

# MDHS 100

## **Surveying, Sampling and Assessment of Asbestos Containing Materials in Premises for Management Plans**

The circulation draft of the above document was issued in January 2000 for Industries comments and as a result the ATaC Committee received the draft and have subsequently forwarded their comments to the Committee of Fibre Measurements. The MDHS has been produced to meet the duty to manage asbestos in non-domestic premises under the proposed Control of Asbestos at Work Regulations (CAWR) 2002. This legislation was signed by the Minister in November 2002, however, an 18 month lead in time was allowed. The legislation therefore comes into force on May 21<sup>st</sup> 2004 after which the HSE may bring prosecution cases against Companies who do not have a register in place.

These are the key elements for reader's information: -

### Introduction

This MDHS sets out how to survey workplace premises for asbestos containing materials (ACMs) and how to record the results in a usable form. It also gives advice on how to recognise and sample suspected ACMs and how to assess them for their relative risk, so that all the relevant information to produce a plan to manage the risk from asbestos is available. The MDHS has been produced as part of guidance issued by the Health & Safety Executive.

### Managing Asbestos

CAWR already places duty on employers before carrying out any work with asbestos to make an adequate assessment of any exposure to asbestos of his employees and to prepare a suitable written plan of work detailing how the work is to be carried out. The new duty to manage asbestos in non-domestic premises will require the employer to make an assessment as to whether asbestos is or is liable to be present. Where asbestos is or is liable to be present the employer has to prepare a written plan identifying the areas concerned and specifying the measures to manage the risks arising. Both the assessment and the plan have to be reviewed, recorded and updated regularly. The risks will vary with circumstances, ranging from normal occupation of a premises, to the repair, refurbishment and removal of the ACM and they will need to be assessed accordingly. The broad requirements on employers and building owners are to:

- Take suitable and sufficient steps to determine the location of materials likely to contain asbestos;
- Presume materials to contain asbestos, unless a reasoned argument to the contrary can be made;
- Make and maintain a written record of the location of the asbestos and presumed asbestos materials;
- Monitor the condition of asbestos and presumed asbestos materials at regular intervals;
- Assess the risk of exposure from the asbestos and presumed asbestos materials and document the actions necessary to manage risk;
- Take steps to see that the actions above are carried out;

To manage the risk from asbestos it will necessary to:

- Keep and maintain an up to date log of the location, condition, maintenance and removal of all asbestos containing materials on the premises;
- Repair, seal or remove, if there is a risk of exposure due to its condition or location;
- Maintain in a good state of repair;
- Inform anyone who is likely to disturb it about the location and condition of the material;
- Have arrangements and procedures in place, so that work which may disturb the materials complies with the CAWR;
- Review the plan at regular intervals.

### Asbestos Surveys

An asbestos survey has three main elements:

- Firstly, it must as far as reasonably practicable **locate and record** the location, extent and product type of any presumed or known ACMs;

- Secondly, it must **inspect and record** information on the accessibility, condition and surface treatment of any presumed or known ACMs;
- Thirdly, it should determine and record the asbestos type, either by collecting representative samples of suspect materials for laboratory identification, or by making a presumption based on the product type and its appearance etc. This information must be held in a suitable (upgradeable) form and should be accessible to and understandable by all relevant personnel.

### **Aim and Purpose**

The type of survey undertaken may vary, depending on the aim and purpose for which it is to be used. Surveys before demolition and refurbishment continue to be required under CAWR and the CDM regulations. However, it is anticipated that most surveys will be undertaken to comply with regulation 3A of CAWR to manage asbestos in premises. In these cases, the aim of an asbestos survey is to locate and assess all the ACMs present in the building and its purpose is to present the information collected in a way, which allows the employer to manage the risk. Therefore the aim, purpose and type of survey requires should be clearly established in the original invitation to tender, or agreed with the client at a preliminary meeting or site visit before starting the survey. One of the main issues is how frequently, sampling and analysis should be carried out to prove the ACMs are or are not present.

### **Type of Survey**

There are three types of survey referred to in this MDHS.

#### **Type 1: Location and assessment survey (Presumptive Survey).**

The purpose of the survey is to locate, as far as reasonably practicable; any suspect ACMs in the building and assess the risk. All areas must be accessed and inspected (e.g. above false ceilings and inside risers, service ducts, lift shafts etc.) or presumed to contain asbestos.

#### **Type 2: Standard sampling, identification and assessment survey. (Sampling Survey)**

The purpose and procedures used in this survey are the same as for type 1, except that representative samples are collected and analysed for the presence of asbestos. Samples from each type of suspect ACM found, are collected and analysed to confirm or refute the Surveyors judgement. Sampling may take place simultaneously with the survey, or as in the case of some larger surveys can be carried out as a separate exercise, after the type 1 survey is complete.

#### **Type 3: Full access Sampling and Identification Survey (Pre-demolition / Major Refurbishment Surveys.)**

This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the building and may involve destruction inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. A full sampling programme is undertaken to identify possible ACMs and estimates of the volume and surface area of ACMs made. The survey is designed to be used as a basis for tendering the removal of ACMs from the building prior to demolition or major refurbishment. The survey does not assess the condition of the asbestos other than to note areas of damage or where additional asbestos debris may be expected to be present.

Although different types of survey can be specified and used depending on the circumstances, it is important that the building Owner, Employer and the Surveyor know exactly what type of survey is to be carried out, what the specifications for each type are, and in which areas they are to be used. It is recommended that the type of survey used conforms to a standard (i.e. this MDHS), otherwise interpretation of the survey reports will be difficult and the management plan produced may not adequately minimise the risks involved. It is possible that larger premises a mixture of survey types will be appropriate - e.g. a boiler house due for demolition will require a type 3 pre-demolition survey, while offices at the site may have only have a type 1 survey. Similarly a system built housing estate may start with several type 2 surveys but other similar premises may be evaluated using a type 1 survey. Therefore it is important that there is a clear statement and record of the type of surveys that are to be carried out, where they are to be carried out and an estimate of the number of samples to be collected given. It is hoped the finalised document will be issued in the near future following a short period of consultation.