materials should be discarded in sealed and labeled plastic bags as asbestos waste.

c. Disturbance of ACM Intended or Likely

Some maintenance and repair activities will unavoidably disturb the ACM. For example, installing new sprinkler or piping systems will necessitate hanging pipes from structural members or the ceiling. If the beams or ceilings are insulated with ACM, the ACM will be scraped away to install hangers. Likewise, pulling cables or wires through spaces with ACM or ACM debris is likely to dislodge pieces of the ACM or disturb ACM debris and dust. Projects that cannot be performed without the disturbance of asbestos-containing materials will be suspended until the area can be abated by certified asbestos workers prior to ongoing maintenance work.

- i. Small Scale Disturbance (Class III Trained Worker, minimum)
For maintenance activities which involve small-scale (less than 3 square feet) removal of surfacing ACM or when disturbance of ACM dust and debris or unintentional contact with the ACM is likely, see the previous section 1) b.
- ii. Large Scale Disturbance (Class I or Class II Trained Worker, minimum)
Any maintenance work, which involves removal of 3 or more square feet of surfacing materials (or 3 linear feet of thermal system insulation), should be considered a large-scale disturbance of ACM. Planned maintenance projects involving the disruption of this amount of asbestos material will be subject to contractor work.

The Archdiocese of does not maintain certified asbestos abatement workers on staff to properly conduct the necessary pre-maintenance removal. Certified asbestos workers must follow the applicable regulations in effect at the time of the abatement. The work will typically follow the procedures listed below:

- All of the procedures for asbestos removal must be followed -- construction of containment barriers and decontamination facilities; use of protective clothing and "type C" respirators by workers; proper disposal of asbestos debris; and proper cleanup of the work site followed by air testing.
- Once the work site has been adequately isolated and all precautionary measure has been taken, the work could begin. If the

work involves cutting, drilling, grinding, or sanding the ACBM, special tools equipped with HEPA vacuum attachments must be used. Where the ACBM is simply scraped off the substrate, the hose from a HEPA vacuum cleaner should be placed just below the removal site to catch the ACBM. Upon completion of the work, the vacuum bags and filters should be discarded as asbestos waste.

- Where the ACBM was disturbed as part of the maintenance activity, it should be repaired with non-asbestos plaster or spackling compound or sprayed/painted with an encapsulant or latex paint (see section 5.1.3 of the EPA Purple Book for specifications). This should be done before any final cleanup of the work site.

2) Thermal System Insulation

Maintenance activities affecting asbestos-containing thermal system insulation generally involves plumbing-type repairs, or repairs to the heating, ventilation and air conditioning (HVAC) system. Frequently, the ACBM must be removed to provide access to the valve, flange, duct, or related system part needing maintenance.

a. Contact With ACBM is Unlikely

Maintenance activities or repairs that can be performed without contacting or disturbing the ACBM require little more than normal care and good workmanship. (Respirators and a HEPA vacuum cleaner should be available if needed.) For example, valves that are either uncovered or covered with non-asbestos insulation can be repacked or repaired without disturbing asbestos insulation on nearby pipes. As with surfacing ACBM, the only precautions necessary are to make sure that a HEPA vacuum cleaner and air-purifying respirators are available if needed.

b. Accidental Disturbance of ACBM is Possible

Even maintenance tasks that involve no direct contact with ACBM may cause accidental disturbance. For example, vibrations created by maintenance activities in one part of piping network will be transmitted to other parts. Vibrations could then cause fibers to be released from insulation which is exposed (not covered with a protective jacket) or not in good condition. If in doubt about the possibility of fiber release, thoroughly inspect the thermal system insulation before undertaking the maintenance or repair work. Then, either correct the problem before starting, or assume that the maintenance work may cause accidental disturbance and fiber release. In this case, the following procedures should be used:

- Work approval and site preparation procedures as described under Surfacing Material should be followed.
- Plastic sheets (6-mil polyethylene) should be cut and taped around any insulation that might be accidentally disturbed. The plastic should be misted with amended

water before taping it shut. If the locations where insulation could be disturbed are too numerous for the isolation with plastic, workers should perform the maintenance work wearing air-purifying respirators, at a minimum, and protective clothing, including disposable suits and hoods.

- Cleanup procedures, as described under Surfacing Material, should be followed. Special care should be taken when removing the plastic from the insulation to minimize disturbance of any ACBM dust or debris that may have fallen from the insulation.

c. Disturbance of ACBM Intended or Likely

i. Small Scale Disturbance

Where asbestos-containing insulation must be removed to maintain or repair the thermal system, the ACBM will obviously be disturbed. As with surfacing ACBM, the amount to be removed or manipulated will determine the procedures to be used, and **only by certified Class I or Class II asbestos abatement workers.**

ii. Large-Scale Disturbances

Maintenance activities, which involve removal of 3 linear feet or more of asbestos-containing insulation (e.g., several valves need attention in a utility room or block insulation needs to be removed for boiler repair), should be considered large-scale disturbances. **Non-emergency maintenance projects that require the removal of more than (3) linear feet of material shall be conducted by certified asbestos abatement workers.**

Contractor Practices:

In some situations, glove bag techniques may be appropriate and the procedures described above under "small disturbances" should be followed. When glove bags are not feasible, the abatement activities should be conducted using all the procedures recommended for large-scale asbestos removal. ACBM removal is conducted by abatement contractors.

The choice between conducting multiple glove bag operations and isolating the entire work site is largely one of convenience and cost. However, if the maintenance activities are likely to cause a disturbance of ACBM on pipes, boilers, or ducts at sites other than just those undergoing repair (due to vibration, for example), then the entire room or area should be isolated and large-scale asbestos removal procedures employed.

3) Other types of ACBM

Include vinyl asbestos floor tiles, asbestos ceiling tiles, transite wallboard and counter tops, asbestos roof tiles, and various textile products such as stage curtains. ACBM, per the AHERA Rule, does not include fabrics or exterior products. Disturbance of these materials should be avoided. Where this is not possible, procedures should be used as described above for large-scale removal of ACBM. Cutting, drilling, grinding, or sanding of ACBM must be performed by certified asbestos workers with tools equipped with HEPA-filtered vacuum systems.

Vinyl Asbestos Tiles: The Office of Property and Construction Services does not recommend covering or encapsulating 9x9 vinyl asbestos tile (VAT). The reason for this is two-fold. Firstly, some flooring manufactures will not warrant their material installed directly over vinyl asbestos tile. Secondly, at some point in the future, the new flooring material will need to be replaced. It is very difficult to remove the new floor covering without damaging or disturbing the vinyl asbestos tile. Should this occur, both the new flooring and the existing flooring will become an asbestos removal project thus increasing the cost to remove this material.

E) Special Work Practices for Renovation and Remodeling

All renovation and demolition work within Archdiocese is governed by:

- The local air pollution control authority
- Washington State Department of Labor & Industries
- US-EPA regulations through the AHERA program
- Archdiocesan policies and procedures

All work must comply with the above mentioned regulatory and archdiocesan requirements including inspection, worker practices, permits and post-project inspection.

Renovation and Remodeling

Building renovation or building system replacement or remodeling can cause major disturbance of ACBM. Moving walls, adding wings, and replacing heating or air conditioning systems involve breaking, cutting, or otherwise disturbing ACBM that may be present. Prior to any renovation project a Good Faith Asbestos Survey is completed. Contact the Office of Property and Construction Services to assemble this survey, which must be done by the building owner and given to any contractor at the time they are bidding the project. The contractor performing the work cannot assemble the Survey. The Good Faith Survey will assist the parish or school in determining the extent of any asbestos-containing materials and an appropriate response to handling these materials during the project

F) Emergency Response Procedures

As long as ACBM remains in the building, a fiber release episode could occur. Custodial and maintenance workers should report the presence of debris on the floor, water or physical damage to the ACBM, or any other evidence of possible fiber release to the facility manager or

the Office of Property and Construction Services if necessary. The fiber release episode will need to be classified as either a Minor or Major Fiber Release Episode.

Minor Fiber Release Episodes

Minor episodes are fully addressed in the L&I training requirements for all maintenance and custodial workers. A small section of insulation (less than 3 linear feet) falling from a pipe, or a careless worker bumping into a beam and dislodging a small amount of fireproofing ACM (less than 3 square feet), would be classified as such. Small disturbances can be treated with standard wet cleaning and HEPA-vacuum techniques:

- Workers should wear half-face respirators with HEPA vacuum filters.
- Workers should thoroughly saturate the debris with amended water (a surfactant is added) using a mister with a very fine spray. The debris should then be placed in a labeled, 6-mil plastic bag for disposal and the floor should be cleaned with damp cloths or a mop. Alternatively, the debris can be collected with a HEPA vacuum cleaner.
- All debris and materials used in the cleanup will be discarded as asbestos waste.
- Workers should properly dispose of all cleaning equipment, disposable suits and debris by transporting the material in approved plastic bags to an approved asbestos disposal facility.

The damaged ACM will need to be repaired **only by certified Class I or Class II asbestos abatement workers.**

Major Fiber Release Episodes

Major fiber release episodes are serious events. Large amounts of ACM falling from heights of several feet may contaminate an entire building with asbestos fibers. If 3 square feet or more of surfacing ACM or 3 linear feet or more of thermal system insulation is dislodged from its substrate, the episode should be considered major. A large breach in a containment barrier for a maintenance or abatement project should also be considered a major episode.

AHERA Regulations require that the response action to a major fiber release episode must be designed and conducted by accredited project designers. Should this occur, immediately contact the Office of Property and Construction Services for assistance. The following response procedures will be needed until an asbestos abatement firm can clean up the area.

- The area should be isolated as soon as possible after the ACM debris is discovered. Where the area can be sealed by doors, they should be locked from the inside (escape corridors must remain in operation) and signs posted to prevent unauthorized personnel from entering the work area ("DANGER - ASBESTOS; CANCER AND LUNG DISEASE HAZARD; AUTHORIZED PERSONNEL ONLY;

RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA").

- The air-handling system should be shut off or temporarily modified to prevent the distribution of fibers from the work site to other areas of the building. If possible, doors, windows, and air registers should be sealed with 6-mil plastic sheets and tape.
- Each fiber release episode MUST be documented and a copy of this documentation sent to the Office of Property and Construction.

G) Warning Signs

Warning signs must be placed in areas that generally are accessed by maintenance personnel only, but the general public may be able to enter. Typically, this involves the boiler room, crawl spaces, or attics. The warning sign should read:

"DANGER - ASBESTOS; CANCER AND LUNG DISEASE HAZARD; AUTHORIZED PERSONNEL ONLY;"

Or, should the work area require respirators and protective clothing:

"DANGER - ASBESTOS; CANCER AND LUNG DISEASE HAZARD; AUTHORIZED PERSONNEL ONLY; RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA."

H) Recordkeeping

All written records discussed in this section should be maintained as part of a thorough recordkeeping process. To review, these include:

- The written O & M Plan itself, including work practices;
- Building plans, drawings, or sitemaps;
- Survey data, sampled test results;
- Descriptions, dates, and attendants of training programs;
- Copies of all permits and documentation of custodial, maintenance, renovation, and all asbestos-related actions performed.

I) Other related information

T.S.I. (pipe insulation): The most probable hazard with asbestos is deterioration of asbestos-containing pipe. When in good shape, pipe wrap is hard like a cast. Over time, it can turn into a fine powder. The most important preventative step you can take is to perform a periodic surveillance of all pipe wrap. You may observe powder on a surface below

deteriorated pipe wrap or notice a section has become soft. This means deterioration has occurred. If the exterior wrap is opened, the powder may fall, creating a dust cloud of asbestos which may or may not be seen. This is the most likely scenario for damaging inhalation of asbestos fibers. If deterioration has occurred, contact Property and Construction Services immediately at (206) 382-2064.

Lead: Lead in *interior paint only* was banned in 1978. Exterior paints are still allowed to contain moderate amounts of lead. Lead is primarily a concern for buildings with children 6 years old or younger. Any building which is used for daycare, pre-school, or kindergarten must be tested by a certified Lead Inspector for lead in dust after any kind of renovation or construction work. See additional information in Appendix 11 on Lead. Air monitoring for lead is required by anyone doing demolition in any building built before 1980. If lead content is above 50 micrograms per cubic meter, appropriate protective measures must be taken, including the correct respirator, gloves, etc.

Maintenance of Vinyl Asbestos Tile

(Revised from "Guidelines for the Maintenance of Asbestos-Containing Floor Coverings," developed by Rhode Island Department of Health and the Environmental Protection Agency, New England)

Vinyl Asbestos Tile (VAT) is the most prevalent source of asbestos-containing material in our facilities and most likely will be for years to come. Although VAT is considered non-friable, the frictional forces exerted on these materials during routine floor-care maintenance operations can release asbestos fibers.

The principle types of floor covering maintenance performed routinely on resilient floor tiles include:

- 1) spray-buffing and dry burnishing; and
- 2) wet scrubbing and stripping followed by refinishing.

The following are guidelines on the maintenance of asbestos-containing floor coverings. When properly implemented, these guidelines should help you reduce the potential for the release of asbestos fibers into the air.

Stripping of Vinyl Asbestos Floor Coverings

Training - Custodial and maintenance personnel who are responsible for the care and maintenance of asbestos-containing floor coverings should be thoroughly trained to safely and properly operate the machines, pads and floor care chemicals used at the facility.

Frequency of Stripping - Stripping of vinyl asbestos floor coverings should be done as infrequently as possible (e.g., once per year maximum and preferably when the building is unoccupied). Excessive stripping of floors using aggressive techniques will result in increased levels of asbestos fibers in the air.

Prior to Stripping - Prior to machine operation, apply an emulsion of chemical stripper in water to the floor. Use a mop to soften the wax or finish coat.

Stripping Operations - When stripping floors becomes necessary, the machine used for stripping the finish should be equipped with the least abrasive pad as possible (black pads are usually the most abrasive and white pads the least abrasive). Consult with your floor tile and floor finish product manufacturer for recommendations on which pad to use on a particular floor covering. Incorporate the manufacturer's recommendations into your floor maintenance work procedures.

The machine used to remove the wax or finish coat should be run at a low rate of speed (i.e., ranging between 175-300 rpm) during the stripping operation. There is a direct correlation between machine speeds and the release of asbestos fibers from asbestos containing floor coverings. The higher the machine speed, the greater the probability of asbestos fiber release.

Never perform dry stripping. Always strip floors while wet. Do not operate a floor machine with an abrasive pad on un-waxed or unfinished floor containing asbestos materials.

Consult with floor tile and floor finish product manufacturers concerning specific or unique problem(s) on the maintenance of your floors.

After Stripping - After stripping and before application of a high solids floor finish, the floor should be thoroughly cleaned, while wet, preferably with a Wet-Vac HEPA filtration vacuum system.

Finishing of Vinyl Asbestos Floor Coverings

Use of Sealer and Solids Finish - Prior to applying a finish coat to a vinyl asbestos floor covering, apply 2 to 3 coats of sealer. Continue to finish the floor with a high percentage solids finish.

It is an industry recommendation to apply several thin coats of a high percentage solid finish to obtain a good sealing of the floor's surface, thereby minimizing the release of asbestos fibers during finishing work.

Spray-Buffering Floors - When spray-buffering floors, always operate the floor machine at the lowest rates of speed possible and equip the floor machine with the least abrasive pad as possible. A recent EPA study indicated that spray-buffering with high-speed floor machines resulted in significantly higher airborne asbestos fiber concentrations than spray-buffering with low speed machines.

Burnishing Floors - When dry-burnishing floors, always operate the floor machine at the lowest rate of speed possible to accomplish the task (i.e., 1200-1750 rpm), and equip the floor machine with the least abrasive pad as possible.

Cleaning After Stripping & Sealing Floors - After stripping a floor and applying a new coat of sealer and finish, use a wet mop for routine cleaning whenever possible. When dry mopping, a petroleum-based mop treatment is not recommended for use.