Asbestos Management Plan

TAMWORTH Borough Council

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Introduction

1: Introduction

1.1 Introduction

This Asbestos Management Plan (AMP or Plan) sets out how Tamworth Borough Council manages the risks from asbestos containing materials (ACMs).

It sets out Tamworth Borough Council policy and procedures and is designed to effectively manage and minimise asbestos related health risks to personnel working at Tamworth Borough Council or occupying its premises.

Surveys for ACMs have been carried out at all Tamworth Borough Council sites. This information forms the basis of the current Register. Further surveys and re-inspections have been carried out related to specific projects or investigations. Where a survey has not been carried out ACMs are to be presumed present unless known otherwise.

The presence of an ACM does not in itself constitute a danger. However, the ACM may become hazardous when disturbed, damaged or degrades to an unsuitable condition and must be treated accordingly. Activities which give rise to airborne dust, e.g. breaking, sawing, cutting, drilling etc. are most likely to present risks.

Introduction

2: Policy

2.1 Policy

Tamworth Borough Council Policy is:

- To prevent exposure to the hazards associated with asbestos
- To promote awareness of the Asbestos Management Plan (AMP) and the hazards of asbestos, through training and induction of staff and those working on behalf of the Tamworth Borough Council
- To hold regular meetings with key groups to increase awareness of asbestos issues
- To provide and maintain an Asbestos Register
- To provide information and advice on asbestos issues
- To develop, implement and review an effective management strategy so that appropriate measures, such as sealing, labelling, inspection or removal of ACMs are undertaken
- To regularly review the AMP

The Plan complies with the Health and Safety at Work etc. Act 1974 and the Control of Asbestos Regulations 2012. The Plan, Policy and Procedures apply to all parts of the Tamworth Borough Council without exception. The Principles of the Plan also apply to all those workplaces used by Tamworth Borough Council staff.

2.2 Asbestos Management Plan

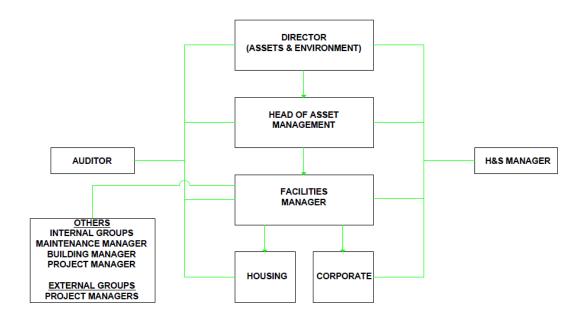
The Plan sets out the mechanism by which ACMs are managed. It includes details on how the Tamworth Borough Council intends to:

- Protect those working on the fabric of Tamworth Borough Council properties.
- Protect those working within or occupying Tamworth Borough Council properties.
- Effectively control any works likely to affect ACMs
- Identify and categorise ACMs and to manage these hazards based on prioritisation and assessment of the risk that they present
- Produce a prioritised programme for the remediation of ACMs that, because of their location and, or condition, present an actual or perceived risk to health
- Monitor and maintain the condition of identified ACMs that are assessed as being able to be left in-situ.

3: Organisation and Responsibilities

3.1 Asbestos Management Plan Implementation Chart

Key roles within Tamworth Borough Council organisation for implementation of the AMP are represented as follows:



Housing – John Murden Corporate - Barry Curtis

3.2 Responsibilities

- 3.2.1 The **Director (Assets and Environment)** is responsible for ensuring that:
 - The Asbestos Management Plan is implemented
 - The Plan and associated procedures are integrated into Tamworth Borough Council operating procedures
 - Where managers, supervisors and employees have been assigned specific asbestos management duties these are documented and implemented in accordance with the Tamworth Borough Council procedures
 - Tamworth Borough Council employs contractors for work with ACMs in accordance with procedures within the Plan.
 - An annual report is prepared for the Corporate Management Team of the Council.
 - Adequate resources are provided and allocated to carry out the Plan within the budget available to the Council
 - The necessary requirements for the safe management of ACMs are fully identified and incorporated into any design or specification for all those with responsibilities.
 - Adequate information regarding ACMs is sought for all potential purchases.
 - An adequate training plan should be prepared to reflect the needs of Council.
 - Any building purchased on behalf of the Tamworth Borough Council is free of ACMs, so far as is reasonably practicable
- 3.2.2 The **Head of Asset Management** is responsible for ensuring that:
 - Their Project Managers are aware of the Plan, and have the necessary skills to implement their responsibilities under the Plan.
 - Tamworth Borough Council employs contractors for work with ACMs in accordance with procedures within the Plan.
 - The necessary requirements for the safe management of ACMs are fully identified and incorporated into any design or specification to ensure all necessary training is implemented.
- 3.2.3 The **Health and Safety Manager** is responsible for:
 - Where reporting is not a requirement of a Main Contractor or similar, reporting incidents to the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
 - Providing advice and guidance to Tamworth Borough Council to ensure that competent contractors for work with ACMs are appointed in accordance with procedures within the Plan.
 - Collating Dangerous Occurrence Forms
- 3.2.4 The Facilities Manager is responsible for:
 - Monitoring the AMP implementation to ensure that working arrangements and provision of financial, technical, human and other resources are suitable and sufficient to meet its requirement
 - Tamworth Borough Council employs contractors for work with ACMs in accordance with procedures within the Plan.
 - Undertaking an auditing role on representative projects including aspects of Asbestos Manager, Asbestos Contractor and Analyst performance
 - Ensuring any breaches of compliance with the AMP are fully investigated.

3.2.5 The **Facilities Manager** is responsible for ensuring that:

- Information on ACMs is appropriately stored and is made available to all interested parties including Trade Unions
- Appropriate records of asbestos works are properly kept
- The Asbestos Register is maintained and regular audits of the Asbestos Register are undertaken
- Tamworth Borough Council employs contractors for work with ACMs in accordance with procedures within the Plan.
- Following risk assessment ACMs are assigned appropriate management options and priority actions are timetabled
- Arrangements are made so that Tamworth Borough Council employees have the necessary facilities, training and allied competencies to discharge the duties assigned to them under the Plan
- Arrangements are made so that all relevant personnel and organisations receive appropriate information, instruction and training related to ACMs and the existence and use of the Asbestos Register
- Regular meetings are held with relevant parties, e.g. Progress Meetings, Trade Union Liaison Meetings
- The performance of the Plan is annually reviewed and amended as necessary
- An annual Report on the Plan and related issues is submitted to the Director (Assets and Environment)
- Emergency procedures are established
- A list of Licensed Asbestos Removal Contractors and Analytical Companies approved for use on Tamworth Borough Council sites is maintained and monitored
- 3.2.6 **Project Managers.** For the purpose of this document a project manager is defined as any person co-ordinating works. The Project Manager is responsible for ensuring that:
 - Areas are assessed for ACMs at the feasibility stage of a project. Guidance on the assessment required is given in Appendix 7
 - Tamworth Borough Council employs contractors for work with ACMs in accordance with procedures within the Plan.
 - All appropriate actions within the AMP are implemented
 - Project changes are promptly reviewed with respect to asbestos information, for example where extension of project area, or changes to M&E installations occur. Actual reviews may fall within the remit of other project team members, such as the CDM Coordinator.
 - Any necessary works use the management service provided by the Facilities Manager or are managed to at least the same level as set out in 3.2.7
 - The Building Manager is informed of all relevant project information
 - All project personnel are informed of the location of any known ACMs affecting the project
 - Works are halted if suspect ACMs are discovered during the course of work and further advice is sought from the Facilities Manager.

3.2.7 The Facilities Manager is responsible for

Undertaking a range of tasks either on behalf of Facilities Management or, when specifically instructed, for a Project Manager. These tasks are:

	For Facilities lanagement	For Project Managers, under their specific instruction
General ACM Management		
Carrying out appropriate level of investigation or similar in response to an enquiry and providing a documented report		*
Identifying ACMs as required, undertaking formal risk assessment and updating the Asbestos Register		*
Ensuring that, where ACMs are removed, or remain in-situ under a monitoring regime the Asbestos Register is updated		*
Organising a regular audit of the Asbestos Register	*	
Assessing, reviewing and recommending management actions in light of inspection findings and changes in Regulations or current good practice	*	
Reviewing and amending where necessary standards of works detailed in the Tamworth Borough Council general specification for works with A	* ACMs	
Organising and undertaking a regular inspection of ACMs	*	
Recommending and specifying programmes of work for asbestos management specific projects	*	
Reporting incidents to the Director (Assets and Environment) and Health & Safety Manager - FM, and completing Dangerous Occurrences forms as necessary	*	*

	For Facilities Management	For Project Managers, under their specific instruction
Management of remedial works		
Preparing a specification for asbestos remedial works and issuing to the Project Manager		*
Recommending appropriate Asbestos Contractors and Analysts from a pre-assessed List		*
Assessing Asbestos Contractor's Plan of Works and recommending selection where applicable		*
Informing the Project Manager of asbestos remedial works implications		*
Assessing the appropriate level of analytical support and attendance		*
Informing appropriate staff of asbestos related works in good time via the Project Notification system		*
Making local arrangements with building users and service providers to facilitate the asbestos works		*
Organising where appropriate an asbestos contract pre-start meeting to agree the Plan of Works, attended generally by the Facilities Manager, Contractor and Analyst.		*
Reviewing method statement amendments with Contractor's Site Supervisor and senior Manager.		*
Ensuring site works comply with relevant Tamworth Borough Council r	requirements	*
Monitoring Asbestos Contractors to assess their compliance with statutory and Tamworth Borough Council requirements, reporting and deficiencies with the Head of Asset Management. The frequency of site method statement changes to be included in these reviews.	discussing	*
Stopping work where an Asbestos Contractor does not perform to the required health and safety standards, or where his actions appear likely to result in a breach of H&S or Tamworth Borough Counc	* il standards	*
Assessing, directing and assisting in access requirements as required, related to relevant air monitoring strategies		*

	For Facilities Management	For Project Managers, under their specific instruction
General and financial administration tasks		
Providing cost estimates for asbestos works		*
Tendering the asbestos works in accordance with Tamworth Borough Council Contracts Policy and Procedures		*
Preparing order information		*
Assessing invoices prior to authorisation by the Project Manager		*
Information, liaison and education:		
Reviewing with the Director (Assets and Environment) and Head of Asset Manag proposed regulatory changes and current standards of good practice	gemen <u>t</u>	
Providing expert advice on ACMs and their treatment to those with responsibility under this AMP	*	
Participating in the organisation and delivery of asbestos awareness seminars	*	
Attending Progress Meetings	*	
Maintaining regular dialogue with the Health & Safety Manager, including reports on visits and actions by the HSE, local authority environmental health and similar bodies	*	
Providing the HSE and similar bodies with details of asbestos management procedures and projects where relevant in accordance with instructions from the Health & Safety Manager. Details to be provided prior to project start, or on completion, as relevant. Contractors shall notify the HSE of any removal works as required.	*	
Providing specialist reports on budget, materials status, etc. as required, including an annual report to the Head of Asset Management.	*	

	For Facilities Management	For Project Managers, under their specific instruction
Record keeping:		
Updating the Asbestos Register	*	*
Updating asbestos drawings to the Tamworth Borough Council database		*
Ensuring that all statutory documents generated by the works are properly completed and a record kept	*	*
Keeping detailed project records relating to asbestos remedial or investigative works		*
Providing the Project Manager with an Asbestos Works Completion statement when appropriate		*

3.2.10 Asbestos Contractors are responsible for:

- Complying with current legislation, associated Approved Codes of Practice and Guidance and the Tamworth Borough Council AMP and Project Procedures
- Attending site to assess and prepare quotations against asbestos remedial works specifications, the Contractor to raise any issues relating to the health and safety aspects or potential costs of a project
- Providing a Plan of Work to the Project Manager and the Statutory Authority. This to include details of project resources and timetable and an emergency procedure discussed and agreed with the Project Manager
- Providing Statutory Notice to the Statutory Authority prior to commencing asbestos works, or, by agreement and at the request of the Project Manager, applying for a waiver from the minimum notice
- Attending the asbestos contract pre-Start meeting, Progress Meetings, and handover Meeting as required
- Carrying out regular inspections of the work environment, any defects found by or reported to the Project Manager or Analyst being rectified by the Contractor immediately
- Complying with all reasonable requests from the Project Manager
- Complying with Permits to Work
- Liaising with the Analyst to ensure the satisfactory progress of the works
- Providing copies of notification and consignment notes and other relevant documentation with final account to the Project Manager.
- 3.2.11 Analysts are responsible for:
 - Maintaining UKAS accreditation relevant to instructed tasks
 - Providing pro-active support to the Project Manager, but to a level which would not fall within the HSE requirement for a supervisory License.
 - When requested by the Project Manager,
 - Reviewing and commenting on asbestos works specifications and, prior to start of the works, on the Contractors Plan of Work
 - Providing quotations which reflect the anticipated project site and analytical requirements
 - Attending meetings, including but not restricted to, Pre-start, Project Progress and Handover Meetings.
 - Completing check lists, warning and advisory signs etc. as supplied by the Project Manager
 - Assisting with the application and completion of Tamworth Borough Council specified permits and warning signs etc, relevant to the asbestos remedial project, including hot works permits etc.
 - Carrying out analytical works and inspections as agreed with the Project Manager. Where site conditions alter, and the Project Manager is not immediately available, the Analyst to adjust the level of testing and inspection to ensure that all information relevant to the continued health and safety of the Contractor and building occupants is obtained
 - Reporting to the Project Manager any defects or non-compliances relating to the Contractors performance, including suitability of the work areas, adherence to the Plan of Work, Statutory Instruments and AMP. Where the Project Manager is not immediately available the Analyst to take any measures necessary to ensure the health and safety of the Contractor and building occupants
 - Checking areas on completion of asbestos remedial works to ensure that the Contractor has completed his scope of works and all affected areas have been left in a satisfactory condition

- 3.2.11 Analysts are responsible for, contd.:
 - Maintaining regular contact, as minimum at start and at end of each site day, with the Project Manager, regarding progress of site works
 - Reporting to the Project Manager any aspects of asbestos management encountered on site which could give rise to health risks
 - Providing daily written reports on project progress to the Project Manager; the reports to include such information, in excess of accreditation requirements, as requested by the Project Manager
 - Issuing formal Reports, including 4 Stage Clearance and Certificate of Re-Occupation, to the Project Manager on completion of site works.
- 3.2.12 **Heads of Department** are responsible for ensuring that:
 - All staff, students and visitors are aware of their individual responsibilities regarding this AMP
 - The department implements any measures deemed necessary by the Asbestos Manager
 - All departmental equipment, materials and apparatus containing ACMs is clearly identified, appropriately recorded and managed
 - New equipment or apparatus erected, installed, purchased or gifted on behalf of the department is free of asbestos material.
- 3.2.13 **Staff** are responsible for:
 - Reporting to the Help Desk, any known ACMs which are damaged or disturbed or any suspect ACMs of any condition and any defects or concerns they may have related to asbestos issues or remedial works
 - Contacting their Building Manager, or Project Manager where already appointed, regarding any work to be undertaken which may involve ACMs
 - Attending asbestos awareness training when so requested.
- 3.2.14 **Contractors** are responsible for:
 - Ensuring that they respond to, and maintain, all communications with their Project Manager
 - Compliance with the AMP and relevant procedures, and where acting as sole, main or principal contractor to have a thorough understanding of these procedures
 - Ensuring that all sub-contractors are informed of the AMP and relevant procedures, and are aware of the location of ACMs within the project area
 - Co-operating with any Licensed Asbestos Removal Contractors or associated contractors working within or adjacent the known or intended project area
 - Ensuring that emergency measures are in place for any suspected or known exposure to ACMs and that these are in line with Tamworth Borough Council procedures.

4: Procedures

4.1 Asbestos Management Procedures

Procedures are detailed within the Appendices.

Procedures are included within the formal Plan review and are amended as required.

Management Contacts

Key Contacts

All are based at Tamworth Borough Council,

Title and address

Name, phone and email details

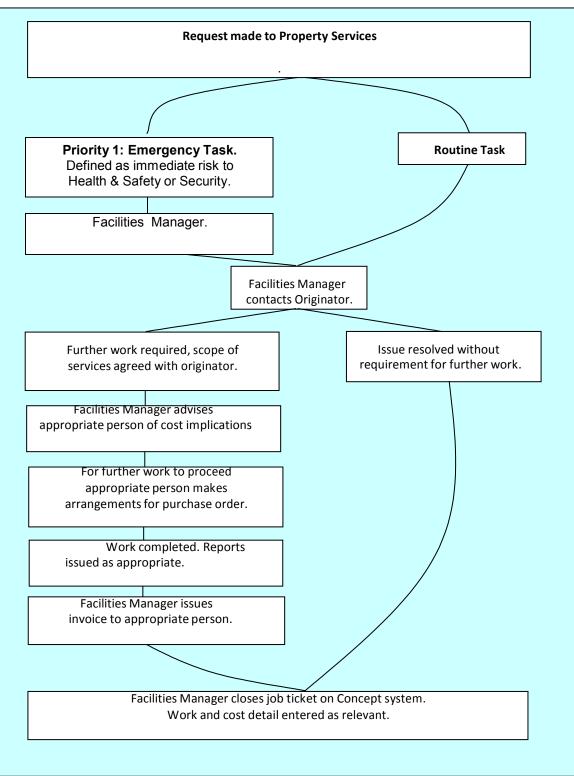
Director (Assets and Environment)

Head of Asset Management

Facilities Manager

Health and Safety Manager

Enquiries



Enquiries are routed as follows:

Identification of ACMs

Historical Background

Tamworth Borough Council wide survey data from 2013 has been, and continues to be, supplemented with information gained during local detailed surveys and investigations.

Surveys for ACMs

Priority areas for survey are identified by the Facilities Manager, generally in relation to planned maintenance tasks and refurbishment projects.

Surveys and re-inspections are carried out to comply with HSE guidance, for example, document HSG 264: The Survey Guide.

An appropriately accredited Inspection Body carries out surveys with the works managed by the appropriate Project Manager.

Survey types are detailed in HSG 264, a summary is given below

Management Surveys

Management surveys are intended to identify ACMs that could affect the normal occupation of a building. This includes ACMs that might be disturbed not only by regular maintenance activities, but also those affected by reasonably foreseeable activities such as cabling works in risers.

The 2010 HSG 264 guidance emphasises the benefit of thorough surveys, with attempts to be made to open up areas where maintenance or similar can be anticipated. Samples of suspect materials should be taken, although some level of 'presumption' and reduced sampling regimes are acceptable so long as the consequent management of identified or suspected ACMs is appropriate.

'Management surveys' fell under Type 1 and 2 survey descriptions in earlier HSE guidance (MDHS 100). The

current knowledge of ICL ACMs is at a level comparable with this 'Management Survey' definition. However the significant volume of survey work undertaken in the mid-1990s was generally to occupied buildings, this occupation may have caused Surveyors access problems with related limitations to the survey findings.

The HSE expects virtually all non-domestic premises to have Management Survey information already; this data is essential for the Duty holder to effectively manage ACMs and thus comply with the 'Duty to Manage' requirement stated in Regulation 4 of the Control of Asbestos Regulations 2006.

Identification of ACMs

Refurbishment surveys and demolition surveys

These surveys attempt to locate and describe all ACMs in a project area and are required well before any refurbishment or demolition is due. This type of survey is also required for what may appear, initially, as relatively minor work, for example, formation of a riser, or dismantling of heating plant. Prior to January 2010 these surveys were termed 'Type 3' in the HSE MDHS 100 guidance.

To enable this level of identification the area must be fully accessible to the surveyor and appropriate investigation techniques and equipment be employed. Survey planning is essential, to allow the Surveyor to understand the scope of the intended works, for any exclusions to the survey to be <u>agreed</u> with the Client, and for arrangements to be made to the clear and isolate the survey area. HSG 264 emphasises the need for the survey area to be isolated from building occupants and that, ideally, reoccupation after survey is not planned. However it recognises that this is not always achievable. Where the survey area is to be reoccupied assurance that it is acceptable for reuse should be obtained from the Surveyor.

Intrusive investigation works can be significant – making good after survey works is minimal unless requested otherwise. Suspect materials are sampled during the survey, and the extent of ACMs estimated. The condition of the ACM is generally not reported except where materials are damaged, if areas of asbestos debris may be expected, or if there will be a time delay between the survey and the intended refurbishment or demolition.

For a refurbishment/demolition survey to be successfully completed at least the following criteria must be met:

- area is unoccupied, with no intention to reoccupy after survey
- area is fully accessible with fixings, furnishings, and heavy equipment removed, or at least easily movable
- area is fully accessible in terms of decontamination sign-offs and other relevant authorisations
- suitable survey techniques are employed breaking through of partitions, opening up of floor voids, use of access platforms for high level areas etc.

If the conditions above are not met the survey will not be considered comprehensive; limitations will be noted in the Survey Report and arrangements will need to be made to undertake further survey work when the site conditions area appropriate.

The HSE recognise that unidentified ACMs may still remain in the survey area, thus appropriate controls need to be in place for the actual refurbishment period, and most certainly for any demolition works.

ACMS in Equipment

ACMs have frequently been used in scientific or technical equipment. Asbestos fibres have a range of properties - insulating, non-electrical conductive, resistance to acid – which made them suitable for many uses including within kilns, hot-boxes, packing, and electrical equipment.

It is the responsibility of the Head of Department to have asbestos containing departmental equipment, materials and apparatus clearly identified, appropriately recorded and managed.

Asbestos Register

Asbestos Register Content

The Register records known and suspected ACMs in Tamworth Borough Council managed properties. It contains information on their

- location
- extent
- condition
- labelling status

The Register is aligned with the recommendations of HSG 264 information recorded allows objective risk assessments to be carried out.

The Register also provides some detail on:

- non ACMs where, in the normal course of the building operation, they may be confused with ACMs
- areas, where known, which have not been surveyed.

The presumption must be made that ACMs may be present in all un-surveyed areas and for all surveyed areas where the location would not have fallen within the scope of the original 1994 survey inspection.

Drawings

Drawings may be used to illustrate the Register information; these will be colour marked up and subject to update procedures. Drawings are not currently part of the formal issued Register.

Storage

The Register is stored electronically on a remote server and accessed via the web. The Head of Asset Management holds current Register and archive Registers. The working Register copy is held by the Facilities Manager.

Availability

The Asbestos Register is available to all who may reasonably require such information. A version of the most recently issued Register is on a shared computer drive.

Updates

The Register is updated by the Facilities Manager, and regularly re-issued to the Head of Asset Management. Individuals, departments or organisations who affect data in the Register should supply relevant information to the Facilities Manager.

Update may be required after:

- Identification of further ACMs
- Surveys
- Removal of ACMs
- Inspection/monitoring exercises
- Changes in building layout or area use.

At the AMP review the Head of Asset Management will assess the range and quantity of amendments received.

Audit

Regular Register audits will be instructed by the Head of Asset Management. This will include comparison of representative Asbestos Register entries against site inspections and records of asbestos remedial works. The audit report will be made available to all relevant parties and will form part of the AMP Review.

Risk Assessment of ACMs

Assessment System

All ACMs in the Asbestos Register are objectively assessed by the Facilities Manager using a formal numerical scoring scheme. This considers aspects of materials assessment and priority assessment as described in the HSE document HSG 227 'A comprehensive guide to managing asbestos in premises'.

The materials assessment considers features of the material, the priority assessment takes into account the environment in which the ACM is found and the likelihood that persons may be exposed to asbestos fibres.

The scheme considers the following parameters:

- product type
- condition
- surface treatment
- asbestos type
- location
- position of material, for example how accessible it is during normal building occupancy
- susceptibility to damage
- number of people potentially exposed
- whether the material is subject to maintenance, refurbishment or other possible disturbance.

The Facilities Manager manages and keeps details on the scoring scheme and reviews the scores annually.

ACMs with higher assessment scores are likely to require greater consideration regarding remediation measures than those with lower scores.

Management of ACMs

Management of ACMs

Management options stated within the Asbestos Register are assigned by the Facilities Manager and are considered the appropriate choice at the time of Register review.

The final choice of asbestos management option is taken by the Head of Asset Management after consideration of the assessment score and discussion with relevant parties, for example, those with information on future maintenance or refurbishment plans.

Long term ACM maintenance considerations, including cost, resources, potential for exposure etc, will be taken into account and opportunities taken for removing materials, particularly during periods of building closure or refurbishment.

In general ACMs with higher risk scores will be identified for remedial works, whilst those with lower scores will be retained within the management scheme for in-situ materials.

Records of decisions made, together with any discussion and rationale supporting such decision, will be kept by the Head of Asset Management.

Inspection of ACMs

Formal re-inspections of known or suspected ACMs, will be carried out by a UKAS accredited Inspection Body and will be arranged and co-ordinated by the Facilities Manager. Re-inspection will require checking of known ACMs against Register information.

An outline scope of work may be prepared by the Facilities Manager for re-inspections; this may give requirements such as:

- Programming of the works
- Access arrangements
- Reporting arrangements

Re-inspection findings will be:

- Used to update the Asbestos Register
- Subject to formal risk assessment

The inspection period will be set by the Facilities Manager, taking into consideration a review of current risk assessments and previous inspection history. ACMs of higher score may be subject to more regular re-inspection than those of lower score.

The inspection period will be documented in the formal AMP Review and Action Plan.

Management of ACMs

Leaving ACMs in place

Where ACMs are in good condition and not disturbed during the normal use of premises particularly with minimal potential for fibre release, they may be left in-situ. The Head of Asset Management is responsible for ensuring these materials are kept in a sound condition.

Regular Inspection

ACMs left in-situ will be subject to an inspection regime. The Facilities Manager will determine the inspection period, likely to be 6 or 12 months dependent on risk assessment.

Labelling

Labelling with standard 'asbestos warning labels' or fixing of appropriate warning signage will be carried out to all known accessible ACMs considered to be of significant risk where this is deemed to:

- help prevent accidental damage, and
- not cause undue concern

Labelling of lower risk materials, for example, packing to soil pipes, seals to ductwork, may not be carried out if other control mechanisms e.g. site awareness, are considered adequate in preventing accidental exposure. Labelling within domestic dwellings does not normally take place.

Improvement works

Where the ACM has minor damage, simple repair and/or sealing (encapsulation), may be appropriate. The technique and materials used will be dependent on the ACM and may include over-cladding or use of liquid applied encapsulants. These encapsulants are typically polymeric applications which dry to give a robust water resistant surface. Repairs and any encapsulation measures will be undertaken by a Licensed Asbestos Contractor, with the local area being isolated, either by constructing an enclosure or using local exclusion techniques.

Management of ACMs

Removal of asbestos materials

The term 'removal' is used to describe both the removal of bulk materials and the decontamination of areas where debris or trace asbestos contamination has been identified.

Removal of ACMs is carried out as a result of:

- Such work being stated within the Action Plan
- Recommended works related to planned projects, or
 - Unplanned circumstances, for example: identification of high risk ACMs damage to ACMs ACMs subject to maintenance or building works not foreseen during the AMP Review.

The option to remove ACMs will be authorised by

- the Head of Asset Management for aspects of on-going management of ACMs
- the Project Manager for any specific building or project works.

The Project Manager will authorise the financial spend related to the removal works, the extent of such work will be based on recommendations given by the Facilities Manager or appointed advisor. The responsibility for arranging and co-ordinating asbestos remedial works lies with the Project Manager, it is anticipated that they will appoint the Facilities Manager to take on all relevant tasks. Further details are within Appendix 7.

Removal of ACMs is an operation with inherent risks and requires effective management. Consideration of building occupation, co-ordination with other projects, effective use of budget, etc. will be taken into account when arranging remedial works.

Remedial works planning must allow sufficient time for key stages, including:

- Agreement of scope of works
- Contractor's quotation period
- Method statement assessment
- Decant arrangements
- Statutory HSE notification
- Re-instatement requirements assessment
- Occupant Liaison meetings
- Pre-start meeting.

Management of ACMs

Completion of asbestos works

The Facilities Manager generally provides a completion document to the Project Manager, this will include:

- a clear summary of what materials have been removed
- project references
- contact and documentation details
- comment on residual asbestos risks

Remedial Works Records

These are held by the Facilities Manager, with relevant documents copied to the Project Manager.

Records include as minimum:

- Works specification
- Removal method statement
- Air monitoring reports
- Certificate of Re-Occupation with 4 Stage Clearance documentation (where relevant)
- Waste consignment notes

Records will be held for an appropriate period.

Disclosure of information

Initial requests to be made to the relevant Manager, for example Building or Project Manager, or Safety Office. Enquiries then to be routed, if required, to the Facilities Manager via the FM Customer Service Desk. Where relevant, for example where issues relate to health or financial aspects, the Facilities Manager will forward the request to the appropriate Tamworth Borough Council authority.

Management of ACMs

Minor asbestos removal works

Some works with ACMs may be carried out by in-house maintenance employees or regular Tamworth Borough Council Contractors not holding an HSE License for work with ACMs. These works will be of a minor nature and will be co-ordinated by the Facilities Manager.

Such works may include:

- Removal of compressed asbestos fibre (CAF) gaskets from pipe flanges
- Collection and proper disposal of asbestos cement (AC) debris or materials

Each type of work is to be notified in advance to the Facilities Manager for review. A record will be kept by the Facilities Manager of all reviews.

Where works are carried out by regular/term Contractors the key personnel will be expected to attend the appropriate Tamworth Borough Council asbestos awareness training session. These **'Preferred Contractors'**, likely to be a small number of companies, will have an enhanced awareness of Tamworth Borough Council procedures and knowledge of the site.

The Facilities Manager will hold a listing of these Preferred Contractors.

Project Management Procedures for all building works -

refurbishment, _maintenance, IT etc.

Work

For the purpose of this AMP the term 'work' is used for any activity that has the potential to affect the fabric, finishes or services of a building, or which requires entry to services areas or voids.

Review of work area

All works within the Tamworth Borough Council estate with the potential to alter or damage the fabric of the building, service voids, building services etc, must be reviewed by the Project Manager with regard to:

- Possible presence of ACMs
- Control measures to be taken to avoid damage or exposure
- Any necessary remedial/removal works
- Potential impact on project programme.

This review is to be at a level appropriate for the project in terms of its scale of refurbishment, known asbestos data, and regulatory requirements. The Project Manager is expected to seek guidance from the Facilities Manager, or equivalent, and make use of their specialist asbestos consultancy services where relevant.

Initial contact with the Facilities Manager should be via the FM Customer Services Desk. Additional information and/or site walks may be required to give the Facilities Manager a more informed picture of the project requirements.

The review must be carried out by the Project Manager at an early stage of the project to allow sufficient time for project implications of ACMs to be assessed. Discussions on project design and site inspections may be required dependent on scale of project.

Facilities Manager's Role

On receipt of the Work Request the Facilities Manager will assess the project and undertake, as relevant, the following:

- Assessment of cost of, and agreement on, scope of Asbestos Management Services
- Review of known ACM information
- Discussion on project detail with Project Manager
- Site walk(s) with Project Manager and/or relevant contractors
- Site investigation, such as a formal survey (See Appendix 3)
- Report issue.

A <u>preliminary Report</u> may be generated by the Facilities Manager for certain works, generally those related to larger or more complex projects.

Project Management Procedures for all building works -

refurbishment, _maintenance, IT etc.

Facilities Manager's Role contd.

The preliminary Report may include:

- Information on known ACMs
- Level of site investigation required, for example any requirement for management or refurbishment/pre demolition surveys, including their impact on occupants and project timetable
- Requirement for services isolations
- Requirement for space e.g. contractors welfare, decontamination unit, analytical office etc.
- Requirement for additional services e.g. use of a Licensed Scaffold Contractor to provide access.

The <u>final Report</u> style and content will be dependent on the complexity of the project and may range from an email to a Survey Report with marked up plans.

Guidance on remedial measures required, including any control measures, such as protection or further labelling of ACMs, and budgets may be included.

Recommendations made by the Facilities Manager for remedial action should be incorporated into the Project Works.

Implementing the recommendations of the Facilities Manager

Where remedial works are required these may include:

- Remedial/removal works being undertaken to ACMs NOT DIRECTLY affected by the project scope, but which lie within, or directly adjacent, the project location. The intention being to use the refurbishment period to improve the Tamworth Borough Council environment, with minimal disruption to building use. Such remedial works will normally be funded by the Project.
- Co-operation with programming of the works, for example, the preference that asbestos remedial works are carried out as a priority activity either prior to the Main Contractor taking possession of the site or at the start of the possession period.
- Assisting in making space available for asbestos remedial works equipment, such as parking for decontamination units (DCUs), appropriate office space for the Analyst.
- Arranging any necessary services isolations or enabling works such as steam shutdowns, cutting out of non-asbestos redundant ductwork, removal of fixtures, fittings, furniture or certain building features.

Project Management Procedures for all building works -

refurbishment, _maintenance, IT etc.

Informing Project personnel

Aspects to be considered include:

- Site handover arrangements comprising documentation such as the Facilities Managers Report, Asbestos Works Completion statements etc
- Site familiarisation walks with key personnel such as Site Foreman, Facilities Manager et al.
- Highlighting the requirement for asbestos information to be reviewed when project changes, such as M&E scope, or extension of project area, are proposed. The review to be undertaken by the appropriate Project team member, this may include the Main Contractor, CDM Coordinator and/or Project Manager.
- Particular attention to co-operation and co-ordination where Contractors who do not hold an HSE License for asbestos works are used for enabling works prior to asbestos remedial works being undertaken. It is essential that these 'non-asbestos' contractors are
 - aware of any risks and related controls
 - undertaking enabling works that are sufficient to provide necessary access etc for the future Asbestos Licensed Contractors works

Additional or suspect ACMs

The Project Manager is responsible for making sure works are halted if suspect ACMs are discovered and that further advice is sought.

In practice, it may be the Site Manager who takes the first action of stopping works to the affected areas, they should then contact the Project Manager. Further guidance would normally be obtained from the Facilities Manager however, in certain situations the Project Manager may consider that they have adequate knowledge, competency and experience to resolve the issue themselves.

Removal Works

Further details on the removal of ACMs is within Appendix 6.

Project stage summary/programme

The following gives <u>guidance</u> on typical projects where the Facilities Manager has been instructed to undertake a review/investigation etc. Workload, investigation constraints, HSE notification periods etc, will affect the actual programme.

The examples assume the Project Manager has supplied all relevant project information and there are <u>no</u> <u>delays</u> in accessing areas or decanting prior to asbestos removal works. The examples show that more complex projects can require at least 3 months planning prior to completion of asbestos related works.

Project Management Procedures for all building works -

refurbishment, _maintenance, IT etc.

	Description of work				
	New cable route.	Redecoration of a residence.	Maintenance work.	Reconfiguration of 1 office.	Refurbishment of 3 laboratories.
ltem	No asbestos remedial works required	ACMs present	Remove 2m section of asbestos lagged pipework	Asbestos ceiling tiles	Numerous ACMs
			Action in Week;		
Project Manager:					
Contact Help Desk	1	1	1	1	1
Facilities Manager:					
Agree services scope and management costs	1	1	1	1	1
Preliminary report	1 - 2	1-2	1-2	1 - 2	1 - 2
Survey	1 - 2	1 – 2	1-2	1 - 2	1 - 3
Report issued	1-2	1-2	1-2	2-3	3 – 4
Further survey e.g. 'Refurbishment/Pre- Demolition' in unoccupied areas	-	Not required	Not required	Agreed with Project Manager Assume Week 4	Agreed with Project Manager Assume Week 4
Remedial works required	None	None. Decorating contractor to receive site specific asbestos awareness	Remove asbestos insulation to pipework	Remove ceiling tiles	Remove bulkheads, fume cabinets and exhaust ducts
Remedial works specification	None	None	2	4	5
Appoint Contractor	-	-	3	6	8
Contractor:	-				
HSE Notice period	-	-	3 - 4	6-7	9 - 10
Site work start	-	-	5	8	10
Asbestos site works completed.	-	-	5	9	12

Specialist Contractors

Licensed Asbestos Removal Contractors

Remedial works to ACMs, including encapsulation, will generally be carried out by a Contractor holding a License under the Asbestos Licensing Regulations.

In specific circumstances non Licensed Contractors or Tamworth Borough Council employees may undertake work where this falls outside the asbestos licensing requirements and is of acceptably low risk. In these circumstances all relevant health and safety regulations, including provisions of the Control of Asbestos Regulations must be complied with. The Facilities Manager must review and accept proposed procedures and work methods.

Choice of Licensed Contractor

Contractors will be subject to in-house selection and approval procedures, co-ordinated by the Head of Asset Management.

Audits of Contractors undertaking work with ACMs will be carried out by the Facilities Manager. Such audits will include assessment of at least:

- Quality of completed work
- Safety issues throughout the remedial works
- Compliance with Contractor's own Safety Management systems
- Feedback and safety etc. information from the UKAS accredited Consultancy engaged for the associated inspection and analytical works
- Adherence to programme

Use of Advisory Services

Advice and services may be sought from external specialist organisations.

Only organisations holding the appropriate qualification and UKAS accreditation, for example to ISO 17020 for building surveys for ACMs or to ISO 17025 for analytical services, will be used.

Emergency Procedures

Definition of an emergency

Emergencies are unexpected situations requiring sudden and urgent action. In the context of asbestos the immediate measures taken should prevent or minimise exposure to airborne asbestos fibre. Following this action there may be a subsequent requirement to bring in specialist contractors such as an UKAS accredited Analytical Consultancy or Licensed Contractor. The Facilities Manager will assess and make suitable arrangements, and if appropriate inform the site manager and the Facilities Manager.

The following emergency situations are considered:

A Personnel in areas of potential elevated airborne asbestos fibre

For example:

- Known or suspected ACMs are damaged
- Asbestos remedial works cause an uncontrolled release of airborne fibres, for example if an asbestos removal work enclosure is damaged

Action to be taken:

- Do not disturb the material or stay longer in the affected area than is essential
- If the problem is within, or associated with, a Project area, contact the Site or Project Manager. The Site Manager will then contact the Head of Asset Management who will provide site specific advice.
- Notify the Health and Safety Manager.
- If the emergency relates to a damaged ACM, and it is safe and appropriate to do so, cover the material with polythene or other barrier to prevent disturbance by air currents.
- Seal off the area close windows, doors etc so long as this is possible without causing further disturbance to the material/staying longer in the area.
- Evacuate the local area and prevent others from entering the area by using signage, sealing up doorways or posting guards at an appropriate distance.

Additionally for Project Areas:

The Site Manager should halt all local works and take any necessary or recommended action. Such action may include informing staff and building occupants, clearing the area or site etc. The Project Manager must be informed of all developments.

General, contractor specific and site health and safety reporting procedures may be triggered by these events.

Where the emergency has been caused by finding damaged ACMs it is likely that the longer term action will be the removal of the material, with the costs borne by the project.

Emergency Procedures

B Non specialist personnel required to <u>enter</u> areas of elevated airborne asbestos fibre

For example:

- Plumbers or electricians are needed within known contaminated areas to carry out emergency services isolations
- Experts are required to enter asbestos work enclosures to give first aid

Action to be taken:

• Contact the Facilities Manager, via the Site Manager (for Project Works).

Access can only be given if the individual has received appropriate training, protective equipment and is accompanied by a Licensed Contractor or Analyst.

Emergency Procedures

Reports and Records

Tamworth Borough Council Dangerous Occurrence Report

Sample form held at the rear of the policy are to be used as Reports and are to be completed by the Individual/appointed representative or Project Manager and submitted to the Health and Safety Team..

Accidental Asbestos Exposure Form

To be completed whenever an Tamworth Borough Council employee considers they may have been exposed to airborne asbestos fibre. "Exposure" will generally be taken to mean exposure to a known or possible level approaching or exceeding a control limit.

The form will record information including

- Name
- Date and time of incident
- Nature of exposure (damage or work to ACM, uncontrolled release of asbestos fibre from asbestos removal enclosure etc.)
- Location of incident
- Type of asbestos fibre/asbestos material
- Duration and level of exposure
- Copies of any associated analytical records
- Details of advice etc given to individual (health risks of asbestos etc.)

The Facilities Manager will provide technical information and the Form will be reviewed, completed, and kept by the Human Resources. A copy will be given to the employee with the recommendation that it be kept indefinitely.

Where the exposure relates to non-Tamworth Borough Council employees the Facilities Manager will record known details, these will be kept within the Tamworth Borough Council Asbestos Management record system.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) where exposure

occurs above the control limits set in the Control of Asbestos Regulations the requirement to report the incident under RIDDOR will generally be assessed and carried out by the Health and Safety Team. If the exposure occurs in an area under the control of a Principal Contractor the reporting requirement is the contractors responsibility.

Contractor Safety Reports

Company generated reports should be copied to the Project Manager and forwarded by them to the Facilities Manager and the Health and Safety Team

Disclosure of information

The Health and Safety Team may request copies of any reports in order to carry out investigations into the underlying causes of the emergency

Requests from individuals or other parties should be made to the relevant Manager, for example Building or Project Manager. It is unlikely that information would be released unless for individual e.g. insurance, purposes or to provide anonymous data for consideration in the AMP Review.

Information and Training

Information

Information on the AMP and the management of ACMs will be available to all relevant personnel and organisations. General and Tamworth Borough Council specific information may be posted on relevant notice boards or produced for distribution in electronic format.

Where more specialist knowledge is required this may be sourced from specialist consultancies and publications, including HSE documents.

Training

It is acknowledged that effective management of ACMs requires knowledge of a specialised area of health, safety and construction works.

The Director of A&E shall ensure that a suitable level of expertise is available at Tamworth Borough Council, either by in-house training of employees, by using external training courses or resources, or by establishing a relationship with a specialist external organisation such as a UKAS accredited Consultancy.

The Head of Asset Management assesses training requirements and co-ordinates it's provision. The intention is to provide an open and responsive culture where individuals have an awareness of the risks and an appreciation of the effectiveness and suitability of, and requirement for, management procedures.

The key areas covered by in-house training sessions are:

AMP	purpose, general arrangements, availability and location responsibilities of employees and key groups
Asbestos Register	it's location, use and availability
ACMs	health effects their range and distribution at Tamworth Borough Council
Work practice	Safe systems and arrangements

It is acknowledged that risk groups, such as new employees, newly appointed contractors etc, may require asbestos awareness training or similar as part of their initial Tamworth Borough Council induction process.

In summary:

- Initial asbestos awareness/training will be carried out for relevant employees and contractors
- Continuing asbestos awareness/training will be carried out as necessary
- Problems or incidents with ACMs will be investigated and a review of training arrangements carried out if considered appropriate.

Information and Training

Outline of training topics

Training agenda will be amended as required, tailored to the requirements of the audience.

Торіс	Group			
	Maintenance, Security, Technicians etc	Consultants, Contractors	Employees with extra Responsibilities	
Asbestos health risks				
AMP and Procedures				
Responsibilities				
ACMs – uses and distribution at Tamworth Borough Council				
Procedures for building works				
Advanced knowledge				

Employees considered to have extra responsibilities includes:

- Head of Asset Management
- Director A&E
- Health & Safety Manager
- Building Managers

Advanced knowledge may include formal qualification in health and safety or asbestos specific topics.

Information and Training

Training for specific tasks with ACMs

Where employees are expected to carry out works with ACMs specific training will be provided. Such

tasks may include:

- Removal of compressed asbestos fibre (CAF) gaskets (to flanges, soil pipe joints etc)
- Collection of asbestos cement debris
- Labelling of ACMs
- Emergency sealing off/decontamination of areas following disturbance to ACMs.

The Head of Asset Management will keep details of training agenda, training dates and which individuals have been trained for specific tasks.

Training review

The Head of Asset Management will review the training arrangements annually to assess if:

- All individuals/department/groups requiring training have been identified
- Re-training requirements are adequate
- Tamworth Borough Council induction arrangements are adequate
- Course content is appropriate.

Action Plan

Action Plan

The Action Plan will contain priorities and timetables or targets for both remedial works e.g. removal works and non-remedial works e.g. training issues, survey requirements.

Consideration of a timetable for remedial works will take account of several factors including:

- ACM risk assessment score
- Building occupation constraints
- Financial resources
- Other planned building works.

The Head of Asset Management will review the Action Plan; the Plan will be finalised by the Director (Asset and Environment).

Action Plans will be included within the AMP Review, and later retained as archive documents, kept by the Head of Asset Management.

Review of the Asbestos Management Plan

Review purpose

The Head of Asset Management will arrange a regular review of the AMP.

The intention of the review will be to assess:

- Management procedures and their effectiveness.
- Effectiveness of the management plan in terms of its integration into all matters relating to the building fabric and use
- Overall progress made against the Action Plan
- Suitability and maintenance of communication, instruction, training of personnel, employees and contractors
- Suitability and success of record keeping tasks

Significant findings and comments will be reported to the Director of A & E. A record of the Review will be kept by the Head of Asset Management.

Review Timetable

The Head of Asset Management will set the timetable and date of the next review. A Review will be:

- Carried out on a 12 monthly basis
- Considered when significant events occur for example, on completion of major asbestos removal projects, following exposure of personnel to significant airborne asbestos fibre levels, transfer or increase of premises, or if arrangements within the AMP are no longer considered to be adequate.

Review Attendees

The Head of Asset Management will invite appropriate representatives.

Review Agenda

The Head of Asset Management will set the Agenda and will distribute to all relevant personnel in sufficient time for data and feedback to be collated.

The agenda will include some or all of the areas set out below:

AMP

Compliance with HSE and Tamworth Borough Council procedures Management and Organisation structure Audits and Reports Action Plan Remedial Works Asbestos Register Asbestos awareness/training Incidents with ACMs HSE reports

Key regulatory documents

	Asbestos Regulations
SI No. 2739	Control of Asbestos Regulations 2006
	Asbestos – Approved Codes of Practice and Guidance
L143	ACoP – Work with Materials containing Asbestos (1 st Ed) (2006)
L127	ACoP – The Management of Asbestos in non-domestic premises (2006)
HSG 53	The selection, use and maintenance of respiratory protective equipment (2005)
HSG 247	Asbestos: The Licensed Contractors guide (2006)
HSG 248	Asbestos: The analysts guide for sampling, analysis and clearance procedures (2005)
HSG 189/2	Working with asbestos cement (1999)
HSG 213	Introduction to Asbestos Essentials (2001)
HSG 210	Asbestos Essentials – Task Manual (2001)
HSG 227	A comprehensive guide to managing asbestos in premises (2002)
HSG 264	Asbestos: The Survey Guide (2010)
	Medical Series
MS 13	Asbestos: Medical Guidance Note (4 th Edition) (2005)
	Health and Safety – Approved Codes of Practice and Guidance
L73	A guide to Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (2008)
	Waste Regulations
SI No. 988	Waste (England and Wales) Regulations 2011
SI No. 894	The Hazardous Waste (England and Wales) Regulations 2005
	The List of Wastes (England) Regulations 2005. As Amended by the 2011 Regulations.
SI No. 1056	The Waste Management Licensing Regulations 1994 as amended 2003
SI No. 2092	Carriage of Dangerous Goods (Carriage, Packaging and Labelling) & Use of Transportable Pressure Receptacles Regulations 1996