

### Okehampton Town Council

# ASBESTOS MANAGEMENT PLAN

#### In partnership with:



Environmental Services 48 Shillingford Road Exeter EX2 8UB

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#### **Overview**

#### CAR 2012 Regulation 4

This asbestos management plan has been prepared by Environmental Services, Exeter in conjunction with Town Clerk, Emma James, the RP (Responsible Person for asbestos) at Okehampton Town Council, in order to discharge the responsibilities placed upon them by Regulation 4 "Duty to manage asbestos in non-domestic premises" of CAR (Control of Asbestos Regulations) 2012.

The purpose of the management plan is to ensure that staff, contractors and visitors to Okehampton Town Council's properties are, as far as is reasonably practicable, not exposed to airborne asbestos fibre resulting from the disturbance of, accidental or otherwise, ACMs (asbestos containing materials,) or from ACMs in poor condition.

The management plan sets out the framework for compliance with Regulation 4 of CAR 2012 by addressing the discovery, identification, monitoring and reviewing of ACMs. In addition, this management plan also identifies the duties of the RP as well as the responsibilities, and procedures to be adopted by staff and contractors working within Okehampton Town Council's properties.

### The Dutyholder or RP (Responsible Person) for asbestos CAR 2012 Regulation 4 (1)

The responsibility for the necessary arrangements relating to the implementation of the management plan rests with the RP for asbestos:

Emma James
Town Clerk
Okehampton Town Council
Town Hall, Fore Street
Okehampton EX20 1AA
01837 53179
townclerk@okehampton.gov.uk

Additional duties held by the RP include the arranging of:

- Twelve monthly reviews of the management plan, recording the findings and implementing any remedial action deemed necessary.
- Periodic inspections of all presumed and identified ACMs, recording the findings and implementing any remedial action deemed necessary.
- Investigations when an ACM is reported, or discovered, to have been damaged, recording the findings and implementing any remedial action deemed necessary.
- HSG 264 refurbishment/demolition asbestos surveys, prior to any structural alterations or disturbance of building fabric.

- Control of contractors with respect to the potential impact ACMs may have on planned and reactive work undertaken on behalf of the council.
- Staff training, where deemed appropriate.
- The provision of information, relating to ACMs, to the emergency services when required.
- HSE licensed asbestos removal contractors and subsequent four stage clearance air testing (by a UKAS accredited laboratory), when required.

Environmental Services, Exeter have been appointed as an independent, external consultant to assist the RP, where necessary, in the discharging of their duties. The point of contact and person with detailed knowledge of Okehampton Town Council's properties is:

Nicholas Mayne

Assistant Quality & Technical Manager

Environmental Services, Exeter

01392 438251 / 07890 450 756

nmayne@environmentuk.com

#### The strategy for ACMs and suspected ACMs

CAR 2012 Regulation 4 (6), (7) & (8)

It is the policy of Okehampton Town Council to leave in situ all presumed and identified ACMs that are detailed in their properties' asbestos registers, provided they are in good condition and unlikely to be disturbed. This approach will be adopted until:

- The RP is informed that an ACM has been accidentally damaged or is found as a result of periodic inspection.
- An ACM requires removal because of its unavoidable disturbance by proposed refurbishment/remodelling works.

If an ACM is found, or reported, to have been damaged, then the RP will assess the most appropriate course of action. The options available are either:

- Encapsulation or re-encapsulation of the ACM, with the frequency of periodic monitoring reviewed. Signage of the ACM may be considered, if not already in place.
- Protection or enclosure of the ACM, with the frequency of periodic monitoring reviewed. Signage of the ACM may be considered, if not already in place.
- Partial or complete removal of the ACM, which in certain circumstances involve the employment of a licensed asbestos removal contractor.

In any event, the RP will ensure that the decision-making process, remedial action taken and any resulting improvements are recorded, and the asbestos register amended accordingly (i.e. to reflect ACM enclosure, removal etc).

With regards to the signage referred to above, ACMs may, be signed with an asbestos warning label and/or a permit to work label, as illustrated below. The permit to work label may be used in conjunction with, or separate from the warning label, to highlight that a particular area or product may only be worked upon/within, after consultation with the RP. These two labels are not regarded as the method by which persons are prevented from disturbing ACMs. It is at the discretion of the RP to decide if none, one, or both of these labels is appropriate with respect to any given ACM or area containing ACMs.





#### Asbestos survey, registers and risk assessments

CAR 2012 Regulation 4 (3), (4), (5), (6), (7) & (8)

The requirement for a suitable and sufficient assessment as to whether ACMs are present within Okehampton Town Council properties lead to the commissioning of HSG 264 management asbestos surveys by the RP. This has resulted in the production of asbestos registers detailing the presence, type, extent and condition of ACMs used throughout the buildings. The preferred method is for positive identification through analysis by Environmental Services' UKAS accredited laboratory based in Exeter (testing laboratory number 2099). Where sampling has not taken place, for reasons of inaccessibility or avoiding causing damage, a presumption of asbestos will be made where considered appropriate. The asbestos register further records the overall risk rating of each occurrence based upon the combined scores of the material risk assessment (carried out during the survey by Environmental Services using the algorithm contained in appendix 4 of HSG 264) and the priority risk assessment (carried out with the assistance of the RP using the algorithm in appendix 3, table 3 of HSG 227).

The RP shall ensure that the periodic inspection of ACMs and subsequent updating of the asbestos registers is completed. This also applies to any other changes, such as following the removal or discovery of an ACM. The results of these inspections, changes, discoveries and action taken shall all be recorded.

Master copies of the asbestos registers are held by the RP at Okehampton Town Council and by Environmental Services.

### Routine/planned maintenance works & contractors' responsibilities CAR 2012 Regulation 4 (9) (c) (i) & CAR 2012 regulation 4 (2)

The RP has control of all contractors employed to work on Okehampton Town Council properties and the responsibility to ensure that they are aware of the risks associated with ACMs, together with the findings and limitations of the asbestos survey, register and management plan. Prior to the commencement of any maintenance work on an Okehampton Town Council property, the relevant building asbestos register will be consulted by the RP at the earliest opportunity in order to assess how the proposed work may potentially disturb ACMs either directly or indirectly.

If the fabric of a building is due to be disturbed, the RP will ensure that an HSG 264 refurbishment/demolition survey is undertaken of the affected area(s), as far in advance of the work commencing as is reasonably practicable. How best to deal with any identified ACMs can then be assessed by all relevant parties (the RP, the contractor, the architect, the CDM co-ordinator, Environmental Services).

At the planning stage, it will be decided if:

- The work may proceed unhindered.
- The work may proceed with care as ACMs are not directly affected by the work but are present within the working area.
- The work may only proceed after presumed ACMs are sampled to confirm they are asbestos free or, if subsequently identified as

- asbestos, after arrangements are made for the material to be left undisturbed and in situ, or removed.
- The work may only proceed after identified ACMs, that will unavoidably be disturbed by the work, are removed in accordance with CAR 2012.

The RP will ensure that all contractors sign a register to confirm they have read and understood the asbestos register for the building they intend to work in, prior to the commencement of works. Contractors must be made aware, that if the scope of their work alters, the RP and register must be consulted further, before proceeding.

The asbestos register should be consulted as far in advance of the work commencing as is reasonably practicable.

The RP will ensure that a written record is kept of their joint consultation of the asbestos register with all contractors undertaking work at Okehampton Town Council properties. Such details will be recorded using the appropriate form (see appendix 2).

Environmental Services will ensure that the asbestos register is updated on completion of any additional material sampling carried out and/or asbestos removal undertaken.

### Reactive/emergency maintenance works & contractors' responsibilities

CAR 2012 Regulation 4 (9) (c) (i) & CAR 2012 Regulation 4 (2)

The RP has control of all contractors employed to work on Okehampton Town Council properties and the responsibility to ensure that they are aware of the risks associated with ACMs, together with the findings and limitations of the asbestos survey, register and management plan. Prior to the commencement of any reactive/emergency maintenance work on an Okehampton Town Council property, the relevant building asbestos register will be consulted by the RP and the attending contractor, to assess how the proposed work may potentially disturb ACMs either directly or indirectly. At this stage, it will be decided if:

- The work may proceed unhindered.
- The work may proceed with care as ACMs are not directly affected by the work but are present within the working area.
- The work may only proceed after presumed ACMs are sampled to confirm they are asbestos free or, if subsequently identified as asbestos, after arrangements are made for the material to be left undisturbed and in situ or removed.
- The work may only proceed after identified ACMs that will unavoidably be disturbed by the work are removed in accordance with CAR 2012.

Environmental Services will be on hand to make an immediate visit should material sampling or advice be required. If the fabric of a building is due to be disturbed, the RP will ensure that Environmental Services undertake an HSG 264 refurbishment/demolition survey of the affected area(s), as soon as is reasonably practicable.

The RP will ensure that all contractors sign a register to confirm they have read and understood the asbestos register for the building they intend to work in, prior to the commencement of works. Contractors must be made aware that if the scope of their work alters, the RP and register must be consulted further, before proceeding.

The RP will ensure that a written record is kept of their joint consultation of the asbestos register with all contractors undertaking work at Okehampton Town Council properties. Such details will be recorded using the appropriate form (see appendix 2).

Environmental Services will ensure that the asbestos register is updated on completion of any additional material sampling carried out and/or asbestos removal undertaken.

## Remodelling works, structural alterations and all other activities involving the disturbance of the building fabric

CAR 2012 Regulation 4 (3), (4), (5) & (8)

Prior to the commencement of any work that may disturb the fabric of an Okehampton Town Council building, the RP will ensure that the existing management asbestos survey is upgraded to an invasive refurbishment/demolition survey of the areas affected by the work, as early as is reasonably practical.

Where necessary, the RP will ensure that any identified ACMs, likely to be disturbed, are removed in accordance with CAR 2012 prior to the commencement of any refurbishment work. The employment of contractors who undertake asbestos removal within Okehampton Town Council's properties (licensed, non-licensed and notifiable non-licensed work), will be separated from any main building contract (for reasons of competitiveness) and be overseen by Environmental Services, to ensure regulatory compliance.

Environmental Services will ensure that the asbestos register is updated to reflect the findings of all refurbishment/demolition surveys carried out, including any subsequent work on ACMs (enclosing, removal etc).

### Making information available to staff, including staff training CAR 2012 Regulation 4 (2) & (9) (c) (i)

The RP will ensure that all staff of Okehampton Town Council, who are likely to come into contact with, or be affected by, ACMs within their area/place of work, are provided with adequate information, instruction and training as deemed necessary.

Key personnel will undertake asbestos awareness training, including the RP, who's responsibility it is to organise such training. Some of the topics included within the training will be the use of asbestos registers, the types of ACMs within Okehampton Town Council properties, what to do in the event of an ACM discovered/reported to be damaged, and the purpose and contents of the asbestos management plan.

The RP will reinforce Okehampton Town Council's position that no employee will undertake any work on ACMs.

Details of the provision of information, instruction and training to staff will be kept with the asbestos management plan (in appendix 5).

#### Making information available to the emergency services

CAR 2012 Regulation 4 (9) (c) (ii)

The RP will ensure that in the event of the emergency services being called to an Okehampton Town Council property, they have immediate access to all information relating to ACMs.

### Reporting of damaged ACMs or materials suspected to contain asbestos

CAR 2012 Regulation 4 (2), (6), (7), (9) (b) & (10) (a)

If an ACM, or a material suspected of being an ACM is damaged or observed to have been damaged, then the area shall be vacated immediately, sealed, signed and the incident reported to the RP who, in conjunction with Environmental Services, shall undertake any necessary investigation and remediation (see page six for options). A subsequent investigation into the circumstances leading to the damage shall be carried out by the RP in order to establish the root cause of the incident and amend procedures to reduce the likelihood of a reoccurrence.

Using the appropriate form (see appendix 1), the RP will ensure that a written record of all such investigations is kept so that they may be referred to during the next review of the management plan.

### Reviewing and recording of the risk assessment of each ACM and suspected ACM

CAR 2012 Regulation 4 (6) & (7)

The RP will arrange for Environmental Services, Exeter to review periodically, all ACMs and suspected ACMs to ensure they remain in good condition and that if damage is discovered, the appropriate course of action is considered and taken (see page six for options).

Using the appropriate form (see appendix 3), a written record of all reviews, their findings and conclusions will be kept by the RP and provided by Environmental Services.

#### Monitoring and reviewing of the management plan

**CAR 2012 Regulation 4 (10)** 

This management plan will be subjected to a twelve-monthly review by the RP, and if necessary Environmental Services, in conjunction with the periodic reinspection of ACM's. It will require the input of and information gathered by, the RP to assess the effectiveness of the plan and whether any alterations are required as a result of changes in staff/contractors, or the accidental damage of an ACM.

The RP will use the appropriate form (see appendix 4) and keep a written record of all reviews, their findings and conclusions.