2011 Carpet Removal Best Practices for Carpet Recycling

For Use by Flooring Professionals Wanting to Recycle Used Carpet in Washington State
Acknowledgements

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DISCLAIMER

The intent of the 2011 Carpet Removal Best Practices for Carpet Recycling is to provide guidance, based on the consensus of key stakeholders, to flooring professionals who wish to recycle carpet.

The 2011 Carpet Removal Best Practices is not intended to serve as a substitute for communicating with the recycling facility or understanding regulations. King County accepts no responsibility or liability for ensuring compliance with applicable regulations or guaranteeing the acceptance of carpet for recycling if these best practices are followed. The regulatory requirements referenced in these Best Practices are specific to the State of Washington, and serve only as guidelines for other parts of the US; we recommend that flooring professionals, or contracting parties that might use the specification in Appendix C of this document, verify the regulatory requirements applicable in their state and modify the practices and specification as appropriate.

Flooring professionals are encouraged to utilize the additional resources identified in this document.
Introduction

Carpent is a prevalent material in our waste stream. In 2010, an estimated 37,000 tons of used and scrap carpet generated in Seattle and King County was landfilled; area solid waste agencies estimated that only a very small percentage was recycled. Opportunities are increasing in the Puget Sound area to recycle carpet and recover its valuable components. In addition to the benefit of materials recovery and decreased disposal in a landfill, flooring professionals who elect to recycle carpet may save on avoided disposal fees and appeal to environmentally-conscious clients.

Beginning in 2009, King County Solid Waste Division’s LinkUp program collaborated with Seattle Public Utilities and others to develop a strategy to support the establishment of a local recycling market for used carpet generated in the Northwest. One of the outcomes of this work was the Northwest Carpet Recycling Strategy, which that outlines a roadmap for developing processing capacity for used carpet and end-markets for carpet-derived material commodities.

Part of this effort has been to develop carpet removal best practices. These practices are intended to be a tool for flooring professionals to use to reduce contamination of recovered carpet and thus reduce the incidence of contaminated carpet delivered for recycling. While reclaiming carpet that is free of contaminants is critical for recycling, the regulatory requirements in this document, which protect workers and building owners, apply not only to removing carpet for recycling, but to all renovation projects.

This document is divided into three sections: Definitions, Before Carpet Removal, and During Carpet Removal. Appendices follow the main document, including relevant asbestos regulations, additional resources, model specification for carpet removal, and an owner’s asbestos statement form.

Definitions

Key terms used in this document are defined below.

- **Asbestos** is a naturally-occurring mineral used in a variety of building products because of its tensile strength and chemical and thermal resistance. Because it is a carcinogen that causes lung cancer and mesothelioma, laws have been enacted to prevent asbestos exposures.¹
- **Asbestos abatement** means removal and proper disposal of asbestos. Other than a homeowner working on their own residence that is not used for commercial purposes and where there is no employee exposure, anyone removing asbestos must be certified by the Washington State Department of Labor and Industries (L&I) and notify L&I and Puget Sound Clean Air Agency (PSCAA) of any asbestos abatement projects 10 days prior to starting work.² For instructions regarding disposal of asbestos-containing waste, see PSCAA’s website on “How to Dispose of Asbestos-Containing Waste.”³

• **Asbestos-containing material (ACM)** means any material containing more than one percent (1%) asbestos as determined using the method specified in EPA regulations Appendix E, Subpart E, 40 CFR Part 763, Section I, Polarized Light Microscopy.\(^4\) The percentage of asbestos has regulatory implications. Materials containing 1% or less asbestos are not regulated by PSCAA.\(^5\) U.S. Department of Labor Occupational Safety & Health Administration (OSHA) and L&I consider such material to be unclassified and still require an exposure assessment, use of vacuum cleaners equipped with high-efficiency particulate air (HEPA) filters, use of wet methods, and prompt cleanup of debris, use of respirators and protective clothing, training, and record keeping.\(^6\)

• **Asbestos Hazard Emergency Response Act (AHERA)** is the federal law that requires special training for all individuals whose work involves contact with ACM in school, public, and commercial buildings.

• **Asbestos project** means the construction, demolition, repair, remodeling, maintenance, or renovation of any public or private building or structure, mechanical piping equipment or system involving the demolition, removal, encapsulation, salvage, or disposal of material or outdoor activity releasing or likely to release asbestos fibers into the air.\(^7\)

• **Asbestos survey and report** means a survey and associated report that determines the presence and extent of asbestos in a building. Asbestos surveys (also called “good faith inspections”) must be performed by an accredited AHERA building inspector.\(^8\)

• **AHERA building inspector** means a person who has successfully completed the training requirements for a building inspector established by the EPA Asbestos Model Accreditation Plan Interim Final Rule (40 CFR Part 763, Appendix C) and whose certification is current.\(^9\)

• **Backing** means fabrics and other materials that make up the back of the carpet as opposed to the carpet pile or face.\(^10\)

• **Carpet recycling** means collecting and sorting used carpet and processing it using equipment that separates its constituent materials so that those materials can be supplied for use in new products or further processed for future supply.

• **Carpet scrap** means pieces of new carpet that are generated during installation as the carpet is cut to fit its intended surface space.

• **Certified asbestos contractor** means any partnership, firm, association, corporation, or sole proprietorship, registered under chapter 18.27 RCW, that submits a bid or contracts

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to remove or encapsulate asbestos for another and is certified by L&I to remove or
capsulate asbestos.\textsuperscript{11}

- \textbf{Contaminants / Contamination} means materials or products that come in contact with
carpet and render it unsuitable for recycling. Examples of carpet contaminants are
asbestos, other flooring, paint, glues / mastics, ceiling or wall texture, and excessive
construction dust and debris.

- \textbf{Disturb} refers to activities that disrupt the matrix of ACM or presumed asbestos-
containing material (PACM), crumble or pulverize ACM or PACM, or generate visible
debris from ACM or PACM.\textsuperscript{12}

- \textbf{Face fiber}: The upper surface of carpet consisting of yarn tufts in loop and/or cut
configuration. Sometimes called "pile" or "nap".\textsuperscript{13}

- \textbf{Friable} means ACM that, when dry, can be crumbled, pulverized, or reduced to powder
by hand pressure or by the forces expected to act upon the material in the course of
demolition, renovation, or disposal. Such materials include, but are not limited to,
thermal system insulation, surfacing material, and cement asbestos products.\textsuperscript{14}

- \textbf{Suspect asbestos containing material} or \textbf{Suspect material} means material that is known
to have historically contained asbestos including, but not limited to, asphalt floor tile,
v vinyl floor tile, vinyl sheet flooring, poured flooring, flooring backing, adhesives,
construction mastics (floor tile, carpet, ceiling tile, etc.), sub-floor slip sheet, spackling
and joint compounds, wallboard, decorative plaster, fireproofing materials, and thermal
insulation.

\section*{Before Carpet Removal}

This section describes some actions that a flooring professional should take before each carpet-related
project to help their business successfully recycle carpet as a regular practice.

\section*{Select a Recycler and Learn Their Requirements}

Carpet recycling is now available in the Puget Sound area. The Carpet America Recovery Effort website
provides a current list of companies offering carpet recycling services.\textsuperscript{15} After identifying a recycling
company to work with, talk to the recycling company about their carpet acceptance requirements. This
information will save time later. Consider asking carpet recyclers the following questions:

- What carpet is acceptable for recycling and what condition must it be in?
- How does the recycler want material prepared (e.g., rolled, flat, size limits)?
- Does the recycler want material stored and transported in certain types of containers?
- Do they accept carpet scrap? If so, how should it be prepared (e.g., bagged in a clear
  bag, loose)?
- Do they also accept carpet pad for recycling?
- Does the recycler require any documentation to accompany carpet for recycling?
- What is their protocol if asbestos or other materials contamination is found in a load?

\begin{itemize}
\item \textsuperscript{13} Definition adapted from the Carpet and Rug Institute’s Carpet Terms for Residential Customers at
\item \textsuperscript{14} Definition from PSCAA’s Regulation III, Section 4.01 Definitions, available at
\item \textsuperscript{15} http://www.carpetrecovery.org/waste.cfm.
\end{itemize}
• What do they consider asbestos contamination? (Some recyclers have no tolerance for any level of asbestos, while others do not accept ACM [material containing more than 1% asbestos]).

**Train Staff and Subcontractors**

Once a flooring professional knows the requirements from the recycling company, he or she should train staff and subcontractors to meet those requirements.

Flooring company staff and subcontractors must comply with asbestos regulations whether carpet is being removed for recycling or disposal.

Washington State law requires flooring professional staff and subcontractors to complete an asbestos awareness training to recognize the presence and extent of ACM in buildings and how to respond when ACM is present. 16 17 Suspect materials frequently encountered during flooring projects include:

- Vinyl sheet flooring and mastic
- Vinyl floor tile and mastic
- Poured flooring
- Asphalt flooring
- Construction mastics
- Leveling compound
- Sub-flooring slip sheet

For a more detailed list of suspect materials, see PSCAA’s *Asbestos Survey Guidance*.18

**Collect Required Documentation from Building Owner**

Before receiving a bid or estimate, a building owner or owner’s agent must, at a minimum, provide 1) a written statement that suspect materials either are not present or are present but will not be disturbed by carpet removal activities, or 2) an asbestos survey report.19 (See Appendix D for a form that could be used for the owner’s written statement.) Asbestos surveys must be conducted by accredited personnel.

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16 WAC 296-62-07701 requires flooring professionals – as members of an industry whose workers, at times, have occupational exposures to asbestos – to comply with WAC 296-62-07722, which regulates employee information and training. WAC 296-62-07722 is available at [http://apps.leg.wa.gov/wac/default.aspx?cite=296-62-07701](http://apps.leg.wa.gov/wac/default.aspx?cite=296-62-07701). This WAC does not apply to flooring professionals, such as retail salespersons, who do not work at the job site or handle removed material as they would not have occupational exposures to asbestos. This WAC does apply to flooring professionals, such as onsite estimators, removers and installers, and inspectors who work at the job site or handle removed material.


inspectors. These inspectors are listed in phone directories under “Asbestos Consulting and Testing.” Recycling facilities may require asbestos survey reports and may not accept owner’s written statements.

After collecting the required documentation, flooring professionals should review documentation to verify that proposed work will not disturb ACM. Proceed with caution only after determining documentation is acceptable.

## During Carpet Removal

To ensure that it will be acceptable to recyclers, carpet should be free of asbestos, surface debris (e.g., construction debris, worksite garbage), and attached materials, such as sheet vinyl, vinyl tiles, other resilient flooring, tack strip, and metal or wood transition strips.

### Strategies to Protect Carpet During Renovation

To the extent feasible, avoid contaminating the carpet with other materials (for example, construction mastics, other flooring, paint splatter, construction dust, joint compound, tape, and wall and ceiling texture) during demolition or renovation. Use the following strategies, where applicable, to reduce contaminants during renovation projects:

- Protect carpet with plastic sheeting/plywood/drop cloth.
- Keep other work areas clean to avoid transferring contaminants on shoes.
- Seal ductwork.
- Mask off doorways to other work areas.
- Remove carpet prior to other renovation work.

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## What to do if Carpet is Contaminated with Construction and Demolition Debris

Many of the decisions regarding carpet handling during a renovation project may be out of the control of the flooring professional. For instance, a homeowner may complete part of the demolition themselves or other contractors may work on the project simultaneously. The responsibility may fall to flooring professionals to educate home or building owners or prime contractors on what is required to ensure the carpet is safe to remove and eligible for recycling.

If carpet is contaminated with construction and demolition debris, obtain or review a copy of the project asbestos survey to determine whether the construction and demolition debris is ACM. If the debris is ACM, the carpet is not eligible for recycling, and a certified abatement company must abate the debris and carpet, including proper disposal. A list of certified asbestos abatement contractors for Washington State is on the L&I website. If the debris is not ACM, remove debris before carpet removal. If debris, such as paint, cannot be removed, the carpet may not be recyclable. Check with the recycler.

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Confirm that any necessary asbestos abatement has been completed before conducting further work in the building.

**Removal of Glued-down Carpet**

It is highly likely that the removal of glued-down carpet (includes carpet glued to the carpet cushion or to the floor) will disturb underlying material. Since construction mastic is a suspect material and removing glued-down carpet necessitates disturbing the mastic, an asbestos survey is always required for glued-down carpet. If carpet is glued to other layers of suspect ACM flooring, those layers of flooring must be included in the survey. If the survey identifies asbestos in the mastic or other ACM –like vinyl asbestos tile- that will be disturbed during removal, a certified abatement company is required to abate those materials, including the carpet.\(^{23}\) If the suspect materials are found not to contain asbestos, then proceed with removing the carpet in a manner that minimizes attached materials and meets the requirements of the carpet recycling company.

**Removal of Stretched Carpet**

Because removing stretched carpet does not inherently require disturbing suspect material, the steps to remove stretched carpet depend on whether suspect material is present and whether removing the carpet is likely to disturb the material. If suspect material is present and likely to be disturbed, an asbestos survey is required. For example, carpet removal that will include removing tack strips that are nailed through sheet vinyl would require an asbestos survey.\(^{24}\)

If suspect material is disturbed in the process of removing stretched carpet and the worker does not have the required training or equipment to handle the situation, workers should exit the area and immediately notify the building owner, project supervisor, and/or the prime contractor. Untrained workers should not enter the site until a Certified Asbestos Supervisor has evaluated the situation and determined the appropriate response.\(^{25, 26}\)

After it has been determined that activities to remove stretched carpet will not disturb suspect material and/or suspect materials likely to be disturbed have been tested and found not to contain asbestos, remove carpet in a manner that minimizes debris and other contaminants and meets the requirements of the carpet recycling company. Before removing carpet, clear debris, such as pins and needles and coins, off carpet. If removing tack strips, collect them in the cardboard box that contained the new tack

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\(^{23}\) To prevent a sampling bias, the abatement company should not be the same as the asbestos survey company.

\(^{24}\) There are some differences in regulation between PSCAA and L&I. According to correspondence with each agency, PSCAA allows that removing tack strips nailed through suspect material may not disturb the suspect material, while L&I considers any removal of tack strip from suspect materials as disturbance or potential for disturbance.

\(^{25}\) Guidance in this paragraph was provided by PSCAA and L&I agency representatives. According to PSCAA, owners who occupy their single family residence as their primary domicile may determine that a suspect material does not contain asbestos by conducting an asbestos survey in accordance with procedures contained in EPA regulations (40 CFR 763.86). However, L&I requires that contractors only accept surveys conducted by accredited inspectors, according to WAC 296-62-07721 (2)(b)(ii)(A), [http://apps.leg.wa.gov/WAC/default.aspx?cite=296-62-07721](http://apps.leg.wa.gov/WAC/default.aspx?cite=296-62-07721).

strip or bundle them with tape or twine. Remaining debris should be collected in garbage bags or vacuumed.

**After Carpet Removal**

**Keep Carpet Dry During Transportation and Storage**

The carpet recycler will likely have a transportation company they work with, be associated with a waste or recycling collection company, or expect the flooring professionals to haul the carpet to the recycling facility. Keep the carpet in a covered container prior to and during transportation to the recycler to protect it from moisture.
Appendix A: Asbestos Regulations

This appendix presents asbestos regulations that apply to the work that flooring professionals perform. Enforcement of federal asbestos regulations is delegated to two types of agencies in Washington State: Washington Department of Labor and Industries (L&I) and local air pollution agencies or regional offices of the Washington State Department of Ecology. L&I’s mission is to protect worker safety and health in Washington State. The objective of air pollution agencies is to promote clean air and protect the climate for the benefit of public health and the environment. This document was developed with direction from L&I and the Puget Sound Clean Air Agency (PSCAA), which has jurisdiction in King, Kitsap, Pierce, and Snohomish counties. To find your local clean air agency, refer to the Washington State Department of Ecology’s website, http://www.ecy.wa.gov/programs/air/local.html.

Washington Department of Labor & Industries

*Washington State Administrative Code Chapter 62*

The rules contained within WAC 296-62 aim to protect employee health and build healthy work environments through the creation of communications and standards that control health hazards. WAC 296-62-077, *Part I-1, Asbestos, tremolite, anthophyllite, and actinolite* applies to occupational exposures to asbestos, even if the material contains 1% or less asbestos, and, therefore, is not classified as ACM.


*Washington State Administrative Code Chapter 65*

Standard WAC 296-65 establishes regulations regarding the removal and encapsulation of any material containing more than 1% of asbestos by volume. Asbestos projects require notification, certified contractors, and minimum training for project supervisors and workers. Additionally, the standard establishes a training course approval program.


Puget Sound Clean Air Agency

*Article 4: Asbestos Control Standards*

This section of PSCAA Regulation III includes definitions of terms and provides guidance on asbestos surveys, notification requirements, disposal of asbestos-containing waste, removal requirements, procedures for asbestos projects, and compliance with other rules.

Appendix B: Resources

Northwest Carpet Strategy Project – Co-led by King County Solid Waste Division LinkUp and Seattle Public Utilities
http://your.kingcounty.gov/solidwaste/linkup/carpet/project.asp

Finishing Trades Institute
http://www.ftifloorcovering.com/

Washington State Floor Covering Association
http://www.wsfca.org/

Carpet America Recovery Effort (CARE)
http://www.carpetrecovery.org/

U.S. Department of Labor Occupational Safety & Health Administration (OSHA)
Asbestos Information
http://www.osha.gov/SLTC/asbestos/

U.S. Environmental Protection Agency (EPA)
Asbestos Information
http://www.epa.gov/asbestos/

Washington State Department of Labor and Industries (L&I)
Asbestos Removal Requirements
http://www.lni.wa.gov/tradeslicensing/licensingreq/asbestos/

Contractor and Building Owner Information: Asbestos in Construction

Safety resources
http://www.lni.wa.gov/safety/

Puget Sound Clean Air Agency (PSCAA)
Asbestos and Demolition
http://www.pscleanair.org/regulated/asbestos/

Dealing with Asbestos – Renovation Procedures for Homeowners

Washington State Department of Ecology
State Asbestos Regulations and Guidance

Asbestos Waste Menu
Appendix C: Specification for Carpet Removal and Recycling

This appendix reflects guidance in the main body of this document and is intended to be used by contracting agencies as a stand-alone document in flooring contracts. The regulatory requirements referenced in these Best Practices are specific to the State of Washington, and serve only as guidelines for other parts of the US; we recommend that contracting parties verify the regulatory requirements applicable in their state and modify this specification as appropriate.

Specification
The flooring professional, or contractor, shall reclaim all carpet for recycling except when the contracting agency, or purchaser, agrees recycling is impractical or the removed flooring is deemed unacceptable by recycling facilities. For instance, exceptionally soiled/contaminated carpet or carpet with asbestos present may be deemed unacceptable.

Training
The contractor and their staff who will work on the project shall attend an asbestos awareness training.27

Asbestos Statement or Asbestos Survey Report
The purchaser shall provide, or obtain from the building owner, 1) a written asbestos statement reflecting that suspect materials either are not present or are present but will not be disturbed by carpet removal activities, or 2) an asbestos survey report. The purchaser shall provide a copy of the written asbestos statement or the asbestos survey report to the contractor. If the recycling facility requires it, the purchaser shall provide an asbestos survey report from an accredited inspector.

Contamination Prevention Prior to Carpet Removal
To the extent feasible, the contractor must avoid contaminating the carpet with other materials (such as construction mastics, other flooring, paint splatter, construction dust, joint compound, tape, and wall and ceiling texture) during demolition or renovation.

If carpet is contaminated with construction and demolition debris prior to carpet removal, the contractor shall not begin work and shall immediately notify the purchaser. The purchaser will conduct an asbestos survey, or review the current asbestos survey, and provide a report to the contractor. If ACM is found, the carpet is not eligible for recycling and the purchaser will pursue asbestos abatement by a certified abatement company. If there is no ACM, the contractor should remove the construction and demolition debris before removing the carpet. If any debris, such as paint, cannot be removed, the contractor should contact the recycling facility to verify that the carpet is acceptable for recycling.

Contamination Prevention during Carpet Removal
The purchaser will conduct an asbestos survey for glued-down carpet and adjacent flooring materials. If the survey identifies asbestos in the mastic or in other ACM (such as vinyl asbestos tile) that will be disturbed during removal, the purchaser will hire a certified abatement company to abate those materials, including the carpet.28 If the suspect materials are found not to contain asbestos, the purchaser shall provide the survey report to the contractor. The contractor may remove the carpet in a

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28 To prevent a sampling bias, the abatement company should not be the same as the asbestos survey company.
manner that minimizes attached materials and meets the requirements of the carpet recycling company.

If suspect material is disturbed in the process of removing stretched carpet and the worker does not have the required training or equipment to handle the situation, workers should exit the area and immediately notify the contracting agency, building owner, and project supervisor/prime contractor. Untrained workers should not enter the site until a Certified Asbestos Supervisor has evaluated the situation and determined the appropriate response.29 30

Storage, Transportation, and Recycling of Carpet
The recycler will likely have a transportation company they work with, be associated with a waste or recycling collection company, or expect the contractor to self-haul. The contractor should keep carpet in a covered container prior to and during transportation to the recycler to protect it from moisture. The contractor must obtain proof of recycling from the recycling facility and provide to the purchaser upon request.

29 Guidance in this paragraph was provided by PSCAA and L&I agency representatives. According to PSCAA, owners who occupy their single family residence as their primary domicile may determine that a suspect material does not contain asbestos by conducting an asbestos survey in accordance with procedures contained in EPA regulations (40 CFR 763.86). However, L&I requires that contractors only accept surveys conducted by accredited inspectors, according to WAC 296-62-07721(2)(b)(ii)(A), http://apps.leg.wa.gov/WAC/default.aspx?cite=296-62-07721.

Appendix D: Owner’s Asbestos Statement Form

The building owner, or the owner’s agent, must fill out this form and give it to the contractor/flooring company before receiving a bid or estimate for the work to be completed.  

Today’s Date: ______________________

Building Owner and Worksite Information

Contact information:

Name: ________________________________ Company name (if applicable):

Email: ________________________________ Phone number: ________________________________

Address of worksite: ________________________________ Mailing Address (if different from worksite):

____________________________________

____________________________________

____________________________________

Dates of work to be performed: ______________________ To ______________________

Description of work to be performed: __________________________________________

____________________________________

As the building owner, in reference to the above address and work to be performed, I am:

☐ Reasonably certain that suspect asbestos-containing material (ACM) is not present or that the work that I am commissioning will not disturb suspect materials.

☐ Not certain that suspect materials will not be disturbed and am providing an asbestos survey of the work area.

Owner or Owner’s Agent

I certify that, to the best of my knowledge, the above statement is correct.

Name (print): ________________________________ Title: ________________________________

Signature: ________________________________ Date: ________________________________

Flooring Company or Contractor

I certify that I have received a copy of this statement and associated asbestos survey, if applicable.

Name (print): ________________________________ Title: ________________________________

Signature: ________________________________ Date: ________________________________

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31 Contractors must be provided the owner’s statement or asbestos survey before they apply or bid on work, according to WAC 296-62-07721 (2)(b)(iii), http://apps.leg.wa.gov/wac/default.aspx?cite=296-62-07721.