DJ.Sollis (Survey Services) Ltd

Asbestos Management Survey Preliminaries

2013

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Executive Summary

- This part of the Asbestos Management Report covers the survey preliminaries and general notes. The contents of this part of the report should be read in conjunction with the Asbestos Register for each property surveyed.

- Where asbestos containing materials (ACM's) have been identified or presumed in the areas covered by this report. Those materials identified or presumed will have an effect on the future maintenance of the building. Please refer to later notes regarding survey limitations - only asbestos aware contractors should be used for future repairs and maintenance works.

- This report and the Asbestos Register should be made available to every employee and contractor in order to ensure that no accidental damage to an Asbestos Containing Material can take place.

- Full details can be found in the main body and report summary pages of the Asbestos Register report.

General Survey Details

Client Name:

Property Details:

Report Author:

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Objectives

- To carry out a survey of the identified property to ascertain the potential locations of asbestos containing materials at the property.

- To include a risk assessment for each individual sample/inspection within the survey.

- Produce a report, based on this specification, for the property containing details of areas suspected and confirmed as containing asbestos, using floor plans if necessary and photographs of each inspection location.

- Highlight areas of concern, particularly those requiring urgent attention.

- Ensure that sample results are analysed by an accredited laboratory and that good practice procedures are in place to maintain the accuracy of the survey and corresponding results.

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Analytical Techniques

- Each area of the identified property was systematically inspected for the presence or likely presence of asbestos containing materials, this being a Management Survey - samples were taken for analysis as necessary.

- All surveys and samples are carried out in accordance with HSG264 and current best practice guidance issued by the Health and Safety Executive. Each surveyor having, as a minimum qualification, successfully completed the P402 Bulk Surveys and Bulk Sampling for Asbestos course organised by the British Occupational Hygienists Society.

- Where possible access to roof and ceiling voids was gained by using non destructive and non intrusive methods. Samples, if necessary, were taken in such a manner as to reduce the potential asbestos fibre release to an absolute minimum and treat every suspected material as asbestos until laboratory results were received.

- Photographs will be taken of each material inspected, unless otherwise indicated.

- Samples were taken to a UKAS accredited laboratory for analysis, that uses techniques as described in MDHS 77 to determine the type and relative proportional quantity of asbestos in each sample.

- No density tests were undertaken.

Types of Survey as described in HSG264

The following is an extract from HSG 264 describing the types of survey necessary under current HSE guidelines;

Management survey – previously Type2

43 A management survey is the standard survey. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

44 Management surveys will often involve minor intrusive work and some disturbance. The extent of intrusion will vary between premises and depend on what is reasonably practicable for individual properties, ie it will depend on factors such as the type of building, the nature of construction, accessibility etc. A management survey should include an assessment of the condition of the various ACMs and their ability to release fibres into the air if they are disturbed in some way. This 'material assessment' (see paragraphs 124–127) will give a good initial guide to the priority for managing ACMs as it will identify the materials which will most readily release airborne fibres if they are disturbed.

45 The survey will usually involve sampling and analysis to confirm the presence or absence of ACMs. However a management survey can also involve presuming the presence or absence of asbestos. A management survey can be completed using a combination of sampling ACMs and presuming ACMs or, indeed, just presuming. Any materials presumed to contain asbestos must also have their condition assessed (ie a material assessment).
Management surveys can involve a combination of sampling to confirm asbestos is present or presuming asbestos to be present.

46 By presuming the presence of asbestos, the need for sampling and analysis can be deferred until a later time (eg before any work is carried out). However this approach has implications for the management arrangements. The dutyholder bears potential additional costs of management for some non-ACMs. Any work carried out on 'presumed' materials would need to involve appropriate contractors and work methods in compliance with CAR 2006 irrespective of whether the material was actually an ACM or not. Alternatively, before any work starts, sampling and analysis can be undertaken to confirm or refute the presence of asbestos. The results will determine the work methods and contractors to be used. The 'presumption' approach has several disadvantages: it is less rigorous, it can lead to constant obstructions and delays before work can start, and it is more difficult to control, see A comprehensive guide to managing asbestos in premises. 'Default' presumptions may also lead to unnecessary removal of non-ACMs and their disposal as asbestos waste. Default presumptions may be suitable in some instances, eg 'small' or simple premises, as part of a client's management arrangements.

47 Surveyors should always endeavour to positively identify ACMs. A sufficient number of samples should be taken to confirm the location and extent of ACMs. It

is legitimate to reduce sample numbers where materials can be strongly presumed to be ACMs. However the default presumption option should be avoided where possible, as it can make managing asbestos more difficult for the dutyholder. Default presumption should only be used in circumstances where it is requested by the client and/or where access genuinely cannot be obtained.

48 When sampling is carried out as part of a management survey, samples from each type of suspect ACM should be collected and analysed. If the material sampled is found to contain asbestos, other similar materials used in the same way in the building can be strongly presumed to contain asbestos. Less homogeneous materials (eg different surfaces/coating, evidence of repair etc) will require a greater number of samples. The sample number should be sufficient to establish whether asbestos is present or not in the particular material. Sampling may take place simultaneously with the survey, or as in the case of some larger surveys, can be carried out later as a separate exercise.

49 All areas should be accessed and inspected as far as is reasonably practicable. Areas should include underfloor coverings, above false ceilings, and inside risers, service ducts, lift shafts etc (see Box 4). Surveying may also involve some minor intrusive work, such as accessing behind fascia and panels and other surfaces or superficial materials. The extent of intrusion will depend on the degree of disturbance that is or will be necessary for foreseeable maintenance and related activities, including the installation of new equipment/cabling. Surveyors should come prepared to access such areas (ie with the correct equipment etc). Management surveys are only likely to involve the use of simple tools such as screwdrivers and chisels. Any areas not accessed must be presumed to contain asbestos. The areas not accessed and presumed to contain asbestos must be clearly stated in the survey report and will have to be managed on this basis (see paragraph 46), ie maintenance or other disturbance work should not be carried out in these areas until further checks are made.

Box 4: Areas to be inspected as part of a management survey
All ACMs should be identified as far as is reasonably practicable. The areas inspected should include: underfloor coverings, above false ceilings (ceiling voids), lofts, inside risers, service ducts and lift shafts, basements, cellars, underground rooms, undercrofts (this list is not exhaustive).

50 Management surveys should cover routine and simple maintenance work. However it has to be recognised that where ‘more extensive’ maintenance or repair work is involved, there may not be sufficient information in the management survey and a localised refurbishment survey will be needed. A refurbishment survey will be required for all work which disturbs the fabric of the building in areas where the management survey has not been intrusive. The decision on the need for a refurbishment survey should be made by the dutyholder (probably with help from others).

Refurbishment surveys will be required for all work which disturbs the fabric of the building in areas where the management survey has not been intrusive.

The dutyholder will need to make the decision but probably with help from others.

Refurbishment and demolition surveys – previously Type3

51 A refurbishment and demolition survey is needed before any refurbishment or demolition work is carried out. This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. A refurbishment and demolition survey may also be required in other circumstances, eg when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.

52 There is a specific requirement in CAR 2006 (regulation 7) for all ACMs to be removed as far as reasonably practicable before major refurbishment or final demolition. Removing ACMs is also appropriate in other smaller refurbishment situations which involve structural or layout changes to buildings (eg removal of partitions, walls, units etc). Under CDM, the survey information should be used to help in the tendering process for removal of ACMs from the building before work starts. The survey report should be supplied by the client to designers and contractors who may be bidding for the work, so that the asbestos risks can be addressed. In this type of survey, where the asbestos is identified so that it can be removed (rather than to 'manage' it), the survey does not normally assess the condition of the asbestos, other than to indicate areas of damage or where additional asbestos debris may be present. However, where the asbestos removal may not take place for some time, the ACMs' condition will need to be assessed and the materials managed (see paragraph 124).

53 Refurbishment and demolition surveys are intended to locate all the asbestos in the building (or the relevant part), as far as reasonably practicable. It is a disruptive and fully intrusive survey which may need to penetrate all parts of the building structure. Aggressive inspection techniques will be needed to lift carpets and tiles, break through walls, ceilings, cladding and partitions, and open up floors. In these situations, controls should be put in place to prevent the spread of debris, which may include asbestos. Refurbishment and demolition surveys should only be conducted in unoccupied areas to minimise risks to the public or employees on the premises. Ideally, the building should not be in service and all furnishings removed. For minor refurbishment, this would only apply to the room involved or even part of the room where the work is small and the room large. In these situations, there should be effective isolation of the survey area (eg full floor to ceiling partition), and furnishings should be removed as far as possible or protected using sheeting. The 'surveyed' area must be shown to be fit for reoccupation before people move back in. This will require a thorough visual inspection and, if appropriate (eg where there has been significant destruction), reassurance air sampling with disturbance. Under no circumstances should staff remain in rooms or areas of buildings when intrusive sampling is performed.

54 There may be some circumstances where the building is still 'occupied' (ie in use) at the time a 'demolition' survey is carried out. For example in the educational

sector, refurbishment/demolition surveys may be conducted in schools or colleges during one closure period (eg holidays) and the work not undertaken until the next holiday period. Also, a demolition survey maybe conducted to establish the economic future or viability of a building(s). The survey results would determine the outcome. In such situations, the ‘survey’ will need extremely careful managing with personnel and equipment/furnishings being decanted and protected (as necessary), while the survey progresses through the building. Again, there should be effective isolation of the survey areas and the ‘surveyed’ area must be shown to be fit for reoccupation before personnel reoccupy (see paragraph 53)

General Limitations to the extent of the survey

Survey restrictions and caveats – extract from HSG264

55 The value and usefulness of the survey can be seriously undermined where either the client or the surveyor imposes restrictions on the survey scope or on the techniques/method used by the surveyor. Information on the location of all ACMs, as far as reasonably practicable, is crucial to the risk assessment and development of the management plan. Any restrictions placed on the survey scope will reduce the extent to which ACMs are located and identified, incur delays and consequently make managing asbestos more complex, expensive and potentially less effective.

56 In management surveys, surveyors should be properly prepared for accessing all reasonably practicable areas in all parts of the building (see Box 4). Potentially difficult to enter areas (including locked rooms etc) should be identified in the planning stage with the dutyholder and arrangements made for access (eg for work at height, rooms unlocked, doors/corridors unblocked etc). In situations where there is no entry on the day of the survey, a revisit should be made when access will be possible. Where there are health and safety risks associated with some activities (eg height, confined spaces), these should be adequately assessed and arrangements made to control them (see paragraphs 83–91). Any area not accessed (and where no other information exists) must be presumed to contain asbestos and be managed on that basis.

57 In refurbishment surveys, the area and scope of the work will need to be agreed between the dutyholder and the surveyor. In these surveys and in demolition surveys there should be no restrictions on access unless the site is unsafe (eg fire-damaged premises) or access is physically impractical. The level of intrusion will be significantly greater than with management surveys. It will include accessing structural areas, between floors and walls and underground services. Some areas may be difficult to gain entry to and/or may need specialist assistance or equipment. Access arrangements need to be fully discussed in the planning stage and form part of the contract, particularly where assistance has to be engaged. Where access has not been possible during refurbishment and demolition surveys, these areas must be clearly located on plans and in the text of the report to allow the refurbishment and demolition processes to be progressive in those areas. Any ACMs must be identified and removed at this time. It is now recognised that even with ‘complete’ access demolition surveys, all ACMs may not be identified and this only becomes apparent during demolition itself. Surveyors need to be competent to do all the relevant work and tasks in this class of surveys (see Section 2: Competence and quality assurance procedures). They will need some knowledge of construction, be able to carry out the work safely and without risk to health, have the correct equipment to do the work and have the appropriate insurance.

58 If any restrictions have to be imposed on the scope or extent of the survey, these items must be agreed by both parties and clearly documented. They should be agreed before work starts (eg at the preliminary site meeting and walk-through

inspection or during discussion (see paragraphs 77–78)) and are likely to form part of the contract. If during the survey, the surveyor is unable to access any location or area for any reason, the dutyholder must be informed as soon as possible and arrangements made for later access. If access is not possible, then the survey report should clearly identify these areas not accessed. Limitations should be kept to an absolute minimum by ensuring that staff are adequately trained, insured and have the appropriate equipment and tools.

Survey Specific Notes

- Access to live electrical equipment was not attempted.

- Certain areas may have been obscured by personal possessions and furniture, during the survey every attempt was be made to move aside these items to gain full access to all areas.

- Care must be adopted during major improvement, alteration or demolition works, if suspect materials are discovered which are not covered by the survey then additional sampling is recommended.

- Whilst every effort was made to locate the ceiling panels, wall partitions and other panels, which may have been constructed from asbestos containing material, none other than those detailed have been found. Some may have been missed due to repairs, alterations etc, where false and other finishes have been applied or where different specifications (including a possible mixture of asbestos and non asbestos) panels have been used in the same area.

- No air monitoring was carried out during surveys, however, great care was taken not to cause disturbance of the fibre or contamination of surfaces.

- This report has been written with reference to the various guidance notes etc issued at the time and describes circumstances at the survey site on the date of the survey.

- Fire doors and boiler flues were not inspected internally as this would have compromised their integrity.

- Any persons undertaking work within surveyed properties, or properties of the same plan type and age that can be assumed to be of similar construction, should be told of the presence and location of any asbestos containing materials. This briefing also applies to any other persons who come into contact with those elements within the property that contain asbestos.

- All of the recommendations contained within the reports are based upon assumptions made after consideration of the type of material, condition of the material its location, analysis result and type of use the area is though to be subjected to. However, statutory authorities or others could require amendments based on local knowledge, change in legislation, change of use or other conditions of criteria.

Risk Assessments

Risk Band A:

HIGH RISK MATERIAL REQUIRING URGENT ATTENTION:
The potential hazard arising from this category warrants urgent action. Immediate plans should be made for the removal of the asbestos containing material. If delay of removal is likely to occur the asbestos should be sealed/encapsulated and approved warning labels positioned to prevent accidental damage to the material.

Risk Band B:

MEDIUM RISK MATERIAL REQUIRING NEAR TERM ATTENTION:
This category indicates that deterioration in any of the contributory factors may result in fibre release. Therefore all asbestos should be removed on a programmed basis within a specific time scale – normally 12 months. The condition of the asbestos should be regularly monitored and, where necessary, sealed/encapsulated until removal takes place. Approved warning labels should be positioned to prevent accidental damage to the material.

Risk Band C:

LOW RISK MATERIAL REQUIRING REGULAR INSPECTION:
This category indicates the need for regular monitoring. Although the current risk of fibre release is low, this material may suffer deterioration through age/accidental damage. It is recommended that asbestos in this category is visually inspected on a six monthly basis to ascertain any change in condition. Where such a change occurs re-prioritisation to Risk Band B will be necessary. Approved warning labels should be positioned to prevent accidental damage to the material.

Risk Band D:

MINOR RISK MATERIAL REQUIRING ANNUAL INSPECTION:
This category indicates Low Priority. Visual inspections should be made on an annual basis to ascertain any change in condition. Where such a change occurs re-prioritisation to Risk Band C or B will be necessary. Approved warning labels should be positioned to prevent accidental damage to the material.

Risk band E:

NO ACTION REQUIRED.

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Documents to be read in conjunction with this report include;

Asbestos – The Survey Guide – HSG264
Introduction to asbestos essentials – HSG213
A comprehensive guide to managing asbestos in premises – HSG227
The management of asbestos in non-domestic premises – L127
Work with asbestos insulation, asbestos coating and asbestos insulation board – L28

All available from HSE Books – 01787 881165, and usually free to download from www.hse.gov.uk