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Background

The request for new/additional PoW guidance is a direct outcome of the CAR2012 Post-Implementation Review conducted in 2017. HSE has committed to issuing this new guidance by the autumn of 2018, sooner if ready. It is envisaged that after/while circulating the materials below internally for comment and suggestions for improvement, feedback and ideas are also invited from the main trade associations. A natural opportunity for this would be the next ALG on 23 May 2018.

DISCUSSION DOCUMENT

For discussion and possible inclusion (in parts) in the revised Licensed Contractors Guide, along with the checklist if agreed

- 1) There are many ways to create a suitable Plan of Work (PoW) and comply with Reg 7 of CAR2012. Reg 7 describes specific absolute requirements for the PoW, these should be met. There is more detail in the ACoP which accompanies Reg 7.
- 2) "The Plan of Work should be a practical and useful document, describing a safe working method for staff to follow. It should include details of the work, and the appropriate actions to control risk and prevent harm. These are the principles which underpin the suggested checklist and planning prompts below.
- 3) It is the duty of the employer to produce a suitable PoW at the time of notification. This is one of the standing licence conditions. It is not sufficient to produce an 'outline' plan at the time of notification and to develop the detail as the work progresses. The work should be planned before it starts, not while it is underway. That is not to say that changes can't be made to the written plan where that turns out to be necessary – but significant changes to the material parts of a PoW should be the exception, not the rule.
- 4) The ultimate fitness for purpose of a PoW can be measured in its use on the job, and the licensed contractor should be able to demonstrate that with thorough site checks and audits. Some companies tell HSE that their staff know how to do the work and don't require a detailed written PoW. That way of thinking misses the point. The PoW is primarily there to direct and support the site team, but it is not for the site team alone that a PoW gets produced – the analyst, for example, will need to check the PoW carefully against what she sees prior to commencing the 4SC process. Regulators, especially in a permissioning regime, will also wish to use the PoW as a tool to measure the effectiveness a business in managing asbestos work.
- 5) There is in theory a range of possible approaches to writing PoWs - from making them fully self-contained to leaving out all information that is already covered elsewhere and concentrating on what is different or unusual about this particular job.

In practice, it should be possible to strike a realistic balance between those two approaches. In all cases HSE would advise to err on the side of user friendliness

- by avoiding overlong PoWs, because crucial site specific detail is likely to be lost among lengthy generic procedures; and
 - by making any necessary cross referencing to other documents as easy and straightforward as possible for all parties.
- 6) HSE is not currently planning to provide a model or template PoW because many companies already have developed formats and styles which are suitable and work for them, but who would be tempted to move away from these in order to adopt the 'model'.

- 7) That said, it is clear that some companies struggle to translate their planning activities, and the conclusions drawn from them, into a suitable written format, be that in hard copy or digital form. The following checklist with prompt questions in places is designed to assist with this, although it is not meant to be, and really cannot be, an exhaustive list. Some elements in the list could be addressed in standard operating procedures.

Plan of Work - contents checklist and prompt questions

CONTRACT and SCOPE OF WORK

- Full address and work location
- Precise location, extent/quantity, type and form of asbestos to be removed
- Clear scope of work and site constraints, including any ACMs that are to be left in situ
- Start and finish date of work, work dates and site times, incl for supervisor and analyst
- Number of site personnel engaged in the work, including persons outside the enclosures
- Name and contact details of client, principal contractor, licenced contractor's senior managers, supervisor, analyst, and other licence holder(s) involved
- Survey information

EQUIPMENT AND MATERIALS – not an exhaustive list

- DCU – number, type
- RPE and PPE
- NPUs and H-type vacuum cleaners
- Roving heads
- Exhaust ducting
- Enclosure, airlock and baglock materials and tools
- Smoke generator
- CCTV, or viewing panels
- Fibre suppression equipment
- Wet injection system
- Barriers, fencing, tape, signage
- Cutting tools
- Other handtools
- Quantities of Waste bags, 1000 gauge polythene, adhesive tape and other consumables
- Lighting
- Access and work at height equipment
- Other job specific specialist equipment
- Any other equipment needed for the job

COMMUNICATION AND SUPERVISION – some of these might be covered in SOPs

- How will this job be supervised?
- How is the PoW communicated?
- How will you liaise with the client, the Principal Contractor, the analyst, other licence holders?
- What will senior managers' involvement be for this job?
- How will changes to the PoW be managed?

SPECIAL CHARACTERISTICS OF THE SITE and its vicinity

- For example, is it a school (term time? School holidays? Community activities taking place?), a live hospital, a care home, or is such a facility very close to the work location? Is the site a tenanted flat (Access? Liaison with landlord? Flat empty or occupied during works?)
- What are the implications of this for the job at hand eg for access, site hours, waste management, contact with members of the public?
- Any other site features that impact on the job and how they will be managed?
- How will waste and transit routes be kept segregated from eg visitors or staff?

ENCLOSURE(S)

- Construction of enclosure(s)
- Volume of enclosure(s)
- Location and dimensions of airlock and baglock
- If no baglock, why not?
- If airlocks are below 1mx1mx2m can the other dimension be increased to compensate?
- In fact, is there space to make the airlocks bigger anyway?
- Details and locations of viewing panels or CCTV
- Warning notices/signage
- Method of smoke testing, witnessing and recording
- Impact of eg weather if enclosure is outdoors
- Integrity checks

SITE DIAGRAM/SKETCH (where possible with PHOTOGRAPHS) to show at least

- The enclosure(s) or work area(s)
- Adjacent rooms or areas to the enclosure or work areas
- Location of viewing panels
- Location of NPU's
- Location of airlock
- Location of baglock
- Location of the decontamination unit (DCU)
- Location of the skip
- Transit route
- Waste route

METHOD AND SEQUENCE OF WORK

- Removal technique to be used
- How this technique will be used on this particular job
- If it is not removal (eg encapsulation), describe this here
- If there is a particular sequence to the work, describe this here, including the interaction with the work of the client or other contractors.
- How tools and equipment will be used
- Any hold points without which work cannot start of progress (eg DCU fully operational, saturation check for wet injection, service isolation confirmation)

CONTROL MEASURES – ASBESTOS

- Details of expected exposure levels
- Specification and siting of negative pressure unit(s)
- Air management in the enclosure: 1000m³/hr for enclosures of <120m³, or number of air changes per hour for enclosures >120m³. This should include planned action with enclosure changes (eg opening voids).
- Fibre and dust suppression methods used
- Use of H-type vacuum cleaners (eg shadow vacuuming)
- RPE (including type and specification of respirator) and PPE
- Maintenance arrangements for this equipment
- Decontamination of employees
- Examination of controls etc and record keeping

CONTROL MEASURES – NON-ASBESTOS

- Services and their isolation (gas, electricity, hot pipes etc) and who is responsible for these (client?) and the hand over and documents needed
- Impact of these on proposed work method
- WAH including equipment
- Fragile surfaces
- Any other control measures as determined by your site specific risk assessments

AIR MONITORING

- When and where it will be carried out
- By whom and, in case of personal monitoring, on which personnel
- Sampling times and flow rates for personals agreed with analyst
- Analysis by which laboratory

WASTE MANAGEMENT AND DISPOSAL

- Bagging procedure – in conjunction with waste dimensions (eg AIB panel size)
- Temporary storage for bags (if any)
- Waste routes
- Skip location
- Uplift, transportation and disposal arrangements
- If van is used for small amounts– condition, cleanability, no tools or other equipment

CLEARANCE

- Final cleaning arrangements
- Checking enclosure is clean before handover to analyst
- Safe access and/or working platforms at height in place for analyst
- Handover to highlight anything left in the enclosure for later removal (eg alloy tower, large waste items)
- Full coordination and cooperation with analyst during 4SC, including arrangements access ,e.g. for work at height, and the time planned for clearance

DECONTAMINATION

- Cleaning and vacuuming before leaving enclosure
- Transiting or direct connection?
- DCU procedures

EMERGENCY PROCEDURES taking account of the specific characteristics of the site

- Fire precautions
- First aid arrangements
- Minor incident procedures
- Major incident procedures

SITE DOCUMENTATION – any that are digital in format must be able to be read at any time on site

- Copy of asbestos licence
- Plan of Work/Method statement
- Training certificates
- Face fit test certificates
- Certificates of statutory medicals
- Equipment maintenance and inspection records (eg for NPUs, H-type vacuum cleaners; RPE)
- Record of smoke test
- Record of inspections of enclosures, DCUs etc (aka check sheets)
- Clearance certificate for DCU
- Isolation of services records
- Site log or diary
- Other records as per your company procedures