



Aston University

Asbestos Management Plan

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SECTION 1. INTRODUCTION

This document is designed to assist compliance with Regulation 4 (Duty to manage asbestos in non-domestic premises) of the Control of Asbestos Regulations 2006. It is a clear proposal of how the risks associated with the asbestos-containing materials identified on site are to be managed.

This Asbestos Management Plan sets out how Aston University manages the risks from asbestos-containing materials (ACMs) at their sites in Birmingham.

Over the course of the last ten years the site has been subjected to various asbestos surveys. However, in 2008 a site wide type II asbestos survey has been conducted in order to update existing records; details of findings can be located in the Estates Department.

Where a survey has not been carried out, ACMs are to be presumed present unless known otherwise. Further localised sampling may need to be commissioned in the future to confirm (or otherwise) the presence of ACMs in areas not included in the surveys.

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

SECTION 2. POLICY

It is recommended that the following policy be adhered to:

- 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 Aston University
- To provide and maintain (i.e. keep up to date) the asbestos registers
- To develop, implement and review an effective management strategy so that appropriate ongoing measures such as sealing, labelling, inspection and/or removal of ACMs are undertaken by specialists as appropriate
- To regularly review the AMP

In addition to Aston University maintenance staff, the principles of the plan will take into consideration external contractors, temporary staff and other visitors who are also likely to come into contact with or work in close proximity to identified ACMs.

SECTION 3. ASBESTOS MANAGEMENT PLAN

The AMP sets out the mechanism by which ACMs are managed. It includes details on how Aston University intends to:

- Protect those working on the fabric of the buildings within the site
- Protect those working within or occupying the estate
- Effectively control any works likely to affect ACMs
- Use the priority assessment scoring system within the type II asbestos survey report to 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 to remain in situ

SECTION 4. IDENTIFICATION OF ACMs

Surveys and re-inspections are carried out in line with HSE guidance (MDHS100 'Methods for Determination of Hazardous Substances – Surveying, sampling and assessment of asbestos-containing materials').

Survey types are detailed in MDHS 100 and HSG 227 'Managing asbestos in premises', a summary is given below:

Type II (standard sampling, identification and assessment surveys):

- Generated in order to provide a detailed and accurate register of ACMs within a property. Typically a Type II survey is commissioned to assist compliance with regulation 4 of CAR2006 (duty to manage) and/or is chosen prior to redecoration, cabling projects, etc, where only the surface of the building fabric will be affected by the project
- A type II survey will attempt to inspect all normally accessible areas or where not accessed, the area is presumed to contain asbestos. Representative samples of suspect materials are collected, analysed and assessed
- Building services, such as pipework and ductwork are inspected where accessible

Type III (full access sampling and identification surveys 'pre demolition/major refurbishment'):

- These attempts to locate and describe, as far as reasonably practicable, all ACMs in an area. This investigation is likely to result in decorative damage to areas, and where relevant opening up of bulkheads and a full depth investigation of partition walls etc
- A Type III survey is required where demolition or penetration of building fabric or services is anticipated

ACMs in Plant and Equipment

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

Asbestos Register Content

The asbestos register records known and suspected ACMs within Aston University.

It contains information on their:

- Product type
- Location
- Extent
- Condition

The registers are aligned with the recommendations of MDHS100; information recorded allows objective risk assessments to be carried out.

The presumption must be made that ACMs are present in all areas not surveyed unless proven otherwise.

Availability

The asbestos register will be made readily available to all persons who may reasonably require such information (i.e. maintenance team, health and safety personnel, tradesmen, service engineers, technicians, etc). Other persons who frequently occupy areas of concern should also be made aware of ACMs within their work area to prevent future disturbance and exposure if there is likely to be a risk of disturbance created by their normal activity.

Please note that should the emergency services attend Aston University, they may wish to view a copy of each register before they proceed.

Updating the Registers

As a minimum, the register will be updated on an annual basis by a competent asbestos consultancy.

Non-actioned ACMs with a medium to high risk score that reside in readily accessible areas will require inspection every 3, 6 or 12 months as outlined within each asbestos survey under each individual item.

Individuals, departments or organisations who affect data in the register will supply relevant information to the Engineering Officer so the register can be updated accordingly.

Additional updates may be required following:

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

SECTION 5. RISK ASSESSMENT OF ACMs

All ACMs in the asbestos register provided have been objectively assessed by Bradley Environmental Consultants Ltd using a numerical scoring scheme.

Additionally a priority assessment score has been applied using guidance as described in the HSE document HSG 227 'A comprehensive guide to managing asbestos in premises'.

The material assessment considers features of the material analyses how likely the product is to release airborne fibre whereas 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

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

SECTION 6. MANAGEMENT OF ACMs

Recommendations form an integral part of the asbestos register and are considered the appropriate choice at the time of asbestos survey.

The final choice of asbestos management must be undertaken by the Engineering Officer based on information of future maintenance, refurbishment and demolition plans.

Long term ACM maintenance considerations including cost, resources, potential for exposure etc, should 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 future reference.

Leaving ACMs in Situ

Where ACMs are in good condition, with minimal potential for fibre release, they may be left in-situ. The Engineering Officer is responsible for ensuring these materials are kept in a sound condition via the services of a suitably licensed asbestos remediation contractor.

Planned works

Anyone who is planning, implementing, controlling or placing orders for any work or activity which may disturb the fabric of the building or the services which are contained within the building must ensure that the Asbestos Register has been checked before implementing or allowing any such activity or work to be carried out. Where ACMs are identified then a methodology must be implemented to ensure that there cannot be a release of asbestos particles caused by this activity. This methodology must be approved by a Licensed Asbestos Contractor or Asbestos Consultant or by the Supervising Officer in the Estates and Facilities Department. Any person involved in carrying out such an activity must be made aware of the presence of any ACMs, and that work can only be carried when that person has been made aware that the register has been checked and that it is safe to do.

Regular Inspection

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

Labelling

Labelling with standard asbestos warning labels or the fixing of appropriate warning signage will be carried out to all known accessible ACMs which are located outside of public view (i.e. ceiling voids, plant rooms, etc.).

Labelling of lower risk materials (i.e. floor tiles and bitumen sink pads) will not be carried out on the basis that control mechanisms (i.e. site awareness) are considered adequate in preventing accidental exposure.

However, where possible, products more likely to be disturbed by periodic maintenance should be labelled as a precautionary measure at the discretion of the Engineering Officer or in line with the University policy.

The absence of asbestos warning labels is not conclusive proof that the material/area is asbestos-free. If there is any doubt about the type of material in question the services of a specialist UKAS accredited analysis laboratory will be acquired. This service will be commissioned or arranged by the Engineering Officer.

Improvement Works

Where an 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 encapsulates. These encapsulates are typically polymeric applications which dry to give a robust water resistant surface. Repairs and/or alterations in the surface treatment (i.e. encapsulation) must be undertaken by a suitably licensed asbestos contractor, where applicable the local area may need to be isolated, either by constructing an enclosure or using localised exclusion techniques.

Removal of Asbestos Materials

The term 'removal' is used to describe both the removal of materials and the decontamination of areas where debris or other forms of asbestos contamination have 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 due to unplanned circumstances, for example:

- Damage to ACMs
- ACMs subject to maintenance or building works not foreseen during the AMP review

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. should be taken into account when arranging remedial works.

An independent UKAS accredited consultancy should be consulted and/or appointed to oversee all planned asbestos remediation works particularly on large works or where adjacent areas are likely to be occupied.

To allow accurate management of known ACMs throughout the site, the appointed asbestos removal contractor will ensure that the plan of work associated with the works at hand will clearly define which items are to be removed and from what survey they appear in. For continuity, this information must be reinforced within the Certificate of Reoccupation by the appointed UKAS accredited laboratory.

Planned remedial works must allow sufficient time for the following key stages:

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

Remedial Work Records

All records associated with a removal project are to be delivered to the Engineering Officer where they will be held for an appropriate period of time and must include as a minimum:

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

SECTION 7. EMERGENCY PROCEDURES

Emergency procedures

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 specialists such as UKAS accredited analytical consultancy and a licensed asbestos removal contractor.

The following emergency situations are considered:

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:

- Evacuate the local area and prevent others from entering the area by using signage, sealing up doorways or posting guards at an appropriate distance
- Do not disturb the material or stay longer in the affected area than is absolutely essential.
- Inform the **Estates Help Desk 0121 204 4433** or **Security out of hours 0121 359 2922**.
- Security or the Help Desk should contact a Senior Member of the Estates Management team who can contact a specialist by calling

Cullen Thermals - 07887764509

Bradley Environmental

- 1. Chaz Reeves 07740 088 901**
- 2. Matthew Turner 07764 862 351**
- 3. Stuart Hill 07976 645 136**

In the event that a manager cannot be contacted then security should report the incident to the above and follow any advice given

- Seal off the area, isolate ventilation systems, close windows, doors etc so long as this is possible without causing further disturbance to the material and without staying in the area any longer than necessary.
or
Arrange for others to do this if possible, ensuring that they are advised to avoid any exposure.

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- Wait for instructions from a specialist who will have been contacted following your call to the Help Desk or Security.
Avoid further contamination by remaining in one place, preferably outside in the fresh air or in an area that has not been contaminated by the incident. Be aware that your clothes may be contaminated and that this contamination can be passed onto others or other areas and vehicles
Make a note of any other areas in which you may have created a secondary contamination.

Non-specialist personnel required to enter areas of elevated airborne asbestos fibre, for example:

- Plumbers or electricians who are required to carry out services isolations
- Experts who are required to give first aid or similar

Access can only be given under the control of a licensed and qualified contractor or Environmental Analyst.

Reports and Records

A record is to be kept of known asbestos exposures. "Exposure" will generally be taken to mean exposure to a known or possible level that exceeds 0.01 fibres per ml of air, this is the level termed the 'clearance indicator'/'detection limit' in the Control of Asbestos Regulations (CAR) 2006. These results can be obtained by conducting reassurance air monitoring within the area of disturbance immediately after the event.

The form should 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 (determined by air monitoring during and/or after the event)
- Copies of any associated analytical records
- Details of advice etc given to individual (health risks of asbestos etc.)

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) apply to asbestos related exposures. The University Safety Office should be informed immediately of any situations which give rise to an uncontrolled release of asbestos fibres.

The Safety Office should maintain these records. A copy should be given to the employee with the recommendation that it be kept indefinitely.

The HR Office should be made aware so that personal records can be updated and maintained

Where the exposure relates to non Aston University employees the Engineering Officer should record known details and these should be passed onto the Safety Office.

Where a contractor or sub contractor is affected then that person's employer should be made aware and provided with the same details as those given to the Safety Office.

Whilst there is no requirement for medical surveillance the Engineering Officer can provide details of available information outlining any actions that the affected individual may wish to take

SECTION 8. INFORMATION & TRAINING

Information on the AMP and the management of ACMs including each asbestos register should be available to all relevant personnel and organisations.

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

Training

The Engineering Officer will ensure that a suitable level of expertise is available at Aston University, 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 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 to be covered by in-house training sessions are:

- AMP purpose, general arrangements, availability and location responsibilities of employees and key groups
- The asbestos register and its location, use and availability
- ACMs at Aston University; their range and distribution
- 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 prior to being permitted to operate on site.

In summary:

- Asbestos awareness training will be arranged for relevant employees by Aston University where applicable.
- The responsibility for obtaining asbestos awareness training for external contractors will remain with the external contractors company and is not the responsibility of the University.
- Persons who are required to work on site and are not in possession of a suitable level of asbestos awareness training are permitted to continue to work on site providing they are supervised by someone who is in possession of asbestos awareness training.
- Alternatively, persons may proceed without the above providing the supervising officer is satisfied that the works at hand will not result in an uncontrolled release of asbestos.

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- 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.

SECTION 9. ACTION PLAN

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The Action Plan will contain priorities and timetables or targets for both remedial works (i.e. 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 Engineering Officer will review the action plan on a regular basis and make adjustments where necessary.