

Assessment of risk and Plans of Work (Method statement) for licensed asbestos removal contractors

Introduction The following explanatory paragraphs and aide memoire are designed to assist licensed contractors to produce better, site specific Plans of Work and in turn reduce the volumes of unnecessary paper HSENI receives.

In order to ensure that Plans of Work are relevant to the work in progress HSENI require that Plans of Work are submitted in two parts:-

Part a) The current version of the company's standard procedures (e.g. decontamination, entering/leaving enclosure). A copy of these should be submitted biannually to HSENI and be permanently available to site staff.

Part b) The site specific Plan of Work which will be submitted with the notification and again will be available to site staff.

The site specific Plan of Work must accompany each notification and failure to comply will be a breach of your licence condition and could lead to withdrawal or suspension of your licence.

1 The Management of Health and Safety at Work Regulations (NI) 2000 require an employer to carry out an assessment of the risks to the health and safety of their employees and persons not in their employment.

2 The Control of Asbestos Regulations (NI) 2007 also require the employer to carry out an assessment of the potential exposure before commencing any work with asbestos and to record the significant findings in the Plan of Work. All risk assessments and Plans of Work should be prepared by a competent person, who has knowledge and experience of the type of work, best practice and is familiar with all the current control measures.

3 The risk assessment is a vital first step to inform the Plan of Work. The information contained in the assessment about the condition and type of asbestos containing material, the site specific location, any client or location restrictions that might apply, etc should be the basis for the control measures set out in the Plan of Work. The assessment must be suitable and sufficient, **be site specific** and must address the issues contained in paragraph 67 of the ACoP L143^{Ref 1}. The risk assessment and Plan of Work should be reviewed and revised when no longer valid or if the work method has changed.

4 The purpose of the Plan of Work is to provide a practical document, which summarises the key control measures required **based on the specific features of a particular location and the work involved** and is intended to direct the work of the asbestos removal team (ACoP L143 paragraphs 76 to 86 outline what is required).

5 Plans of Work should not contain vast amounts of generic information that contain little (or no) information about specific site issues. In order to make the Plan of Work as relevant and site specific as possible, generic information about company procedures in relation to hygiene

facilities, decontamination, transiting, site inspections, equipment checks (including RPE), bagging of waste and emergency arrangements should **not** be included in individual Plans of Work, other than by cross reference. Instead this information should be contained in the latest version of the company's standard procedures, a copy of which should be retained on site. The information need only be expanded upon in the individual site specific Plan of Work when there is a difference between the procedures contained in the company's generic material and what is proposed on site. For example, the Plan of Work should include features specific to the site such as the location of the decontamination unit (DCU), the transit route, how a modular DCU is to be deployed and restricted to use by one/two persons, etc.

6 Generic Plans of Work are not acceptable, unless they are designed to cover a series of very similar asbestos removal jobs e.g. at a block of flats or a series of houses in one location where the method is applicable to each property.

7 The aide memoire given on pages 3 and 4 of this document can be regarded as a practical interpretation of the L143 ACoP requirements. It summarises the site specific information that should be **considered** in a Plan of Work, with supporting general information contained in the current version of the company's standard procedures.

8 ***Contractors should also consult the HSE publication 'Asbestos: The licensed contractors' guide'^{Ref 2} which gives guidance, within chapter 3, regarding the preparation of a Plan of Work.***

9 If HSENI find that a particular Plan of Work does not contain at least the minimum information required by The Control of Asbestos Regulations (NI) 2007, it may be rejected with an explanation as to the deficiencies. The licence holder will then have to resubmit their Plan of Work and the fourteen days notification period will only start once the Plan of Work is accepted.

(NB Full notification consists of a completed ASB5-NI form (or equivalent), a suitable and sufficient site specific Plan of Work (including reference to the current version of the company's standard procedures) and a copy of the licence. If any of the papers are missing, the notification is incomplete and the fourteen day notification period cannot start).

References

1. L143 - Work with materials containing asbestos. Approved Code of Practice and Guidance.
2. HSG247 – Asbestos: The licensed contractors' guide.

Plan of Work (Method statement) Aide Memoire

NOTE: The Plan of Work only needs to spell out site specific details. Generic information contained in the current version of your company's procedures in relation to hygiene facilities, decontamination, transiting, site inspections, equipment checks, PPE, bagging, storing, transporting of waste and emergency arrangements, etc should be available at all times on site. This information need only be expanded upon in the Plan of Work if the on site procedures will differ from the standard arrangements.

1 Details of contract. State:

- The name and local address of the persons to whom you are contracted
- The names, job titles, and telephone numbers of all relevant contacts, including your site supervisor and the competent person preparing the Plan of Work
- When the supervisor will be on site
- The number of employees on the job at any time
- When the work is going to take place ie dates and times (nights, week end work, etc), the dates for set up, removal and clearance.
- The names of the principal contractor, the Planning supervisor and CDM (*Construction (Design and Management) Regulations [NI] 1995*) client, if CDM applies
- The name(s) of any other asbestos licence holders involved
- Who will carry out the 4 stages of the clearance process and issue the certificate of reoccupation. Provide the name of the analyst and to whom they are contracted

2 Scope of work and risk assessment:

- Provide brief details of any asbestos survey, the level (Type 1, 2 or 3) who did this and when
- Provide a description of the work, its location and the removal method
- State the type and form of asbestos, the quantity, extent and condition
- Provide brief details of any access and fire risks and precautions taken
- Who will consider departures from the Plan of Work and how will these be noted and recorded on site?

3 Control measures:

- State the expected exposure using controls specified
- Describe the steps taken to reduce exposure as low as reasonably practicable and to control release into the environment
- Provide a sketch(es) showing size of enclosure(s), location of viewing panels, negative pressure units, H-type vacuum cleaners, DCU, transit routes, bag locks, waste routes, skips etc, and include the positions from which the water and electrical supplies to the DCU are to be fed
- State the volume of enclosure, size and numbers of NPU s and number of air changes per hour

- State the type of respirators used
- Describe the air monitoring arrangements for duration of the work
- Describe the arrangements for smoke testing and witnessing.
- Describe how control measures are to be maintained on site and what checks are to be in place.

4 Method of work for removal:

- State any additional precautions to reduce exposure
- Provide detailed site information and a site specific description of the working method to be used with reasons
- Describe which fibre suppressant technique is to be used
- For wet strip system – describe injection technique, time allowed for penetration, what indicator will be used to check material is fully saturated
- State what tools and other equipment are to be used
- For AIB work, provide a proper indication of practical measures to minimise dust release

5 Other relevant site specific information: not in company procedures and relating to:

- DCUs (including clearance testing)
- Entry and exit procedures
- Welfare facilities
- Waste disposal
- Emergency procedures (including asbestos disturbance during enclosure erection, etc)

6 State the version/date of your company's standard procedures which apply.

NB: Work should not take place until there is a copy of the Plan of Work available on site and it should be made available to employees, to the person carrying out the 4 stage clearance process and to any others involved in the work, as necessary. Any changes to the Plan of Work should be notified in writing to the HSENI.