

**TO: ALL COUNTY PERSONNEL**  
**FROM: VERDENIA C. BAKER**  
**COUNTY ADMINISTRATOR**  
**PREPARED BY: RISK MANAGEMENT**  
**SUBJECT: ASBESTOS MANAGEMENT PROGRAM**  
**PPM #: CW-L-010**

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<u><b>ISSUE DATE</b></u>	<u><b>EFFECTIVE DATE</b></u>
September 2, 2020	September 2, 2020

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**PURPOSE:**

To establish an asbestos management program for County facilities and projects.

**UPDATES:**

Future updates to this PPM are the responsibility of the Manager of Employee Safety/Loss Control(ES/LC), under the authority of the Director of Risk Management.

**AUTHORITY:**

- Environmental Protection Agency, (EPA), 40 CFR 763, Asbestos, as may be amended.
- EPA, 40 CFR 763, Subpart E, Asbestos-Containing Materials in Schools, as may be amended.
- EPA, 40 CFR 763, Subpart G, Asbestos Worker Protection, as may amended.
- EPA,40 CFR 61, Subpart M, National Emission Standards for Asbestos, as may be amended.
- Occupational Safety and Health Administration (OSHA), 29 CFR 1910.1001, Subpart Z, Toxic and Hazardous Substances, as may be amended.
- OSHA, 29 CFR 1910, Subpart I, Personal Protective Equipment, as may be amended.
- OSHA, 29 CFR 1926.1101, Subpart Z, Safety and Health Regulations for Construction, as may be amended.
- Section 469.001-469.014, Florida Statutes, Asbestos Abatement.

**DEFINITIONS:**

**Asbestos:** Asbestos is a naturally occurring mineral composed of long, thin fibers. It was, and still is, used in many building components for its fire, friction, and chemical resistant properties. Asbestos is not hazardous when its fibers remain intact and do not become airborne. Asbestos can become hazardous when its matrix is disturbed, crumbled, or dissolved (referred to as friable

asbestos) which may release fibers into the air. It is the inhalation of these microscopic fibers that may lead to certain health effects.

**Asbestos Work Request:** The Asbestos Work Request form (AWR) is a one-page form created by Risk Management for all departments to use when requesting asbestos-related surveys, abatements, cost estimates, and sampling. It is available on the Intranet under Countywide Forms/Risk Management.

### **POLICY:**

It is the goal of the County to minimize the potential health risk to County employees and the public from the presence of asbestos-containing materials (ACM) through implementation of a long term asbestos management program for County-owned/operated/or controlled facilities. All County projects that involve asbestos must follow applicable health, safety, and environmental regulations.

Any employee with questions about the possible presence of asbestos in their workplace should contact ES/LC for further information.

### **RESPONSIBILITIES**

- A. Risk Management's ES/LC** has the overall planning and managing responsibility for the County's Asbestos Management Program. ALL asbestos-related work must be authorized by ES/LC.
- B. Facilities Development & Operations** (hereafter referred to as FD&O) is responsible for initiating Asbestos Work Requests to ES/LC regarding all County building renovations, demolitions, cabling, and roofing projects except as noted in Items C-H below. FD&O is responsible for ensuring its Contracts and Contractors adhere to all applicable asbestos regulations. FD&O's Strategic Planning section is responsible for ensuring FD&O's divisions adhere to the Asbestos Management policy.
- C. Department of Airports (DOA)** is responsible for initiating Asbestos Work Requests to ES/LC regarding all renovation, demolition, and roofing projects for facilities under its jurisdiction, including DOA acquired properties. DOA is responsible for ensuring its Contracts and Contractors adhere to all applicable asbestos regulations.
- D. Department of Housing and Economic Sustainability (DHES)** is responsible for initiating Asbestos Work requests to ES/LC for applicable projects in its demolition, capital improvements, and rehabilitation programs. DHES is responsible for providing project management support and interfacing with the site owners/occupants, contractors, and consultants to facilitate the work to be completed.
- E. Engineering Department** is responsible for initiating Asbestos Work Requests to ES/LC for surveys and abatements of acquired structures within its roadway

construction program and for bridge renovations and demolitions.

- F. Fire Rescue (FR)** is responsible for initiating Asbestos Work Requests to ES/LC for station renovations, demolitions, and all training burns.
- G. Planning, Zoning, and Building Department (PZ&B)** is responsible for initiating Asbestos Work Requests to ES/LC for structures to be surveyed and abated prior to demolition under its various code enforcement programs and municipalities' agreements.
- H. Water Utilities Department (WUD)** is responsible for initiating Asbestos Work Requests to ES/LC for all its facilities' renovations, demolitions, and roofing projects not covered by FD&O and for repair and/or removal of asbestos-cement pipe, excluding small-scale (<260 linear feet) emergency repair/removal of asbestos-cement pipe by WUD's trained, in-house Operations & Management (O & M) employees.

## **PROCEDURES:**

### **I. Asbestos Work Request/ Work Authorization Process**

To ensure asbestos-containing materials are removed safely, all requests for asbestos related work (e.g. surveys, abatements, sampling, etc.) must be formally provided to ES/LC by completing an Asbestos Work Request/Work Authorization form. Forms are available on the PBC Intranet site under Countywide Forms\Risk Management. All Asbestos Work Requests must include the proper Account Number and be signed and dated in BLUE ink by the appropriate Department/Division Director.

#### **A. Asbestos Work Request (AWR)**

The requesting department must complete a review of the anticipated work to evaluate if asbestos-containing materials (ACM) or suspect ACM will be disturbed. ES/LC, FD&O, or other authorized group will evaluate existing building asbestos survey(s), if applicable, to determine the appropriate course of action. Review of existing asbestos surveys is recommended, yet should be used with caution because the material may not have been sampled or may not be in the same original condition. Contact ES/LC if there are any questions.

For projects managed by FD&O, Strategic Planning, or its appointee, completes the request and forwards to ES/LC. For projects managed by departments other than FD&O, the request will be generated by the division responsible for management of the overall project.

In all cases, the requesting department shall complete Section I of the form, including: a department contact and a facility contact who can provide access to the building/sites and interface with the occupants.

## **B. Work Authorization**

Upon receipt of the Asbestos Work Request from the requesting department, ES/LC will review for sufficiency, obtain a competitive not-to-exceed cost estimate from the Asbestos Consulting Firm and/or Asbestos Abatement Contractor, and return the form to the requesting Department for authorization. Authorization includes the completion of Section I on the form: Account Number or Budget Availability Statement (BAS) and the signature and date in BLUE ink by the requesting Department Director. This signed, original form is to be scanned in high resolution color and emailed to ES/LC to initiate the project.

ES/LC will forward the awarded request to Facilities Services for processing of the consultant services agreement and/or work order and issuance of the “Notice to Proceed.” ES/LC is responsible for ensuring the work is completed.

When the final work report is received and reviewed by ES/LC, a copy of it will be provided to the requesting department.

Project invoices will be reviewed and approved by ES/LC, and then forwarded to FDO’s Strategic Planning for payment.

## **II. Building Asbestos Surveys**

### **A. County-owned Facilities**

#### **1. *Building Asbestos Survey***

ES/LC will ensure that County-owned facilities are surveyed to identify the location and condition of ACM. This survey report is to be kept on-premises for vendors, maintenance, and employees to review as needed.

#### **2. *Re-Inspection***

The condition of ACM can deteriorate, resulting in the release of fibers. Periodic re-inspections of previously surveyed buildings that contain friable ACM will be coordinated and documented by ES/LC with the original building survey. The frequency of ACM re-inspection will be specified in the building’s Operations and Maintenance (O&M) Program.

#### **3. *Operations & Maintenance (O&M)***

The purpose of an O&M program is to minimize the possibility of disturbance of

ACM within surveyed buildings and to protect workers and other building occupants from potential asbestos exposure. The O&M program for each surveyed facility will be included with the asbestos survey report and will state specific custodial, maintenance, and vendor procedures regarding ACM. Further, as indicated above, the O&M program will specify the required frequency and schedule for re-inspections.

ES/LC in cooperation with FD&O and/or the responsible department will ensure that specific O & M procedures are developed, monitored, and managed for all surveyed, County-owned facilities.

#### **4. *Renovations***

All renovation activity that could disturb identified or suspect ACM must receive authorization to proceed prior to any work activity, using the Work Request/Work Authorization process. Renovation includes but is not limited to: floor tile repair or removal; HVAC ductwork replacement; relocation of walls, doors, or windows; and major and minor room renovations.

#### **5. *Demolitions***

Prior to any demolition activity, Federal law requires that the structure be surveyed for the presence of ACM. Identified ACM (i.e. regulated or potentially friable material) must be abated (removed) prior to demolition. These activities are coordinated through ES/LC via the Asbestos Work Request/Work Authorization process.

Departments who issue construction documents will ensure said documents state that the demolition contractor is required to follow all Federal, State, and Local asbestos regulations. Further, ACM abatement contractors must be insured, licensed and properly trained and must provide supporting documentation.

### **B. Non-County Owned Structures**

Structures which fall under the County's responsibility and/or authority, although not specifically owned by the County, must be surveyed for the presence of asbestos prior to renovation or demolition activity. The County department overseeing the structure will follow the Asbestos Work request procedures stated previously in this PPM, as well as any O&M procedures for ACM that remain in place. Refer to Section V for these Department-specific situations.

## **III. Asbestos Control Measures**

### **A. New Construction, including Renovations and Repairs**

All County departments involved with new construction, renovations, and/or maintenance repair activities shall ensure that no products containing asbestos in any form are used in or on County projects. All building construction and maintenance products shall be asbestos-free.

**B. Control Measures in Unsurveyed Buildings**

Prior to completion of a building asbestos survey, if a suspect building material is disturbed (e.g. ceiling tile collapse) or could be disturbed by maintenance, cabling, or renovation activity, supervision should immediately contact ES/LC and FD&O's Strategic Planning (if maintenance is provided through FD&O). For Departments that do not utilize FD&O for their maintenance work, their employees must notify their equivalent maintenance entity and ES/LC for resolution and guidelines.

**C. Control Measures in Surveyed Buildings**

Building Managers, maintenance personnel, and custodial workers must be instructed to report any observed deterioration of ACM to his/her supervisor, who in turn will immediately notify ES/LC and FD&O Strategic Planning. For Departments that do not utilize FD&O for their maintenance work, their employees must notify their equivalent maintenance entity and ES/LC for resolution and guidelines.

Custodial activities involving asbestos-containing floor materials are specifically controlled. Sanding of asbestos-containing tile is prohibited. Stripping of finishes is to be conducted with low abrasion pads at speeds lower than 300 rpm using wet methods. Dry buffing or burnishing may be performed only on floor tile that has a sufficient finish so the pad cannot contact the asbestos-containing material.

Vendors scheduled to perform intrusive work (e.g., drilling through walls for cable) are not permitted to do so until approved to proceed by ES/LC, FD&O Strategic Planning, or other maintenance entity depending on the facility involved.

It is important that the Building Manager or the department overseeing the vendor's work ensures that the vendor is aware of and satisfies the requirements of the County's Asbestos Management and O&M Programs.

**D Corrective Actions**

Corrective Actions are approaches taken to prevent disturbance of identified ACM. Disturbance may be the result of planned or emergency maintenance and repairs, renovation, demolition, or cabling activity. There are three basic Corrective Actions: abatement (removal), enclosure/encapsulation, and Operations & Maintenance (O&M). ES/LC will determine the best approach for controlling exposure to asbestos in County facilities.

**1. Abatement**

Abatement (removal) of ACM is a permanent solution. In situations where abatement is warranted, work will be performed by qualified contractors approved by ES/LC operating in accordance with all applicable Federal, State and Local laws/regulations and with stringent regard for the health and safety of all persons. All ACM abatement contractors must be insured, licensed and properly trained and must provide supporting documentation. All work associated with asbestos abatement is coordinated through ES/LC.

2. ***Operations and Maintenance Program***

ACM in good condition is best left undisturbed. When ACM is kept in place, an O&M program is instituted to monitor the ACM over its lifetime to ensure that asbestos fiber release does not occur.

3. ***Enclosure / Encapsulation***

Enclosure and encapsulation of ACM are not preferred options by ES/LC when abatement is available.

**IV. Special Conditions**

**A. Roofing**

All roofing materials are presumed asbestos-containing materials (PACM) until proven otherwise. The physical process of roof removal and replacement may impact the building's interior due to vibration. This vibration may disturb possible ACM. Therefore, all re-roofing projects require an interior asbestos survey prior to commencement. The requesting department must follow the Asbestos Work Request/Work Authorization process as stated in Sections I and II of this PPM.

In addition, all construction documents affecting roofing shall contain the following requirements:

1. Utilize a Florida-licensed roofing contractor under the direction of an onsite roofing consultant who meets the training requirements of section 469.012, Florida Statutes. The trained onsite supervisor must be present onsite at all times during the roof removal and loading process; and
2. All new and replacement roofing materials (including flashings, mastics, coatings, shingles, felts, paints) must be asbestos-free.

**B. Asbestos-Cement Pipe**

Asbestos-cement pipe (ACP) may be encountered during excavation for roadways, building construction, or Water Utilities Department (WUD) projects. All work involving ACP must be approved by ES/LC, following the Asbestos Work Request/Work Authorization process. One exception to the pre-authorization process is

WUD's emergency response to a line break in ACP (<260 linear feet) which must be immediately repaired. WUD has a group of employees trained to properly remove and handle such ACP. Refer to Palm Beach County Water Utilities Department Environmental Health and Safety Emergency Asbestos Cement Pipe Removal and Disposal, PPM #WUD-O-039, for more information.

## **V. Department-Specific Situations**

In addition to renovations and demolitions, the below-listed departments have asbestos-related situations unique to them:

### **A. Department of Housing and Economic Sustainability (DHES) Demolitions:**

DHES funds several community development programs that assist in improving housing, infrastructure, and blighted conditions. When demolitions are funded by DHES, the structure **must be surveyed** for asbestos, regardless of its current or former use, and abated, as required, prior to demolition.

Asbestos abatements shall comply with all Federal, State and local asbestos regulations.

DHES is to initiate the Asbestos Work request to ES/LC for all surveys and abatements.

All Demolition projects require EPA/DEP NESHAP Notification.

Upon receipt of a completed application for demolition from a participating entity, DHES shall request ES/LC for an asbestos survey of the structure to be demolished. Properties receiving clearance for demolition from Risk Management subsequent to Risk Management receipt/review of an asbestos survey may proceed to demolition, while properties found to have asbestos containing materials requiring abatement prior to demolition shall not be demolished until after such abatement has been accomplished.

### **Renovations:**

When rehab is funded and overseen by DHES, the structure must be surveyed for asbestos, regardless of its current or former use, and abated as required. The exception is that single-family residential structures of one to four dwelling units with no previous non-residential use are not required to be surveyed or abated prior to renovation. In this case DHES's responsibility is to inform the homeowner who shall inform the contractor that the structure has not been surveyed for the presence of asbestos and that ACM may be present. Renovation projects require EPA/DEP NESHAP notification if the amount of Regulated Asbestos-Containing Material (RACM) is over the threshold amounts of 260 linear feet of pipe, 160 square feet on all other surfaces and at least 35 cubic feet if unable to measure linear feet or square feet.



Asbestos abatements shall comply with all Federal, State and local asbestos regulations. The type of structure involved and the degree of County involvement determine the extent of the abatement and who will conduct it: County, homeowner, or non-County entity.

DHES is to initiate the Asbestos Work Request to ES/LC for all surveys and abatements. DHES is to provide project management support and interface with the site owner/occupant, contractors and consultants to facilitate the work to be completed. Surveys and abatements undertaken by non-County entities funded by DHES or Federal Funding must be reviewed and approved by ES/LC.

**B. Planning, Zoning, and Building (PZ&B)**

PZ&B/Building Division oversees the program for demolition of unsafe, abandoned, and/or condemned structures. Regardless of the structure's former use (single family residence, multi-family dwelling, commercial building, or multi-use facility), when the project is County funded or when using one of the County's contracted demolition contractors, the structure must be surveyed for ACM and abated, when necessary, prior to demolition. PZ&B is to initiate the Asbestos Work Request to ES/LC for all surveys and abatements. PZ&B is to also provide project management support and interface with the site owners/occupants, contractors and consultants to facilitate the work to be completed.

**C. Department of Airports (DOA)**

DOA acquires structures during its acquisition of property for expansion or noise abatement. These structures, regardless of their former use (single family residence, multi-family dwelling, commercial building, or multi-use facility), are required to be surveyed for ACM and abated, when necessary, prior to demolition. DOA is to initiate the Asbestos Work Request to ES/LC for all surveys and abatements. DOA is to provide project management support and interface with the site owners/occupants, contractors and consultants to facilitate the work to be completed.

**D. Fire Rescue (FR)**

Fire Rescue periodically burns structures as part of their firefighters' training. Asbestos regulations require all structures that will be burned intentionally to be surveyed for and abated of all ACM prior to the scheduled burn. FR shall initiate the Asbestos Work Request to ES/LC. FR is to provide project management support and interface with the site owners, contractors and consultants to facilitate the work to be completed.

**E. Water Utilities (WUD)**

Water Utilities encounters underground pipes made of asbestos-cement. When situations arise where this pipe must be repaired, cut, and/or removed from the ground, WUD is to initiate the Asbestos Work Request to ES/LC. Emergency repair of small

sections (<260 Linear feet) of asbestos-cement pipe (ACP) can be completed by WUD's trained ACP Emergency Response Crew Employees. Following completion of the repaired line, WUD is to contact ES/LC for proper disposal of the ACP by a Florida licensed Asbestos Abatement Contractor. Refer to Palm Beach County Water Utilities Department Environmental Health and Safety Emergency Asbestos Cement Pipe Removal and Disposal, PPM #WUD-O-039 for more information.

## **VI Training**

- A. Asbestos Awareness Training will be provided by ES/LC. It will be conducted as required for specific job positions and for maintenance personnel who may encounter ACM as part of their jobs.
- B. Asbestos Cement Pipe Training for WUD's O&M employees to include the ACP Emergency Response crew will be provided by ES/LC annually or as needed.

## **VII. Recordkeeping**

ES/LC will maintain all asbestos-related documents for County-owned facilities according to prescribed record retention schedules.

Duplicate copies of County-owned facility asbestos surveys and abatement reports will be maintained by FD&O or the applicable departments in section V.



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**VERDENIA C. BAKER**  
**COUNTY ADMINISTRATOR**

### **Supersession History**

1. PPM # CW-L-010, effective 2/28/1989
2. PPM # CW-L-010, effective 2/1/2008
3. PPM # CW-L-010, effective 11/7/2013