

## Asbestos Management Program

# **Table of Contents**

- Purpose
- Overview
- Asbestos Contact Person
- Asbestos Consultant
- Asbestos Survey
- Asbestos Operations and Maintenance Plan
- Project List
- Abatement Procedures
- Removal of Asbestos Roofing Material
- Removal of Vinyl Asbestos Floor Tile
- Lists of Consultants and Contractors
- Insurance
- Conflict of Interest
- References

#### **Purpose**

The objective of this policy is to provide guidelines for managing asbestos in College facilities.

#### **Overview**

Asbestos abatement work must be conducted pursuant to approved procedures and requirements of appropriate regulating agencies as specified in Chapters 255 and 469, F.S., 40 CFR 763, and 40 CFR 61.

All buildings containing asbestos materials are subject to monitoring and periodic inspections until all asbestos containing materials have been removed and the removal and required records are documented. A current approved asbestos survey for each building and a campus-wide Asbestos Operations and Maintenance (O&M) Plan must be maintained by the College, in accordance with state and federal regulations. Operations and Maintenance, or in-place management, is the primary method of managing asbestos-containing materials. Removal or other forms of response actions shall be required in advance of renovation/remodeling or demolition activities and in specific instances where O&M is deemed inappropriate. The scope of asbestos removal work shall include, to the extent reasonable, all friable and non-friable asbestos-containing materials within the area that is to be isolated during the removal process.

#### Asbestos Contact Person

The College shall appoint an asbestos contact person(s), who shall be responsible for administering asbestos projects and monitoring facilities containing asbestos materials. The Contact person shall be the Director of Environmental Health and Safety. The contact person(s) has the right to review and comment on all asbestos documents and abatement activities performed for the College by any

contractor or consultant. Such review is to protect the College community's health by assuring best industry practices are utilized.

#### **Asbestos Consultant**

Each asbestos removal project shall be conducted under the direction of a Florida licensed asbestos consultant who shall be responsible for:

- Developing project specific technical plans, specifications, & drawings for all jobs
- Preparing asbestos surveys, O&M plans and bid documents
- Evaluating the bidders' qualifications and bid prices
- Enforcement of provisions in contract documents concerning and during asbestos removal
- Air sampling and analysis including:
  - o work area
  - o ambient
  - o final clearance
- Continuous on-site monitoring of project from initial disturbance of asbestos through final air clearance

#### Asbestos Survey

Asbestos surveys meeting current State of Florida and federal requirements shall be conducted prior to any building renovation/remodeling or demolition. The College Asbestos Contact Person may authorize abbreviated sampling of suspect material for projects of less than 160 square feet or 260 linear feet and asbestos response actions related to O&M activities. Partial or limited surveys prior to renovation/remodeling projects may be appropriate with the concurrence of the College Asbestos Contact Person and the licensed asbestos consultant.

#### Asbestos Operations and Maintenance Plan

The College shall develop, implement and maintain an Asbestos O&M Plan for asbestos containing materials known or assumed to exist in the buildings as indicated by the asbestos survey. The O&M Plan will apply to all facilities identified as having or assumed to have asbestos containing material and shall be kept current and documented in accordance with state and federal requirements.

#### **Project List**

The College shall maintain a list of asbestos abatement projects. This list shall be updated as necessary.

#### **Abatement Procedures**

Abatement of asbestos-containing materials shall be undertaken by a Florida licensed asbestos abatement contractor. All supervisors and workers shall be fully trained, qualified, and certified to perform the abatement activities that they are contracted to perform.

Internal College personnel qualified to undertake asbestos abatement work should be DBPR (formerly EPA accredited) accredited to conduct such work. All work undertaken by College

personnel shall comply with the approved O&M Plan and shall meet the same standards required of the licensed asbestos abatement contractor. If the work is greater than 160 square feet or 260 linear feet, all applicable abatement contractor licensing and monitoring requirements shall be followed. Work conducted by College personnel shall be conducted in accordance with all federal and state requirements, including all notifications, training, monitoring and documentation.

Procedures outlined in the regulations of Occupational Safety and Health Administration, the United States Environmental Protection Agency (EPA), the Florida Department of Environmental Protection (DEP), and Florida Department of Business and Professional Regulation (DBPR) and all other federal and state regulations shall be adhered to throughout all asbestos projects.

In some cases, removal of asbestos containing materials may not be the best response action. In instances where the risk of exposure is low and costs of complete removal are prohibitive (e.g. asbestos vinyl floor tiles or asbestos roofing felt), the Florida licensed asbestos consultant shall present the findings to the College Asbestos Contact Person, who shall determine what action is to be taken. In no case shall any asbestos containing materials be disturbed without the EPA required asbestos survey. The College shall be responsible for administration and management of its asbestos program in accordance with all applicable laws. The College president or designee, given sufficient justification from qualified College personnel, may choose to *exceed* the requirements of existing regulations, and this policy for any project the College deems appropriate.

#### **Removal of Asbestos Roofing Material**

All suspect roofing materials shall be sampled for asbestos content utilizing current State of Florida sampling criteria prior to disturbance or removal of the material. The roofing condition shall be assessed by a licensed Asbestos Consultant and a recommendation made to the College Asbestos Contact Person regarding appropriate response actions and use of a Florida licensed asbestos abatement contractor or a Florida certified roofing contractor. Bituminous resinous roofing materials are generally regarded as being less likely to release asbestos fibers; therefore, Florida Statutes allow removal by Florida certified roofing contractors. Roofing materials containing asbestos must be removed under the continuous inspection of an "on-site roofing supervisor," in accordance with Chapters 255 and 469, F.S.

#### **Removal of Vinyl Asbestos Floor Tile**

Vinyl asbestos floor tile shall be removed in compliance with Chapters 255 and 469, F.S. 40 CFR 763, and 40 CFR 61, and at the discretion of the Asbestos Contact Person and the Consultant.

#### Lists of Consultants and Contractors

Names and addresses of Florida licensed Asbestos Consultants may be obtained by writing:

The Department of Business and Professional Regulations, Office of Listing and Labels, Northwood Center 1940 North Monroe Street Tallahassee, FL 32399-0755

A nominal printing and mailing fee will be required.

#### Insurance

Prior to the College entering into any asbestos abatement contract, the College shall ensure compliance with Section 255.56, F.S.

### **Conflict of Interest**

Before an asbestos contractor is hired, an asbestos consultant shall first be retained to design and prepare the abatement project specifications (under separate contract and independent of the influence from the asbestos contractor). There must be no conflict of interest between the contractor and consultant. Any changes to project specifications shall be provided in the form of addenda issued by the consultant after review and consultation with NCF the asbestos contact person.

Pursuant to Section 255.558, Florida Statutes the contractor shall provide to the College asbestos contact person a notarized form indicating no conflict of interest.

#### References

- 1. Florida Statutes 255.551 255.565, 469.001 469.014
- 2. 40 CFR 763; EPA Worker Protection Standard
- 3. 40 CFR 61; NESHAP