

## 1. Introduction

This document provides guidance and describes the Council's general risk-based approach to the management of asbestos containing materials (ACMs) in Fife Council premises. This includes the non-domestic areas of Fife Council Housing Stock.

This document should be read in conjunction with (and shall be considered as an extension to) Fife Council Policy "Management of Asbestos in all Council properties".

## 2. Priorities

The general approach takes account of the likely behaviours and general activities taking place in our properties, and the resulting likelihood of damage to the building fabric. This determines initial prioritising of a program of surveys which identify, record, and inform consequent monitoring of ACMs in our buildings. This results in the following descending order of priority:

1. Secondary Schools, including higher risk areas such as Special Schools and Off-Campus Units. Common parts (e.g. stairwells, lifts, attic spaces, service ducts, laundries and stores) of our Council Housing stock.
2. Primary Schools and Nurseries, and a proportionate survey of dwelling areas and lock-up garages in our Council Housing stock.
3. Sports Halls, Swimming Pools and other leisure, activity and education facilities, with particular focus on those premises accessible to the public.
4. Libraries
5. Social Work premises, Local offices and other discrete premises with significant public access (including Car Parks and Bus Stations, Pavilions and other cafeteria, drink and /or food sales premises).
6. Council Depots, Workshops, Stores, Warehousing, archive rooms, discrete plant rooms(including IT/telephony/power transformer & switch gear/battery storage rooms not covered above).
7. Other Council Office premises, prioritised in terms of population
8. All other premises and structures, including public toilets, bus shelters, and other minor structures such as might be found in (e.g.) public parks (shelters, boating sheds, lean-tos and other structures).

We recognise that we have a varying degree of control (which will usually be established by contract or lease terms) over a significant number of premises which are leased out to private businesses and voluntary organisations.

Buildings constructed after 1999 will be assumed 'asbestos free'. Whilst acknowledging that older buildings (c.1900 and before) used no asbestos in their initial construction, we recognise that most of these premises will have been subject to extensive alteration, refurbishment and modernisation, particularly in the post 1960 period. For this reason, the age of premises will not be used as a sole prioritising factor.

### 3. Surveys and Gathering Information

Information about the condition, extent and accessibility of ACMs shall be gathered in accordance with the above priority programme, generally by way of Management Surveys by competent & accredited surveyors and analytical laboratories, all in accordance with authoritative Health & Safety Executive publications. This Survey Information shall be gathered and transferred into either

- (a) Housing Management Asbestos System (for Housing premises), or
- (b) the Asbestos Module of Fife Council's Asset Management and Information System (AMIS) (for all other Fife Council premises)

to form the basis for our Property Asbestos Risk Registers.

Where works, maintenance or repairs are scheduled and the premises have yet to be surveyed, then a presumptive approach will be rigorously applied, i.e. materials shall be presumed to contain asbestos unless there is strong evidence\* to the contrary.

Sufficient sampling and analysis of discrete areas of the premises will be taken and analysed in order to establish safe systems of work for such discrete tasks.

In the absence of authoritative records for premises, a presumptive approach will be strictly adhered to, i.e. materials and building fabric will be presumed to contain asbestos unless there is strong evidence\* to the contrary. Older records, drawings and building notes are not to be taken as authoritative in this regard.

*\* "strong evidence" includes a previous documented negative analysis result (but beware of the limited information on larger ceilings or textured coatings – one sample result is not enough. Be aware also of the extent and limitations of Management Surveys; these will not include results for 'hidden' areas.*

*"Strong evidence" includes obvious situations where the material is brick, concrete, plaster, wood, vitreous enamel, pvc, etc.*

A flexible approach to Survey Type, along with ad-hoc sampling and analysis, may be applied in the successful management of ACMs and establishing safe systems of work. For example, Management Surveys can be undertaken, but sample analysis may be deferred until work is to be undertaken, a presumptive approach being applied in the interim.

Refurbishment and Demolition Surveys are recognised as being intrusive and destructive to some degree and such surveys will usually be limited to demolition projects or where significant refurbishment or modernisation works are to be undertaken.

## 4. Scoring & Risk Ranking

Material and Priority Assessment scores as described in HSE publication HSG264 shall be used.

These scores shall be added to give an overall "Risk Assessment" Score for each incidence of ACM found or presumed.

Risk Assessment Scores shall be ranked as follows:

<b>High Risk</b>	<b>19 - 24</b>
<b>Medium Risk</b>	<b>13 - 18</b>
<b>Low Risk</b>	<b>9 - 12</b>
<b>Very Low Risk</b>	<b>8 or less</b>

## 5. Controlling & Managing the Risk

The Method of controlling these risks will conform to the following principles:

**The general aim, by taking appropriate remedial action, is wherever practicable to achieve a Risk Assessment score in the 'Low' or 'Very Low' category for all ACMs.**

### High Risk

The material shall be stabilised and repaired or replaced at any discrete areas of gross damage. Wherever possible, the ACM will be encapsulated to ensure an efficient and long-lasting protection, appropriate to the expected and foreseeable level of likely disturbance. Asbestos Risk Registers shall be updated to reflect improvements made, and material and priority scores recalculated as required. The remedial actions taken should result in a 'Medium Risk' score or better.

**Only as last resort will ACMs be removed.** The relative risks involved in any asbestos removal operation are recognised and will wherever possible be avoided.

## **Medium Risk**

The most complex and demanding score area for effective risk management. Where Risk Assessment Scores fall into this category, it is likely that a number of discrete factors from both the Material and Priority Assessment will need to be considered in order to determine the most relevant and effective course of action, and to determine the most appropriate inspection frequency. Some typical examples of an approach to “medium score” ACMs are discussed at Appendix 1.

## **Low & Very Low risk**

These scores indicate that the ACM poses no significant threat to building users. These risks can and will be adequately controlled by application of a rigorously observed routine visual examination at established frequencies by nominated competent persons. Record of these inspections shall be maintained.

This inspection process will itself be regularly and routinely audited for compliance.

### **Recommended Inspection periods:**

**Medium Risk (score 13-18) = every 6 months**

**Low (score 9 -12) & Very Low Risk (score 8 or less) = every 12 months**

## **Maintenance Activities**

It is recognised that routine maintenance activity and works programs can and will have a consequential effect on information contained in Asbestos Risk Registers. The extent of ACM may change, e.g. the partial removal of an area of ceiling tiles, the asbestos may have been removed entirely (e.g. boiler replacement) or the degree of encapsulation may have been upgraded. In some instances asbestos flooring materials may have been overlaid with new flooring. It is important that our records are maintained to warn others of such ‘hidden’ hazards.

## **Emergency Work**

Emergency call-out work is not an excuse for lower standards. In-house and external contractors involved in emergency work shall be vetted to ensure they are suitably equipped and trained to recognise and work with ACMs where this proves necessary. Emergency Works Contractors shall be included in our arrangements for the communication of ACM information discussed below.

All reasonable steps shall be taken to anticipate the areas and situations in our premises where ACMs are likely to be disturbed during a maintenance emergency, and appropriate steps taken to relocate the affected services or replace sections or panels of ACMs, as appropriate.

## **Communicating Information & a continuous approach to risk management**

Prompt access to relevant information on ACMs is extremely important to those likely to disturb or work on or near them. Employees and their representatives also have a right to access this information in comprehensible form.

To achieve this aim, Asbestos Risk Registers shall be maintained and made readily available at each of our workplaces. Appropriate information about asbestos risks will also be delivered to each householder within our Council Housing stock, also being made available to new tenants at change of tenancy.

At the earliest opportunity, Fire & Rescue Service shall be given 'read only' access to all our Asbestos Risk Registers.

## **Related Documents and references**

Fife Council Asbestos Policy and related documents are available via the [Intranet Asbestos page](#).

## **Health & Safety Executive Publications**

Referenced HSE publications are available at:

<http://www.hse.gov.uk/asbestos/information.htm>

## 6. Appendix 1

A discussion of a possible management approach to ACMs with an overall “medium” (range 13 -18) Risk Assessment score.

### Example 1

A quantity of asbestos pipe lagging exists in an under-floor duct in a Primary School.

**The Material Assessment Score** supplied by the Surveyor is 10 (out of a possible maximum 12) (Thermal Insulation =3 + Low damage =1+ unsealed lagging =3 + crocidolite =3, total 10).

**The Priority Assessment Score** is assessed as a total score of 4 (out of a possible maximum 12) (rare disturbance=0 + >50m pipe run in an corridor up to 100m<sup>2</sup> average score =2 + no human exposure potential in normal use of the building =0 + type & frequency of maintenance =2, total 4).

**Risk Assessment Score** =14 medium risk

### Discussion

There is no real risk in this instance to those normally occupying or using the building. There is no value (indeed, there is actually some risk involved) in conducting any periodic inspection – the asbestos is not going to suffer any damage or deterioration. The real risk here is to any maintenance, installation or construction personnel, and in these situations it would be wise to prominently mark or label the duct hatches with asbestos warning information labels (along with information in the Asbestos Risk Register). A more detailed assessment of the services and controls within these ducts and the likelihood of failure or requirement for emergency access will inform the need for any further action, e.g. it might be prudent to render any shut-off valves within these ducts redundant by installing new controls at an up-stream location (and marking-up Service Drawings accordingly).

## (Appendix 1 continued)

### Example 2

A number of Fire-break doors in a school corridor are protected by Asbestos Insulation Board panels.

**The Material Assessment Score** supplied by the Surveyor is 7 (out of a possible maximum 12) (AIB =2 + medium damage =2+ encapsulated AIB = 1 + amphibole asbestos =2, total 7).

**The Priority Assessment Score** is assessed as a total score of 9 (out of a possible maximum 12) (high disturbance= 3 + routinely disturbance of an area <10m<sup>2</sup> in a room up to 100m<sup>2</sup>, average score =2 + >10 occupants, daily use, >6 hours per day = 3 + type & frequency of maintenance (average) =1, total 9).

**Risk Assessment Score** =16 medium risk

### Discussion

Here the score is 'tipped' into the 'medium' category due to the door panels suffering moderate damage to encapsulation (painted surface). It is suggested that the encapsulation needs to be improved. It may be that the door panels can be over-clad with plywood or other wearing material. It should be recognised too that the likely behaviour of (a minority) of young people may result in occasional malicious damage, and the encapsulation should be capable of resisting this type of abuse.

This fairly simple remedial work will bring the Risk Assessment score down to a total of 13 (the very low end of medium risk) by reducing the 'damage/deterioration' score from 2 to 0, and the average score for 'likelihood of disturbance' down from 2 to 1. A regular inspection regime (recorded quarterly) to monitor any damage to the encapsulating material is considered an adequate management strategy. In any School, it is unlikely in any event that such damage would go unnoticed for more than one day). The Asbestos Risk Register (along with Material, Priority Risk Assessment Scores) should be amended to record the encapsulation of the ACM. It is particularly important to provide adequate information for maintenance personnel where the ACM has been encapsulated and is no longer visible or obvious.

Replacement of doors containing asbestos poses a low risk of exposure if the doors are in good condition, are not damaged during removal and the appropriate controls are used to reduce exposure. Any major refurbishment Project *could* consider the removal of such doors and replacement with non-asbestos type. This would prevent future inadvertent exposure due to damage or unauthorised work. The management requirements to monitor the condition of the doors would then no longer apply.