
ASBESTOS ROOFING COMMON QUESTIONS

Broward County Natural Resources Division

Asbestos Program

1. **What are the requirements for the removal of regulated asbestos containing roofing materials?**

Step 1:

A Statement of Responsibilities Regarding Asbestos (SRRA), submitted via Broward County's Portal <https://ePermits.broward.org>, is required to obtain a Certificate of Submittal necessary for a building permit to remove asbestos containing asphalt/bituminous roofing products and asbestos cement shingles/panels under one or more of the following conditions:

- (1) 160 square feet of friable asbestos containing roofing materials will be removed.
- (2) 5,580 square feet of nonfriable asbestos containing materials such as built-up roofing will be removed using a rotating blade cutter or other equipment that sands, grinds, cuts, or abrades.
- (3) 160 square feet of nonfriable asbestos/cement roofing products will be removed using techniques that will create friable asbestos containing material (ACM).
- (4) If it's Friable and over 160 sq. ft., an asbestos contractor will have to abate it since the roofing asbestos supervisor is limited to non-friable Category II material removal.

If any of the above conditions are met, an Asbestos Contractor is required for the removal and would be following the procedure for step 2.

NOTE: A SRRA is required for **any** roofing renovation project. If any of the above conditions are met, you will also have to follow Step 2.

NOTE: Friable ACM means the material that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

The Owner, Operator, Contractor or representative of a Residential Building with 4 or fewer dwelling units is only required to submit an SRRA via the web portal: <https://ePermits.broward.org>, no SRRA fee is due if the building is used for residential purposes only.

2. **What paperwork must be submitted prior to removing regulated asbestos containing roofing materials?**

Step 2:

In addition to Step 1:

- a. A Notice of Demolition or Asbestos Renovation Form (DEP Form) may also be required to NRD's Asbestos Program at least ten (10) working days prior to starting the removal of regulated asbestos containing roofing material, **OR**
- b. An asbestos survey certified by a Florida Licensed Asbestos Consultant (Showing No Asbestos Detected)

3. **What is the asbestos fee for the removal of regulated asbestos containing built-up roofing material and regulated asbestos cement shingles/panels? The fees below are in addition to the \$100.00 SRRA fee for demolition or renovation projects of commercial, industrial, residential buildings with 5 dwellings or more, condominiums, etc. (After the Fact SRRA fee \$200.00)**

Built-up Roofing Removal equal to or greater than five thousand five hundred eighty (5,580) square feet if using a rotating blade roof cutter or other equipment that sands, grinds, cuts, or abrades:

Electronic Notification via FDEP's Business Portal ...\$200.00

Submittal of Adobe PDF or Paper Notifications ...\$250.00 (After the Fact Notification Fee \$1,000.00)

Note: A Roofing contractor can submit a Notification to perform the roofing removal in lieu of an Asbestos Survey only if non-abrasive removal techniques are utilized.

The After the Fact penalty may apply for not complying with the asbestos requirements. Please note that no roofing fee is required if an Asbestos Survey is submitted that was certified by a Florida Licensed Asbestos Consultant and shows No Asbestos Detected.

4. **Are asbestos fees always required for removing asbestos built-up roofing materials or asbestos cement shingles/panels?**
No. Asbestos fees are not required if you are removing less than the threshold amounts of regulated asbestos containing materials listed in questions #1.
5. **Who must be accredited to remove regulated asbestos containing built-up roofing materials or regulated asbestos cement shingles/panels?**
The asbestos roofing supervisor.
6. **When would an individual not have to be accredited by the DBPR?**
When removing less than the threshold amounts stated in question #1. When using manual tools for the removal of asbestos built-up roofing material. When removing asbestos cement shingles/panels intact or when the material does not become regulated.
Please note that the OSHA Asbestos Construction Standard, 29 CFR 1926.1101, requires every individual involved in the removal of asbestos containing roofing products to have asbestos training. For additional information on OSHA requirements, click the U.S. Department of Labor Occupational Safety and Health Administration weblink: <https://www.osha.gov/asbestos>
7. **Does the accredited asbestos roofing supervisor have to stay on-site during the removal of regulated asbestos containing roofing material?**
An accredited asbestos roofing supervisor shall be on-site at all times when the removal of regulated asbestos containing roofing material is being conducted.
8. **Does the accredited asbestos roofing supervisor have to stay on site during the removal of nonregulated asbestos containing roofing material?**
No. However, the OSHA Asbestos Construction Standard, 29 CFR 1926.1101, requires a competent person, who has been asbestos trained, to make on-site inspections at "intervals sufficient to assess" whether conditions have changed and at any reasonable time an employee requests such an inspection. For additional information on OSHA requirements, contact the Florida Department of Labor.
9. **Can the accredited asbestos roofing supervisor make a decision to remove regulated asbestos containing roofing material without wetting the material if it is not feasible or it will create a safety hazard?**
The National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos requires prior written approval for removal of regulated asbestos containing material without wetting. The person requesting approval for dry removal must submit a written application along with all pertinent data justifying the need for dry removal to NRD's Asbestos Program (AsbestosSurvey-Notice@broward.org).
For additional information on OSHA requirements see: <https://www.osha.gov/asbestos>
10. **Can an accredited asbestos roofing worker perform asbestos abatement work?**
No, an accredited asbestos roofing worker is limited to Class II activities involving the removal of asbestos containing roofing products.
11. **Can an accredited roofing supervisor perform asbestos abatement work?**
No, an accredited asbestos roofing supervisor is limited to Class II activities involving the removal of asbestos containing roofing products.

12. **Are there other references that discuss roofing issues and regulatory requirements?**

Yes, click the following Florida DEP website:

<https://floridadep.gov/air/permitting-compliance/content/asbestos-faq#roofing>

for more information on Regulatory Requirements for Conducting Asbestos Containing Roofing work in Florida.

OSHA WORK CLASS DESCRIPTIONS

In order to protect workers and building tenants, OSHA regulates asbestos exposure in all work as defined in 29 CFR 1910.12(b). Asbestos work is broken down into the following classes:

Class I asbestos work means activities involving the removal of Thermal System Insulation (TSI), surfacing Asbestos Containing Materials (ACM), and Presumed Asbestos Containing Materials (PACM).

Class II asbestos work means activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

Class III asbestos work means repair and maintenance operations, where ACM, including TSI and surfacing ACM and PACM, are likely to be disturbed.

Class IV asbestos work means maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste, and debris resulting from Class I, II, and III activities.