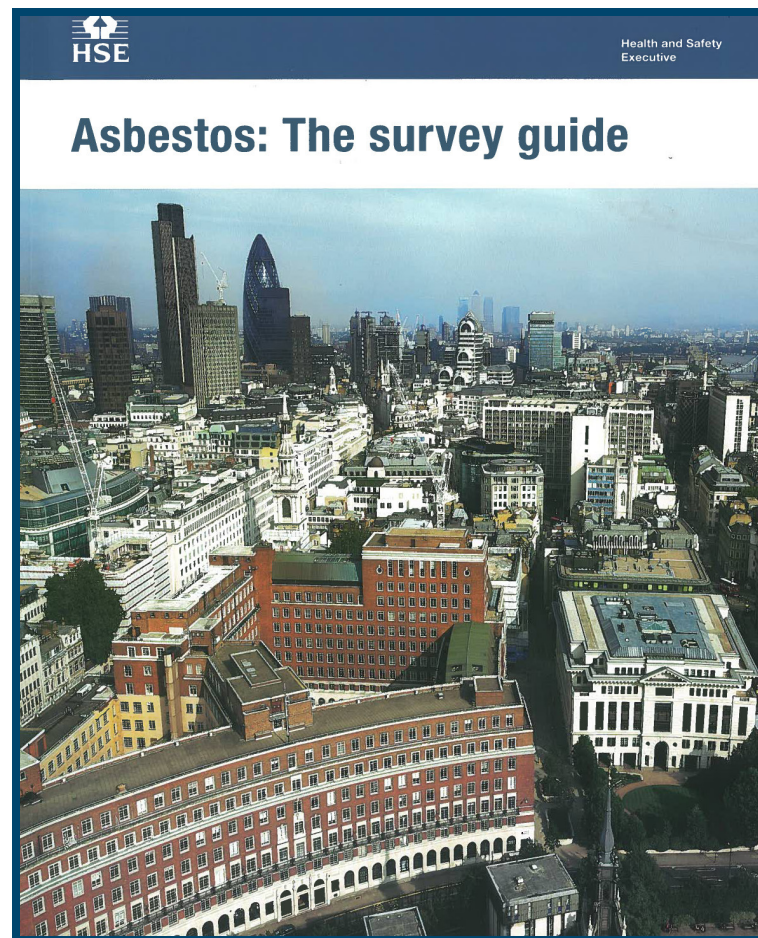




## HSG 264



- Published 29<sup>th</sup> January 2010 to replace former HSE guidance document MDHS 100, *Surveying, sampling and assessment of asbestos-containing materials*;
- The guidance is aimed at, Surveyors and Those who commission surveys (clients/duty holders).

# Surveys: The Present

*Bradley*  
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- Excellent practice in many cases.
- But there are issues to be addressed from the;
  - Client;
  - Surveyor;
  - Architect.



Client

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- Un-informed, does not know what is required;
- Does not want to spend money, goes for the cheapest option;
- Unwilling to be inconvenienced during the survey;
- Does not know what the surveyor needs;
- Does not understand their duties and obligations;
- Does not know how to check the survey report is adequate and fit for purpose.





Surveyor

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- Competence/lazy/rushed:
  - Missed ACMs/accuracy of survey;
  - Not looking in the right places;
  - Report excludes areas not surveyed.
- Lack of experience;
- Lack of knowledge on building construction;
- Insufficient training.



Architects

*Bradley*  
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- Poor knowledge of use of ACMs in buildings;
- Little knowledge of asbestos surveys and their purpose and use;
- Has no understanding of Dutyholder's responsibilities.

The background of the slide features a close-up photograph of green grass blades with several water droplets resting on them. The lighting is soft, creating a natural and fresh aesthetic.

## Other Issues

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- Caveats/Exclusions;
  - Roof voids, cellars, locked doors, can't work above 2m;
  - Areas "presumed".
- HSE reported seeing one survey with 16 separate exclusions;
- Insurers insisting caveats included;
- Surveyors need correct equipment for access etc.

# Aims and Objectives of the New Guidance for Surveyors

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- It sets out how to survey premises for ACMs;
- More aware of client's needs (better informed);
- Specifies methodology in carrying out surveys (better quality surveys);
- How to report results (better reports);
- Builds on and updates MDHS100;
- Uses Blue summary boxes throughout the document giving guidance to surveyors.



# Aims and Objectives of the New Guidance for Client

*Bradley*  
ENVIRONMENTAL

- How to decide what type of survey is appropriate (better informed);
- How to select a competent surveyor and what to expect from the surveyor;
- What the client needs to provide to the surveyor, better understanding of surveyor needs;
- Better management of asbestos;
- Uses Green summary boxes throughout the document giving specific guidance to clients and dutyholders.

# Competence and Quality

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- The document strongly recommends using accredited surveyors or organisations;
- The client/dutyholder must ensure adequate time and resources are made available to surveyor;
- Check your surveyor has knowledge, competence and experience relevant to the survey project being asked of them.

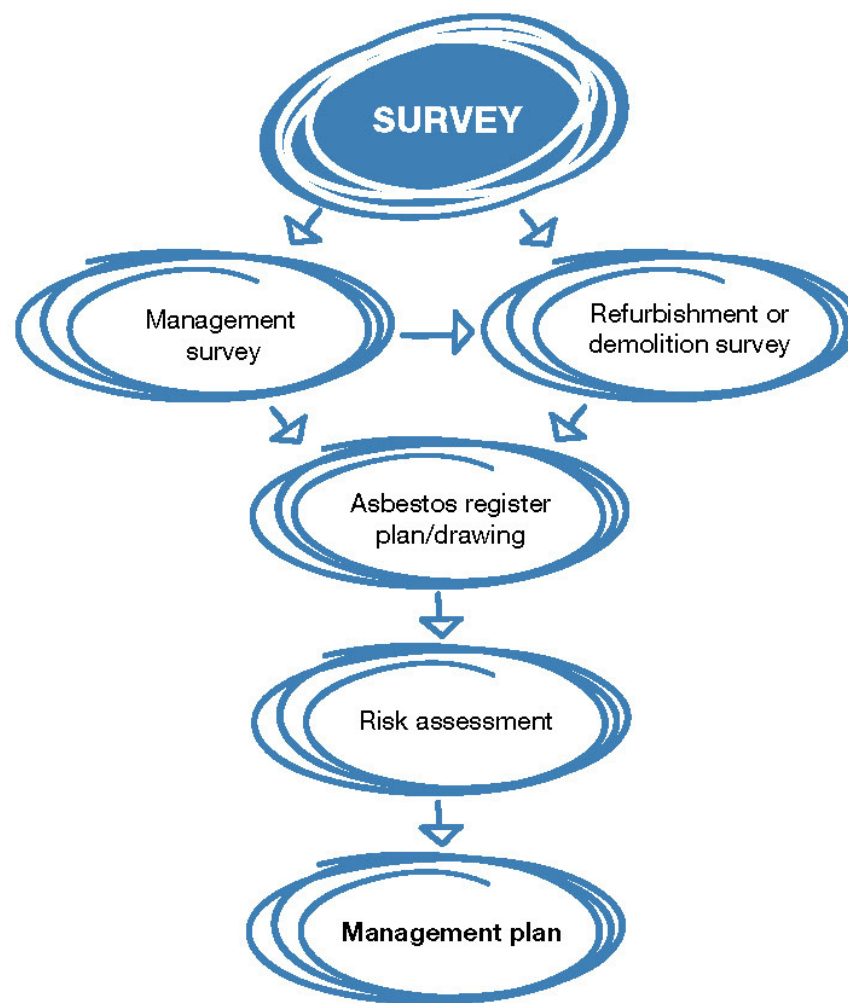
## Purpose of Survey?

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- To assist in management of asbestos in your building (Regulation 4 of CAR 2006);
- To assist in the preparation of an asbestos register;
- To assist in determining which ACMs require action to maintain a safe and healthy environment;
- To identify ACMs that need to be removed prior to refurbishment works or demolition.

# What Type of Survey?

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# What Type of Survey?

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- The Survey Guide has replaced the types I,II and III surveys from MDHS 100 with;
  - **Management surveys**, required during normal occupation and use of a building to enable management of ACMs in situ.
  - **Refurbishment and demolition surveys**, required when any refurbishment or demolition works are planned on the building or part of the building.

# Management Surveys

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- Survey all accessible areas as far as possible:
  - Surfaces: Walls, ceilings, pipes, boilers, cladding, floor tiles.
  - Lift shafts, inside risers, service ducts, above false ceilings, tunnels.
  - Client will need to arrange engineers to access lift shafts and any similar areas.

**Any areas not inspected must be presumed to contain asbestos.**

# Refurbishment/Demolition Surveys

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- Purpose is to identify what to remove before planned works;
- Used to locate ALL ACMs in ALL areas afarp.
  - Structural locations;
  - Break through walls, ceilings, cladding partitions
  - Inside cavities, ducts, tunnels, under flooring.

**Such surveys will involve damage as they involve destructive/aggressive inspection methods. So clients be aware of this and if area is to be occupied after survey, making good will need to be organised, either by your self or the surveyor.**

## Survey Key Points

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- Inspect a pre-agreed area with the client;
- To a pre-agreed degree of "thoroughness" choosing the correct survey type;
- Be clear for the reason of the survey;
- Identify actual and potential ACMs;
- All asbestos should be located as far as reasonably practicable within the survey type;



## Survey Key Points

*Bradley*  
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- For refurbishment/demolition surveys the survey area has to be unoccupied;
- If area to be reoccupied after survey then area needs to be fit for re-occupation;
- Avoid caveats; any used must be agreed and documented with the client;
- Remember the survey report should be user friendly for it to be of any use.



## Survey planning

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- The survey is not about just turning up and taking samples;
- There needs to be a sufficient exchange of information between the client and the surveyor;
- Clear understanding from both parties about what is required;
- This information will form the contract.

# Information Required by the Surveyor from the Client

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- Details of buildings or part of building to be surveyed, including plans;
- Type of survey or surveys required;
- Details of use of buildings, processes in use and hazards present;
- Access arrangements and contact details;
- Health, safety and security information;
- Any areas of difficult access.

# Information the Client Should Expect from the Surveyor

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- Accreditation details of surveyor/company, qualifications and quality control procedures;
- Insurance cover held;
- Costs;
- Proposed scope of works;
- Agreed details of caveats;
- References from similar contracts;
- Timetable, plan of work and report format.



# Information Required for a Management Survey

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- Asbestos product type(s);
- Location of the ACMs;
- Extent or quantity of the ACMs;
- Asbestos type(s);
- Accessibility/ vulnerability of the ACMs;
- Amount of damage/deterioration to ACMs;
- Surface treatment (if any).

# Information Required for a Refurb/Demo Survey

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- Asbestos product type(s);
- Location of the ACMs;
- Extent or quantity of the ACMs;
- Asbestos type(s).

If the refurb/demo work is not planned for at least three months after completing the survey then include the information included for a management survey.



## The Report

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Is a record of the information collected at a particular time on the presence and condition of ACMs.

Which is used to prepare an asbestos register and management policy.

Should be completed in a written format, supplied either as a hard copy or as an electronic document or both.



# The Report

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- Should contain;
  - Executive summary;
  - Introduction, including scope of survey;
  - General site and survey information;
  - Survey results (inc material assessment results);
  - Site plan and photos;
  - Conclusions and actions;
  - Bulk analysis results.



# General Site and Survey Information

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- Name and address of organisation carrying out the survey;
- Name(s) of the surveyor(s);
- Name and address of the client;
- Name and address of the premises surveyed;
- Date that the report was compiled on;
- Date that the survey was conducted;
- Purpose, aims and objectives of the survey;
- Description of the areas surveyed;
- Description of any areas excluded from the survey and reasons;
- Survey methodology used;
- Type(s) of survey undertaken – as agreed with client;
- Any deviations from the method;
- Agreed exclusions and inaccessible areas.



What is the purpose of HSG264?



## **Regulation 4**

*The duty to manage asbestos  
in non-domestic premises*

## Regulation 4

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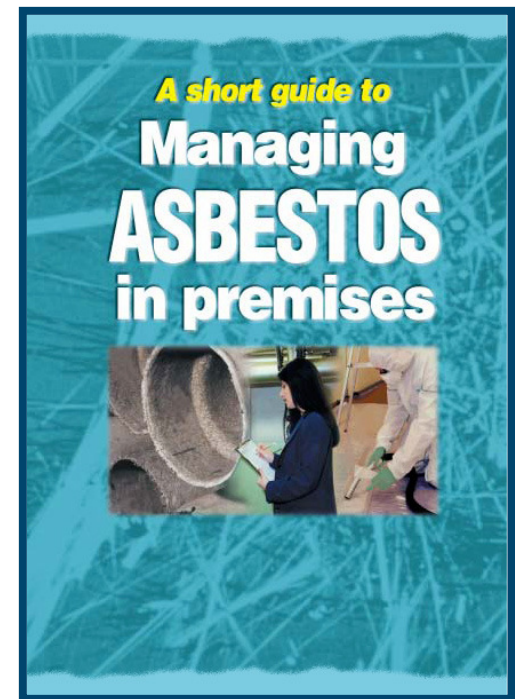
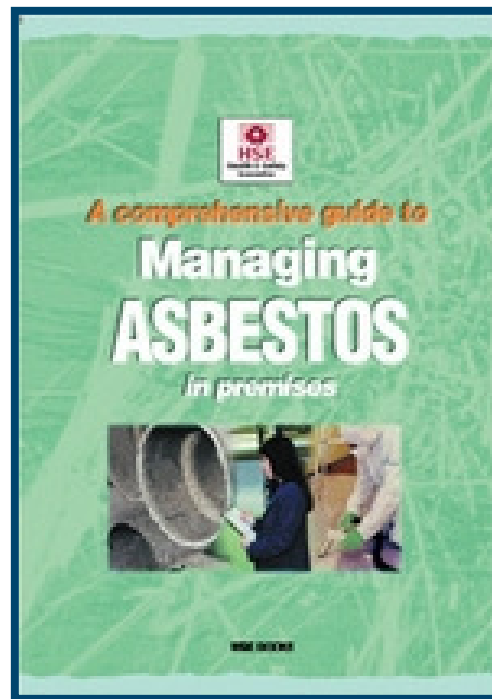
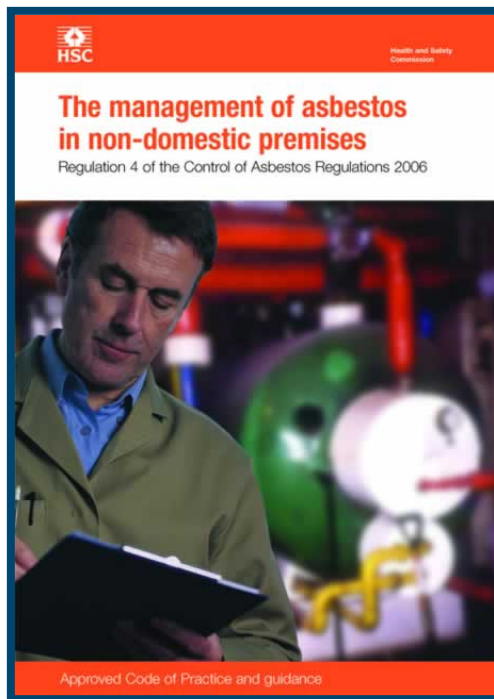
Dutyholders have had a specific legal obligation to manage asbestos in their properties since the introduction of CAWR2002;

- Which required compliance by 21<sup>st</sup> May 2004;
- Now replaced with Regulation 4 of CAR 2006.



# Available Documents to Assist in Management Duties

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## Purpose of Regulation 4

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- **To protect workers who may come across asbestos during the course of their day-to-day activities;**
  - Maintenance staff, plumbers, gas fitters, electricians, telecoms staff, handy man.

In an exercise to determine plumbers exposure to asbestos, a number of them were given passive samplers to wear. TEM analysis revealed 60% of them had been exposed to asbestos, yet only 20% had recorded that they were aware of working with or close to ACMs!

## Purpose of Regulation 4

*Bradley*  
ENVIRONMENTAL

- **To protect other people who may be at risk from the potential release of asbestos fibres into the air.**
  - Building occupants, visitors, cleaners.

It is a fairly common scenario that cleaners may be sweeping/vacuuming debris up from ACMs that are located in vulnerable locations and routinely getting damaged, and not aware of the material containing asbestos. The sweeping or vacuuming then raises air borne fibre concentrations putting other people in the vicinity at risk.

## Scope of Regulation 4

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- Non-domestic premises;
- Also, communal (and service) areas of blocks of flats;
- Does not apply to private dwellings (but note Defective Premises Act 1972).

# The Dutyholder

*Bradley*  
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## Regulation 4 (1)

- (a) every person who has, by virtue of a contract or tenancy, an obligation of any extent in relation to the maintenance or repair of non-domestic premises or any means of access thereto or egress there from; or*
- (b) in relation to any part of non-domestic premises where there is no such contract or tenancy, every person who has, to any extent, control of that part of those non-domestic premises or any means of access thereto or egress there from,*

*and where there is more than one dutyholder, the relative contribution to be made by each such person in complying with the requirements of this regulation will be determined by the nature and extent of the maintenance and repair obligation owed by that person.*



# The Dutyholder

*Bradley*  
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## Regulation 4(2)

*Every person shall co-operate with the dutyholder so far as is necessary to enable the dutyholder to comply with his duties under this regulation.*



## Dutyholder Duties

*Bradley*  
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- (a) take *reasonable steps* to find materials in premises likely to contain asbestos and to check their condition;
- (b) *presume* that materials contain asbestos unless there is strong evidence to suppose they do not;
- (c) make a *written record of the location and condition* of asbestos and presumed asbestos-containing materials (ACMs) and keep the record up to date;

## Dutyholder Duties

*Bradley*  
ENVIRONMENTAL

- (d) *assess the risk* of the likelihood of anyone being exposed to these materials;
- (e) prepare a *plan to manage that risk* and put it into effect to ensure that:
  - (i) any material known or presumed to contain asbestos is kept in a good state of repair;
  - (ii) any material that contains or is presumed to contain asbestos is, because of the risks associated with its location or condition, repaired or if necessary removed; and
  - (iii) information on the location and condition of the material is given to anyone potentially at risk.



## Dutyholder Duties

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- Assess whether premises contain asbestos
- Assess the risk from asbestos
- Manage the risk from asbestos

# Delegation of Duties

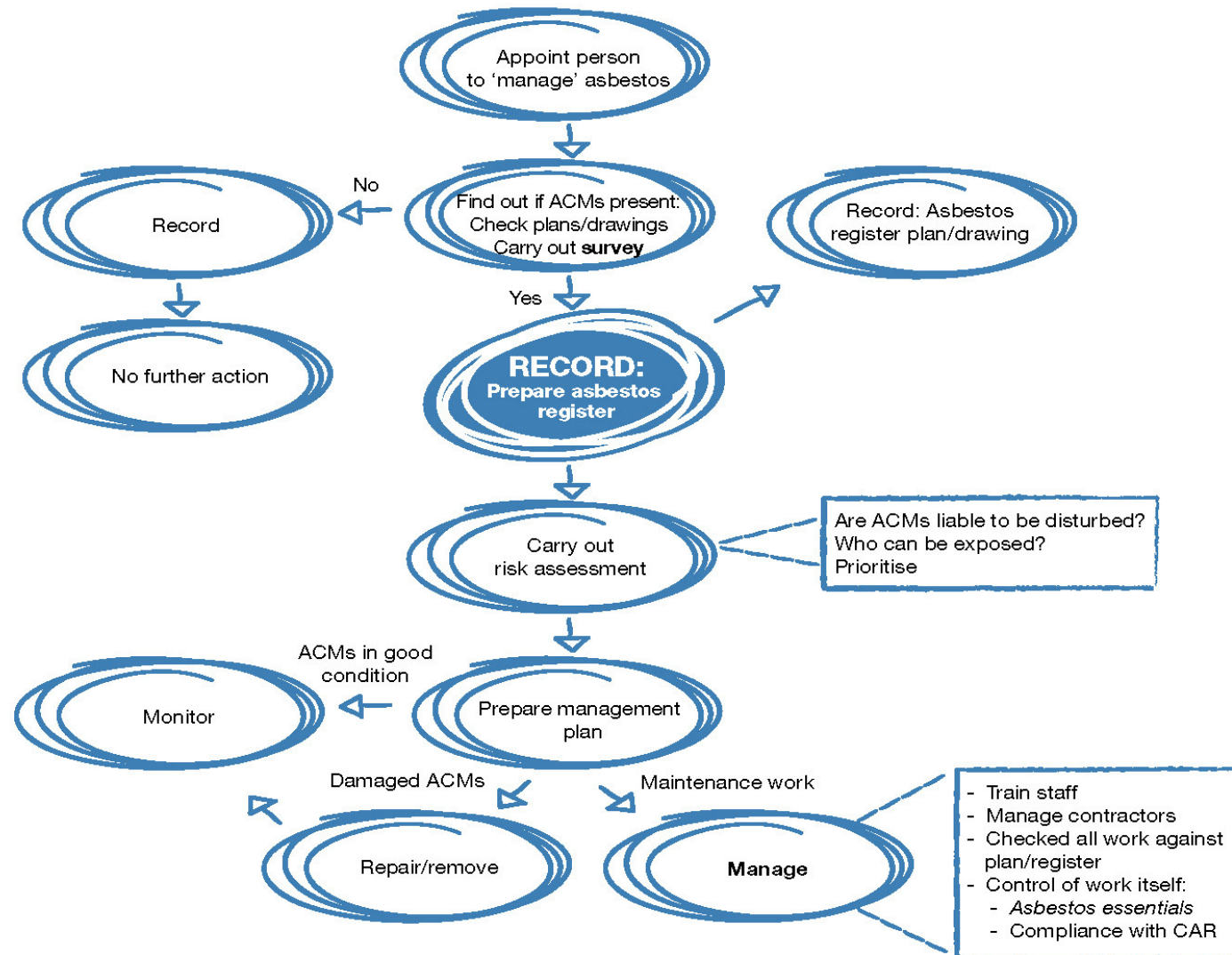
*Bradley*  
ENVIRONMENTAL

- In practice, the dutyholder will often delegate the finding and assessment of ACMs to a third party (the surveyor);
- It is recommended that the third party be accredited to ISO/IEC 17020, or
- Individuals can be accredited to ISO/IEC 17024.



# Main Steps in Managing Asbestos

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# Managing ACMs

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- Once the survey is complete, the dutyholder must put into place a Management Plan;
- This must prevent anyone from being put at risk by asbestos;
- This includes visiting contractors;
- The Plan must be written, up-to-date, include measures to manage the risks, and made available to anyone who may need to consult it.

- Information related to the material itself  
***(material assessment of HSG227 and HSG264);***
- Information related to the situation that the material is in ***(priority assessment of HSG227);***

***The priority assessment is the responsibility of the dutyholder.***