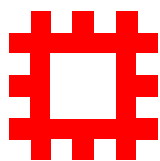


8.32 MARBLE HILL HOUSE - ASBESTOS MANAGEMENT PLAN



ENGLISH HERITAGE

asbestos management plan

marble hill house



ASBESTOS MANAGEMENT PLAN

MARBLE HILL HOUSE TWICKENHAM

ISSUE DATE: OCTOBER 2015
REVISION: 04
ON BEHALF OF: ENGLISH HERITAGE
 ESTATES TEAM LONDON

ASBESTOS MANAGEMENT PLAN

MARBLE HILL HOUSE, TWICKENHAM

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0 FORMAL REVISION RECORD

DATE/No.	PARA./SECTION	NATURE OF REVISION
Oct 2015 Revision 04	Issue Page	Re-issued by Estates Team rather than an individual
	Various	Changed "assumed" to "presumed" to be more consistent with standard industry terminology
	Revision Record	Updated with latest amends
	1.1	"Background" changed to "Purpose of this Document"
	1.2	Clarified survey details and updated table of surveys
	1.3	Updated following more recent surveys
	1.3	Definitions of "Management Survey" and "Refurbishment and Demolition Survey" added
	1.4	Replaced "licensed contractors" with "asbestos contractors" as not all works require a HSE licence
	1.4	Added references to foreseeable maintenance
	1.5	Changed Control of Asbestos Regulations 2006 to (latest) 2012 edition
	1.5	Added training requirements for maintenance personnel
	1.5	Added that list of regular maintenance personnel and contractors can be amended manually on site or in the London Office if required
	1.5	Changed wording from: "maintenance personnel or contractors <u>must</u> acknowledge and refer to prior to commencing any work" to "maintenance personnel or contractors <u>should</u> acknowledge and refer to prior to commencing any work"
	1.6	Clarified position on labelling in-situ ACMs
	1.6	Added that tool-box talks can also be carried out by the Duty Manager
	1.8	Clarified that sections of the Plan "may be distributed" as against "are distributed"
	1.9	Clarified wording
	3.5	All tables updated to detail latest/next inspection dates and latest survey and re-inspection findings
	3.5	All Asbestos Material Assessments redesigned and updated, images added for clarity, locator plans added where useful
	3.6.1	Changed Control of Asbestos Regulations 2006 to (latest) 2012 edition
4.2	Clarified that need for additional surveying (if required) should be completed as far as possible well in advance of the works	
4.4	Example Permit to Work re-issued with later issue date	
4.7	Help Desk contact details updated	

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DATE/No.	PARA./ SECTION	NATURE OF REVISION
Oct 2015 Revision 04 (cont.)	5.1	Monitoring frequency clarified to indicate that frequency will be based on risk in each particular instance, as against an arbitrary future date
	5.2	Clarified where/how formal re-inspections are recorded
	Appendix 1a	Note added explaining use of table
	Appendix 1b	All floor plans updated to current issue status
	Appendix 3b	Changed Control of Asbestos Regulations 2006 to (latest) 2012 edition

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DATE/No.	PARA./ SECTION	NATURE OF REVISION
Mar 2010 Revision 03	Revision Record	Updated
	1.3	Background information previously with Asbestos Register now included here for clarity
	1.3	Reference made to fact that surveys are based on HSE document MDHS100, which has now been superseded by now document HSG264. References to MDHS100 left in as that was what the surveys were originally based on. Future surveys to be in accordance with HSG264.
	1.4	Renumbered
	1.5	Renumbered
	1.5	Text changed to indicate that external maintenance personnel or contractors <u>may</u> be given copy of the Plan (or part thereof) at the discretion of the Dutyholder instead of <u>will</u> be given a copy of the Plan.
	1.6	Renumbered
	1.7	Renumbered
	1.8	Renumbered
	1.9	'Health Hazards' moved to end of section to maintain clarity and logical flow of other paragraphs in the section.
	3.1	Asbestos Register background info moved to section 1.3
	3.1	Paragraph added to clarify that not all spaces/voids may have been accessed, and any spaces/voids not accessed are to be presumed to contain ACMs until further inspection carried out.
	3.2 (inc. sub-sections)	Asbestos Register updated with latest inspection findings.
	3.3.4	Line added to Risk Assessment to detail last inspection date and any subsequent revisions to the assessment identified as a result of the re-inspection.
	4.7	Help Desk contacts changed to mobile number and email only
	5.4	Paragraph added to detail that revisions to the Plan identified as part of the review process will be detailed in the Revision Record.
	Appendix 1b	Drawings updated in line with issue of Asbestos Management Plan

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DATE/No.	PARA/ SECTION	NATURE OF REVISION
Nov 2008 Revision 02 (continues next page)	Revision Record	Table reversed to show latest revisions first
	1.2	Asbestos Management Plan now specific to single property (including associated outbuildings). Details of other properties omitted.
	1.3	Revised to include reference to subsequent gathering of information since original asbestos survey carried out.
	1.6	Control of Asbestos at Work Regulations 2002 revised to Control of Asbestos Regulations 2006
	1.6	Added reference to Latest updates at Appendix 1
	1.6	Reference to Information Notices moved to new section 1.7
	1.7	New section - Promulgation of Information
	1.8	Procedure revised - reference to review schedule omitted
	2	Requirement for signature omitted from Asbestos Policy
	3.1	Revised to include reference to subsequent gathering of information since original asbestos survey carried out.
	3.2	Asbestos Register updated with latest formal review dates
	3.3.1	Control of Asbestos at Work Regulations 2002 revised to Control of Asbestos Regulations 2006
	3.3.4	Last inspection dates updated
	4.1	Revised procedure - Permit to Work Issue Log omitted. Added reference to Latest updates at Appendix 1.
	4.2	New text and new flowchart to include possible requirement for further Type 2 or Type 3 inspection before commencing works.
	4.4	Updated Example Permit to Work Form
	4.5	New section - Action to be taken on identifying suspect material.
	4.6	Additional provisions for emergency action in the event of accidental damage to ACMs and emergency contacts.

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DATE/No.	PARA./SECTION	NATURE OF REVISION
Nov 2008 Revision 02 (continued)	4.7	Helpdesk contact numbers updated.
	Ex 4.7	Permit to Work Issue Log omitted.
	Ex 5.1	12 Month Action Plan omitted.
	5.1	New provisions for re-inspection and schedule.
	5.2	New provision for recording inspections of ACMs in-situ.
	5.3	New provision for reviewing Asbestos Management Plan
	5.4	New provision for updating Asbestos Management Plan
	Appendix 1a	New provision for recording ad-hoc amends, results of interim inspections, notes, etc.
	Appendix 1b	All drawings re-issued with corrections/amendments where required.
	Appendix 2	New section for retention of Permit to Work forms and related information/documentation.
	Appendix 3	Asbestos Information & Awareness Notice and Asbestos Management Plan Information Sheet combined in single Appendix.
May 2007 (Manual amend)	Revision Record	Updated
	3.2.3	Asbestos Register amended for Coach House Café seating area due to removal of AIB doors/linings
	5.1	Action Plan updated after re-inspection
	5.2	Schedule of re-inspection findings added at end of 5.2
	Appendix 1	Schedule of drawings amended
	Appendix 1	Coach House - Ground Floor drawing amended
Feb 2007 (Manual amend)	5.1	Action Plan updated after re-inspection
	5.2	Schedule of re-inspection findings added at end of 5.2

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DATE/No.	PARA./ SECTION	NATURE OF REVISION
Oct 2005 Revision 01	All	Page numbering system changed to Chapter-Page number.
	3.2.3	Flat 2 roof space added to Register
	3.3.4	Flat 2 roof space added to MHH-AMP-13
	5.1	Action Plan updated
	Appendix 1	Drawings updated
June 2005 Revision 00	All	Initial issue of Asbestos Management Plan

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1 INTRODUCTION

1.1 Purpose of this Document

This Asbestos Management Plan [the Plan] sets out the principles and methods by which English Heritage Estates Team London will manage the risk from known, presumed or suspected asbestos-containing materials [ACMs] in the buildings and properties under their control.

1.2 Properties Covered

Since mid-2004, a mixture of Type 1 and Type 2 (as they were previously known) asbestos inspections have been carried out to augment the information already available regarding the known or suspected presence of ACMs in the property. This copy of the Asbestos Management Plan relates specifically to Marble Hill House, Richmond Road, Twickenham, Middlesex TW1 2NL. The areas surveyed and type of inspection carried out are as follows:

PROPERTY/FLOOR	SURVEY
Main House	Type 2
Coach House Flat 1 and Flat 2	Type 2
Coach House, Café, Office, Public toilets and Store	Type 2
Ticket Hut	Type 2
Beaufort Lodge	Type 2
White Lodge	Type 2
Old Toilets	Type 2
Ice House	Type 1
Park Offices & Changing rooms	Type 2
Contractor's stores	Type 2
One O'clock Club (Nursery) buildings	Type 2
Adventure Playground buildings	Type 2
Changing Block/Stores (behind Coach House)	Pre-refurbishment

1.3 Survey Documents

This Plan is based on the asbestos survey report issued in February 2005, which contains further information about the ACMs identified along with pictorial evidence where available, and is augmented by the Type 1 inspection carried out in January 2009 and the additional survey of the Changing Block/Stores in March 2015. Copies of the survey reports are maintained on site and/or by the Estates Team in London. Where the information in the original reports has been augmented as a result of subsequent inspections and findings, the original survey reports are not updated, but instead all new or revised information is detailed in this Plan.

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Prior to the survey works commencing, a review was carried out by the Estates Team. From this review it became apparent that much of the in-situ ACMs were already known about, albeit not formally documented.

In response to the nature, age and much of the internal construction of the buildings, coupled with the Estates Team's existing knowledge of the buildings, space usage, refurbishment history, and building materials, either a Type 1 or Type 2 survey (as defined in Health and Safety Executive method MDHS 100 Surveying, sampling and assessment of asbestos-containing materials - July 2001¹), or more recently a Management Survey or Pre-refurbishment/Demolition survey (depending on individual requirements in different properties/spaces) was commissioned in order to formulate the Asbestos Management Plan.

The purpose of the inspections was therefore to conduct different types of asbestos surveys of accessible parts/areas, with the objective being to establish as far as reasonably practicable the presence, type and extent of asbestos-containing materials [ACMs] in the buildings, including the fixtures and fittings.

If there is any doubt as to what the material is, it will be presumed to be asbestos-containing until advised to the contrary.

In accordance with HSE document MDHS100, survey Types 1 and 2 are defined as follows:

Type 1 - Location and assessment survey (presumptive survey)

*The purpose of the survey is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building and assess their condition. This survey essentially defers the need to sample and analyse for asbestos (or the absence thereof) until a later time (e.g. prior to demolition or major refurbishment). The duty holder bears potential additional costs of management for some non-asbestos-containing materials. All areas should be accessed and inspected as far as reasonably practicable (e.g. above false ceilings and inside risers, service ducts, lift shafts, etc.) or must be **presumed** to contain asbestos. Any material which can reasonably be expected to contain asbestos must be presumed to contain asbestos, and where it appears highly likely to contain asbestos, there should be a **strong presumption** that it does. All materials which are presumed to contain asbestos must be assessed.*

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 surveyor's judgement. If the material sampled is found to contain asbestos, other similar homogeneous materials used in the same way in the building can be strongly presumed to contain asbestos. Less homogeneous materials will require a greater number of samples. The number should be sufficient for the surveyor to make an assessment of whether asbestos is or is not present. 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.

In accordance with the more recent HSE publication HSG264 (Asbestos: The survey guide), survey types are defined as follows:

Management survey

A management survey is the standard survey. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

Management surveys will often involve minor intrusive work and some disturbance. The extent of intrusion will vary between premises and depend on what is reasonably practicable for individual properties, i.e. it will depend on factors such as the type of building, the nature of construction, accessibility, etc.

¹ Since carrying out the surveys, MDHS100 has been replaced by HSG264 Asbestos: The survey guide. Under the new HSE document, the principles of Type 1 and 2 surveys are now jointly classified as 'Management Surveys'. The principles of the original Type 3 survey is now classified as a 'Refurbishment and demolition survey'. However, as MDHS100 formed the basis for the original surveys, this reference remains in the Plan. Any future surveys of this property will be carried out in accordance with the new document (HSG264).

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A management survey should include an assessment of the condition of the various ACMs and their ability to release fibres into the air if they are disturbed in some way. This 'material assessment' will give a good initial guide to the priority for managing ACMs as it will identify the materials which will most readily release airborne fibres if they are disturbed.

The survey will usually involve sampling and analysis to confirm the presence or absence of ACMs. However a management survey can also involve presuming the presence or absence of asbestos. A management survey can be completed using a combination of sampling ACMs and presuming ACMs or, indeed, just presuming. Any materials presumed to contain asbestos must also have their condition assessed (i.e. a material assessment).

Refurbishment and demolition surveys

A refurbishment and demolition survey is needed before any refurbishment or demolition work is carried out. This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach.

A refurbishment and demolition survey may also be required in other circumstances, e.g. when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.

There is a specific requirement in CAR 2012 (regulation 7) for all ACMs to be removed as far as reasonably practicable before major refurbishment or final demolition. Removing ACMs is also appropriate in other smaller refurbishment situations which involve structural or layout changes to buildings (e.g. removal of partitions, walls, units etc). Under CDM, the survey information should be used to help in the tendering process for removal of ACMs from the building before work starts. The survey report should be supplied by the client to designers and contractors who may be bidding for the work, so that the asbestos risks can be addressed. In this type of survey, where the asbestos is identified so that it can be removed (rather than to 'manage' it), the survey does not normally assess the condition of the asbestos, other than to indicate areas of damage or where additional asbestos debris may be present. However, where the asbestos removal may not take place for some time, the ACMs' condition will need to be assessed and the materials managed.

1.4 Plan Objectives

The main objectives of this plan are to:

- Ensure the safety of our staff, occupants, tenants and/or visitors by not exposing them to airborne asbestos fibres;
- Ensure that damaged or deteriorated ACMs are removed or otherwise made safe by specialist asbestos contractors in a timely and cost-effective manner;
- Have controls in place to ensure that ACMs remaining in-situ are not accidentally damaged or otherwise interfered with during normal day-to-day operations, including foreseeable maintenance;
- Have procedures in place to ensure that contractors do not carry out any work on the building without first being aware of the possible presence of ACMs and the controls to be adopted, including prior safe removal of ACMs that will or may be damaged or otherwise disturbed as a result of refurbishment or other building/maintenance works;
- To utilise the services of outside specialist consultants and/or contractors as required to assist in implementation of the Plan, including creating and maintaining safe parameters within which the Plan can function.

1.5 Responsibilities

In order for this Plan to be effective, everybody must understand and carry out his or her responsibilities in so far as they affect the operation and success of the Plan.

In general, the Estates Team in London (and for the purposes of the Plan the 'Dutyholder') has overall responsibility for the creation, implementation, monitoring, review and revision of the Plan, its controls and its processes.

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1.6 Promulgation of Information

Employees are provided with the necessary information via labelling of ACMs in-situ (where practicable taking into account the nature of the property), access to relevant sections of the Plan as appropriate to the works being carried out, and the Information Sheets at Appendix 3 of this Plan. This can be further augmented by tool-box talks from the Estates Team and/or Duty Manager when considered appropriate.

Contractors are provided with information via copies of the relevant sections of the Plan as appropriate to the works being carried out and labelling of ACMs in-situ. This is again augmented by tool-box talks from the Estates Team and/or Duty Manager when considered appropriate.

1.7 Review Process

ACMs remaining in-situ will be monitored on a regular basis to ensure that ACM is - and will remain - in a safe condition.

Control procedures, permit systems, etc., will also be reviewed on a regular basis to ensure effectiveness of the Plan.

Reviews and subsequent follow-up actions will be documented.

1.8 Distribution

A bound, printed copy of this Plan is maintained by the Duty Manager for the property, with a further copy (either hard-copy and/or electronic copy) maintained by the Estates Team in London.

Sections of the Plan can be distributed as required to individual properties, contractors, outside organisations, etc.

1.9 Health Hazards

Asbestos is a generic term given to a number of naturally occurring fibrous hydrated silicates, all with similar fibre characteristics. Asbestos can be found in many parts of the world, but to date the largest deposits have been found in North America, the (old) Soviet Union, and in South Africa.

Asbestos has long been commercially exploited for its useful properties, these being:

- ⇒ Heat and fire resistant
- ⇒ Acid and alkali resistant (except chrysotile)
- ⇒ Poor conductor of heat and electricity
- ⇒ Fibres have a high tensile strength
- ⇒ Fibres are flexible

All asbestos is potentially dangerous, although blue (crocidolite) and brown (amosite) are known to be more dangerous than white (chrysotile).

Asbestos is only a risk to health if fibres are released into the air and subsequently inhaled. If ACMs are not disturbed airborne fibres will not be released and therefore they will not pose a risk to health.

Fibres can be released from raw, unsealed asbestos, by accidental mechanical damage, or by uncontrolled removal. Asbestos materials that are sealed and in good condition will not pose a hazard to health as long as they remain that way. If, however, the asbestos is disturbed or damaged, it can become a danger to health because asbestos fibres will be released into the air and people can breathe the fibres in.

It should, however, be noted that the increased risk to health from a small one-off exposure is generally negligible and not a cause for concern. The Estates Team in the first instance (or in an emergency the Help Desk) can provide further information and guidance in this respect.

2 ASBESTOS POLICY

We acknowledge our legal duty to prevent the exposure of our employees, occupants, tenants and visitors to asbestos, or if that is not possible to reduce it to the lowest possible level.

We further acknowledge our duty to manage the risk from asbestos in our premises, and to this end a management plan has been prepared and implemented. This plan will enable us to

- be aware of asbestos in our premises;
- assess the risk;
- eliminate the risk wherever practicable; and
- plan works so as to avoid accidental or uncontrolled damage to managed asbestos remaining in-situ.

Having established safe asbestos parameters in our properties, we will monitor, review and update the plan as necessary in order to ensure the future safety of our employees, occupants, tenants and visitors by preventing or reducing the hazard to health associated with airborne asbestos fibres.

We will achieve this by:

- Providing information on the locations of ACMs to all our employees and contractors.
- Keeping such information up to date and ensuring that it is readily available.
- Implementing systems to ensure that no building related works or any other operation is carried out that may impact on ACMs in-situ without appropriate controls and/or permits being in place.
- Regularly monitoring the condition of ACMs in-situ, through both physical examination and by way of promoting reporting by staff and contractors of any damage to confirmed, presumed, or suspected ACMs.
- Employing specialist asbestos advisors and/or consultants to maintain and maximise the benefits to English Heritage property personnel in the management of asbestos risks.

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3 LOCATIONS OF CONFIRMED, PRESUMED OR SUSPECTED ACMs

3.1 General

The Asbestos Register is based on information obtained either during the original asbestos survey, or as a result of further specific inspections of localised areas, or obtained as part of the ACM review/re-inspection process. It should be noted that not all areas have been accessed, particularly some roof voids, floor voids, wall voids, behind listed/protected finishes, etc. As such, if a space or other part of the structure has not been accessed it should be presumed that ACMs are present and a precautionary approach adopted until a proper inspection is carried out. Further inspections will be arranged by the Estates Team.

To avoid future confusion, suspect materials (i.e. potentially ACM) identified during the survey that was later found on analysis of sample(s) to be non-asbestos is indicated in black text.

Red text indicates asbestos-containing material [ACM] either confirmed, strongly presumed, presumed or suspected (see 3.2 for definitions). Also indicates spaces that were not accessed as part of the survey, and as such, a cautionary approach should be adopted if these areas are subsequently accessed.

Struck-through red text (**example**) indicates ACMs that have been removed. They are still included in the Register for historical information, but there is no Material Assessment for removed asbestos materials.

“Last inspection” gives the date of the last formal inspection in order to revise/update the Asbestos Management Plan. “Next Inspection” is the recommended timeframe for a formal re-inspection.

3.2 Status Definitions

- | | | |
|----------------------------|---|---|
| Confirmed (C) | - | The presence or lack of ACM is confirmed when the material has been sampled and an asbestos content established through laboratory analysis. In the Asbestos Register at 3.4 this is abbreviated to ‘C’. |
| Strongly Presumed ACM (SP) | - | Accessible ACM is strongly presumed on the basis of material that is visually consistent with confirmed ACM, or is a proprietary material known to be usually asbestos based or is presumed on the basis of similar findings or applications elsewhere (if there is insufficient information to presume the asbestos-type, then it is presumed to be crocidolite. In the Asbestos Register at 3.4 this is abbreviated to ‘SP’. |
| Presumed ACM (P) | - | Where spaces have not been accessed, ACMs are presumed until proven otherwise (i.e. due to no access or similar). In the Asbestos Register at 3.4 this is abbreviated to ‘P’. |
| Suspected ACM (S) | - | ACM is not accessible but is suspected on the basis of similar findings or applications elsewhere, or a proprietary material known to often be asbestos based is suspected of being present. Suspected would normally indicate that although no ACMs can be seen, based on our experience it is possible or likely that they will be present. In the Asbestos Register at 3.4 this is abbreviated to ‘S’. |

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3.3 Product Definitions/Work Classification Guide (WCG)

- LW - **Licensable work** can only be carried out by a HSE licensed asbestos contractor. In the vast majority of cases the asbestos contractor (not the client) will need to give the HSE 14-days' notice prior to commencing works.
- NLW - **Non-licensed work** does not need to be carried out by a HSE licensed contractor, but appropriate controls have to be in place and the work can only be carried out by suitably trained personnel.
- NNLW - **Notifiable non-licensed work** does not need to be carried out by a HSE licensed contractor, but appropriate controls have to be in place and the work can only be carried out by suitably trained personnel. In addition, for notifiable non-licensed work employers also have additional requirements to notify work with asbestos to the relevant enforcing authority, ensure medical examinations are carried out, and maintain registers of work (health records).

3.4 Recommendation definitions in the Material Assessments are as follows:

- Inform - Ensure all personnel who may come into contact with the ACMs are informed of its presence, and also ensure that maintenance contractors etc. are similarly advised.
- Manage - Prevent uncontrolled/unauthorised removal or interference with the ACM, both during normal operations and during foreseeable maintenance. Be aware of the possible presence of similar materials in other spaces. Prevent damage to the material, including precautions to prevent accidental damage. Monitor the condition of the material and update the risk assessment and, if necessary, the remediation recommendation should the condition notably change.
- Restrict - Instigate Permit to Work procedure for any work that will or may interfere with ACM.

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3.5 Asbestos Register

3.5.1 Marble Hill House - Basement						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
No ACMs identified in accessible spaces in the basement						

3.5.2 Marble Hill House - Ground Floor						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
Room 6	Wall panel adjacent to door and understairs cupboard	C	AMA-MHH-01	October 2015	By end of Q4 2016	Latest re-inspection identified no change in condition since last re-inspection. ACM is adequately labelled.
Room 6 - Understairs cupboard	Panels to underside of stairs	C	AMA-MHH-02	October 2015	By end of Q4 2016	Latest re-inspection identified no change in condition since last re-inspection. ACM is adequately labelled.
Stone Stairwell	Panel to rear of door to Stair Hall	C	AMA-MHH-03	October 2015	By end of Q4 2016	Latest re-inspection identified some possible additional wear and tear since last re-inspection. ACM is adequately labelled.
Corridor to rear of shop	Boarding around air vent above plaster ceiling is non-asbestos	C		October 2005	Not required	Non-asbestos material
No other ACMs identified in accessible spaces on the ground floor						

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3.5.3 Marble Hill House - First Floor						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
Stairwell 1	Door lining panel	C	AMA-MHH-04	October 2015	By end of Q4 2016	Latest re-inspection identified some possible additional wear and tear since last re-inspection. ACM is adequately labelled.
Stairwell 1	Door lining panel (door to stairwell 2)	C	AMA-MHH-05	October 2015	By end of Q4 2016	Latest re-inspection identified some possible additional wear and tear since last re-inspection. ACM is adequately labelled.
Stairway 1	Door lining panel (door to Room 1)	C	AMA-MHH-06	October 2015	By end of Q4 2016	Latest re-inspection identified some possible wear and tear since last re-inspection. ACM is adequately labelled.
No other ACMs identified in accessible spaces on the first floor						

3.5.4 Marble Hill House - Second Floor						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
No ACMs identified in accessible spaces on the second floor						

3.5.5 Marble Hill House - Third Floor						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
No ACMs identified in accessible spaces on the third floor						

English Heritage

3.5.6 Marble Hill Grounds - Coach House						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
Ladies/Disabled WC lobby	Panel to underside of stairs in cupboard	SP		October 2015	Not required	Removed by specialist contractors in March 2012 No further action required
Café seating area	Panel to underside of stairs in cupboard	SP		October 2015	Not required	Removed by specialist contractors in March 2012 No further action required
Café seating area	Lining to electrical cupboard	SP		October 2015	Not required	Removed by specialist contractors in April 2007 No further action required
Café seating area	Cable wrap in electrical cupboard	P	AMA-MHH-07	October 2015	Prior to major refurbishment	Suspect wrap is on incoming mains cable. Record and manage presence.
WC	WC cistern	C	AMA-MHH-08	October 2015	By end of Q4 2016	October 2015 re-inspection revealed cistern in good condition, warning label applied during re-inspection
Roof void (Flat 1)	Rope attaching pipe insulation	C		February 2005	Not required	Removed by specialist contractors in February 2005 No further action required
Roof void (Flat 2)	Rope attaching pipe insulation	C	AMA-MHH-09	February 2010	Prior to refurb or when interim access available	October 2015 re-inspection revealed that loft hatch is painted shut, and access is difficult anyway due to location of fridge/freezer
No other ACMs identified in accessible spaces in the Coach House						

English Heritage

3.5.7 Marble Hill Grounds - Beaufort Lodge						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
Outbuildings/sheds	Corrugated roofing sheets	C	AMA-MHH-10	October 2015	By end of Q4 2016	Latest re-inspection identified some cracking and general deterioration of roofing
Rooms 1 & 2	Floor tiles	C		February 2010	Not required	Removed as part of 2004 refurbishment, no further action required
Bathroom/external WC	WC cisterns	C		February 2010	Not required	Removed as part of 2004 refurbishment, no further action required
No other ACMs identified in accessible spaces in Beaufort Lodge						

3.5.8 Marble Hill Grounds - White Lodge						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
Bedroom	Panel blocking off fireplace	C	AMA-MHH-11	October 2015	By end of Q4 2016	Asbestos panel is presumed behind plasterboard facing panel which is in good condition
Living Room	Presumed panel blocking off fireplace (behind non-asbestos facing panel)	P	AMA-MHH-12	October 2015	Prior to refurb or when interim access required	Asbestos panel is presumed behind non-asbestos facing panel which is in good condition
No other ACMs identified in accessible spaces in White Lodge						

English Heritage

3.5.9 Marble Hill Grounds - Disused Public WCs						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
Internal face of outside wall	Rope seal to incinerator	€		February 2010	Not required	Removed by specialist contractors in February 2005 No further action required
Cubicles	WC cisterns	SP	AMA-MHH-13	October 2015	Prior to refurb or if interim access required	Latest re-inspection revealed no change in condition since last inspection
Outside wall (above and below soffit)	Redundant incinerator flue	SP	AMA-MHH-14	October 2015	Prior to refurb or if interim access required	Latest re-inspection revealed no change in condition since last inspection
No other ACMs identified in accessible spaces in the Disused Public WCs						

3.5.10 Marble Hill Grounds - Ice House						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
No ACMs identified in the Ice House						

3.5.11 Marble Hill Grounds - Park Offices/Changing Rooms						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
Toilets	2 x WC cisterns above urinal	SP	AMA-MHH-15	October 2015	Prior to refurb or if interim access required	Latest re-inspection revealed no change in condition since last inspection
No other ACMs identified in accessible spaces in the Park Offices/Changing Rooms						

English Heritage

3.5.12 Marble Hill Grounds - One O'clock Club						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
Store/electrics cupboard in kitchen	Panel lining left-hand side of cupboard	C	AMA-MHH-16	October 2015	By end of Q4 2016	Latest re-inspection revealed no change in condition since last inspection, panel is painted and labelled
No other ACMs identified in accessible spaces in the One O'clock Club						

3.5.13 Marble Hill Grounds - Adventure Playground						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
Store/electrical cupboard in room 2	Panel lining right-hand wall of left-hand cupboard	C	AMA-MHH-17	October 2015	By end of Q4 2016	Latest re-inspection revealed no change in condition since last inspection, panel is painted and labelled
No other ACMs identified in accessible spaces in the Adventure Playground						

3.5.14 Marble Hill Grounds - Changing Block/Stores						
LOCATION	MATERIAL & POSITION	STATUS	MA No.	LAST INSPECTION	NEXT INSPECTION	COMMENT
Space 2a	Asbestos-cement panel on left-hand wall behind heater	C	AMA-MHH-18	October 2015	By end of Q4 2016	Latest re-inspection revealed no change in condition since initial survey, panel is labelled
No other ACMs identified in the Changing Block/Stores						

3.6 Risk Assessment

In response to the findings at Section 3.5 above, a Material Assessment and (for asbestos-containing materials) a Risk Assessment has been carried out. The basis for these assessments is as follows:

3.6.1 GUIDELINES

The Duty to Manage under Regulation 4 of the Control of Asbestos Regulations [CAR] 2012, requires that a written plan be produced, specifying the measures to be taken to control and manage the risk from confirmed and presumed ACMs. Key elements involved in this process are the 'material assessment', and 'priority assessment', which when combined provide useful and structured information on which to base the overall risk assessment, and plan the management process.

The first component part, the 'material assessment', is carried out and recorded on site by the surveyor based on factors prevalent at the time of the survey. The main objective is to assess the potential for fibre release from each ACM confirmed or presumed, thereby identifying the high-risk materials. As the condition of ACM may change following (although not as a result of) the asbestos inspection, it is important to note that this initial material assessment relates specifically to a point in time, i.e. the inspection date.

The second component part, the 'priority assessment', can only be effectively carried out with detailed knowledge of several other factors, for example, the occupancy of the area, the activities carried out in the area, and the likelihood and/or frequency with which maintenance activities are likely to take place. As such, under CAWR it is the duty holder, not the surveyor, who is required to make the assessment, using the information provided in this report, and their knowledge of the premises and the activities carried out within the premises.

3.6.2 BASIS OF MATERIAL ASSESSMENT

In each case where ACM is confirmed, presumed or suspected, four main factors are considered, namely;

- ⇒ Product type;
- ⇒ Extent of damage/deterioration;
- ⇒ Surface treatment;
- ⇒ Type of asbestos.

A 'score' is allocated to each ACM based on factors prevalent at the time of the survey, ranging from 0 to 3 in the case of extent of damage/deterioration and surface treatment, and 1 to 3 for product type and asbestos type. In general terms, 3 = high, 2 = medium, and 1 = low.

This information is set out in the Material Assessment Algorithm at Table 1.

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Table 1 **Material Assessment Algorithm**

SAMPLE VARIABLE	SCORE	EXAMPLES
Product type (or debris from product)	1	Asbestos-reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc).
	2	Asbestos insulating board, mill boards, other low density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt.
	3	Thermal insulation (e.g. pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing.
Extent of damage/deterioration	0	Good condition: no visible damage.
	1	Low damage: a few scratches or surface marks; broken edges on boards, tiles etc.
	2	Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres.
	3	High damage or de-lamination of materials, sprays and thermal insulation. Visible asbestos debris.
Surface treatment	0	Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles.
	1	Enclosed sprays and lagging, AIB (with exposed face painted or encapsulated), asbestos cement sheets etc.
	2	Unsealed AIB, or encapsulated lagging and sprays.
	3	Unsealed lagging and sprays.
Asbestos type	1	Chrysotile.
	2	Amphibole asbestos excluding crocidolite.
	3	Crocidolite.

TOTAL SCORE	POTENTIAL TO RELEASE ASBESTOS FIBRES
10 or more	High
7 - 9	Medium
5 - 6	Low
4 or less	Very low
0 (for non-asbestos materials)	No potential to release asbestos fibres

3.6.3 BASIS OF PRIORITY ASSESSMENT

This element of the assessment has been devised to assess the priority that each element has in terms of overall action. As previously mentioned, the responsibility for conducting this element of the assessment is with the employer of the personnel working upon the site.

It is important to realise that some ACMs may score highly on the 'Priority' assessment, but have a low score on the 'Material' assessment. Conversely, it does not automatically follow that ACMs assigned a high score in the 'Material' assessment will be the materials that should be given priority for any remedial work.

In calculating the priority assessment, other factors need to be taken into account, over and above the initial material assessment, such as:

- ⇒ The extent of the material - the more there is, the greater the potential for fibre release;
- ⇒ The position of the material - even in a low activity area, ACM in a prone position will be more likely to be damaged than similar materials that are effectively out of reach or protected by other means;
- ⇒ The use of the area and activities carried on in the area - ACM in an administrative area will generally be less prone to damage than the same material in (say) a maintenance workshop.
- ⇒ The occupancy of the area - a high level of occupancy in an area where ACM is present increases the potential for disturbance and fibre release
- ⇒ The likelihood and frequency with which maintenance activities are likely to take place.

Four elements are assessed, the first being designed to assess the main activity of the areas occupants and the likely effect that this will have upon the identified materials. The overall risk assessment is calculated by starting with the score from the Material Assessment, then adding in these additional factors.

3.6.3.1 Occupant Activity.

Areas that are rarely used will score 0, whilst areas having high levels of 'traffic' such as corridors will score 3.

3.6.3.2 Likelihood of Disturbance.

In order to determine the score for the 'Likelihood of Disturbance' element of the algorithm the average score for the following elements is calculated, and added to the 'Priority Assessment'.

Three factors are used to assess this element;

Location

Large areas or well ventilated rooms will score low as it is anticipated the material will be less prone to damage and that any resultant fibre dispersal will be rapid. High scoring areas will be locations such as confined spaces where materials are likely to be routinely disturbed, and fibre dispersal will be slow. This variable is scored on a range of 0 to 3.

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Accessibility

Materials in inaccessible locations or materials unlikely to be disturbed generally score low, whereas routinely disturbed materials will score higher by comparison. This variable is scored on a range of 0 to 3.

Extent / Amount

The values of the components of this part of the assessment also range from 0 to 3, with 0 representing small quantities of asbestos, and 3 representing large amounts of asbestos, i.e. in excess of 50 square metres/50 linear metres depending on the material involved.

3.6.3.3 Human Exposure Potential

Three factors are used to form this element of the assessment.

The number of occupants present and the overall time that they spend in an area can affect the overall assessment in terms of the damage that they may produce and also the cumulative risk of the number of people being exposed alongside the period of exposure. The following 3 variables have therefore been identified :-

- ⇒ Number of occupants;
- ⇒ Frequency of use of area;
- ⇒ Average time of use.

In order to determine the score for the 'Human Exposure Potential' element of the algorithm the average score for all of the above elements is calculated, and added to the 'Priority Assessment'.

3.6.3.4 Maintenance Activity.



Two factors are assessed in the determining the relative impact of maintenance activities. These are firstly, the type of activity, which is measured by the level of disturbance that will result from this activity, and is scored on a range of 0 to 3.

Secondly, is the frequency of the identified activity, and again this is scored on a range of 0 to 3.

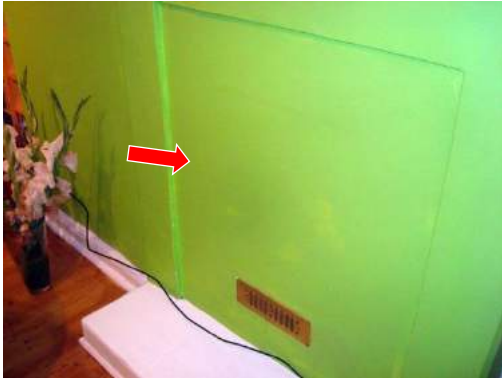
In order to determine the score for the 'Maintenance Activity' element of the algorithm the average score for all of the above elements is calculated, and added to the 'Priority Assessment'.

This information is set out in the Priority Assessment Algorithm at Table 2.



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MATERIAL ASSESSMENT (MA)				
AMA Ref. AMP-MHH-02	FLOOR - SPACE	Main House Ground floor - Room 6 understairs cupboard	SAMPLE No. 93588/15	
DETAIL Insulation board to underside of stairs (behind timber over-cladding)		SAMPLE RESULT	Chrysotile	✓
			Amosite	✓
			Crocidolite	X
			NAD	X
ASSESSMENT		See floor plans for detailed location		
Product	2			
Damage	0			
Surface	0			
Type	2			
AMA SCORE	6			
				
PART 2 - PRIORITY ASSESSMENT (PA)				
Variable	Score	Variable	Score	
Normal occupant activity	1	Human Exposure	1	
Likelihood of disturbance	1	Maintenance activity	1	
Priority Assessment (PA) Score	4	Total Risk Score (AMA + PA)	10	
Management Strategy	Inform, Manage, Restrict			
PART 3 - RE-INSPECTION NOTES				
Re-inspected October 2015, no apparent change in condition since last inspection, full mechanical protection in place, labelled				
Re-inspect by end of Q4 2016 or if maintenance/refurb access required in the meantime				



English Heritage

MATERIAL ASSESSMENT (MA)				
AMA Ref. AMP-MHH-12	FLOOR - SPACE Beaufort Lodge Living room	SAMPLE No. Not accessed		
DETAIL Presumed panel blocking off fireplace (behind non-asbestos facing panel)		SAMPLE RESULT	Chrysotile	N/A
			Amosite	N/A
			Crocidolite	N/A
			NAD	N/A
ASSESSMENT		See floor plans for detailed location		
Product				
Damage				
Surface				
Type				
AMA SCORE				
				
PART 2 - PRIORITY ASSESSMENT (PA)				
Variable	Score	Variable	Score	
Normal occupant activity		Human Exposure		
Likelihood of disturbance		Maintenance activity		
Priority Assessment (PA) Score		Total Risk Score (AMA + PA)		
Management Strategy		Inform, Manage, Restrict		
PART 3 - RE-INSPECTION NOTES				
<p>Re-inspected October 2015, visible panel is non-asbestos but no access has been gained beyond this panel. On the basis of findings elsewhere it is currently presumed that there may be an asbestos panel behind the over-boarding.</p> <p>Re-inspect prior to refurb or if maintenance access required in the meantime</p>				


English Heritage

MATERIAL ASSESSMENT (MA)				
AMA Ref. AMP-MHH-13	FLOOR - SPACE Disused WCs in grounds	SAMPLE No. XA94327/22		
DETAIL WC cisterns in cubicles		SAMPLE RESULT	Chrysotile	X
			Amosite	✓
			Crocidolite	X
			NAD	X
ASSESSMENT		See floor plans for detailed location		
Product	1			
Damage	0			
Surface	0			
Type	2			
AMA SCORE	3			
				
PART 2 - PRIORITY ASSESSMENT (PA)				
Variable	Score	Variable	Score	
Normal occupant activity	0	Human Exposure	1	
Likelihood of disturbance	1	Maintenance activity	0	
Priority Assessment (PA) Score	2	Total Risk Score (AMA + PA)	5	
Management Strategy	Inform, Manage, Restrict			
PART 3 - RE-INSPECTION NOTES				
<p>Re-inspected October 2015, no change in condition since last inspection, WCs are not used except for some storage so no on-going maintenance requirement</p> <p>Re-inspect prior to refurbishment or if maintenance access required in the meantime</p>				

English Heritage

MATERIAL ASSESSMENT (MA)			
AMA Ref. AMP-MHH-14	FLOOR - SPACE Disused WCs in grounds	SAMPLE No. Visual ID	
DETAIL Redundant incinerator flue on outside wall		SAMPLE RESULT (Presumed)	Chrysotile ✓
			Amosite X
			Crocidolite ✓
			NAD X
ASSESSMENT		See floor plans for detailed location	
Product	1		
Damage	1		
Surface	1		
Type	3		
AMA SCORE	6		
			
PART 2 - PRIORITY ASSESSMENT (PA)			
Variable	Score	Variable	Score
Normal occupant activity	0	Human Exposure	0
Likelihood of disturbance	1	Maintenance activity	0
Priority Assessment (PA) Score	1	Total Risk Score (AMA + PA)	7
Management Strategy	Inform, Manage, Restrict		
PART 3 - RE-INSPECTION NOTES			
Re-inspected October 2015, no change in condition since last inspection			
Re-inspect by end of Q4 2016 or if maintenance/refurb access required in the meantime			

English Heritage

MATERIAL ASSESSMENT (MA)				
AMA Ref. AMP-MHH-16	FLOOR - SPACE One O'clock Club Kitchen	SAMPLE No. XA94330/25		
DETAIL Store/electrics cupboard - Panel lining left-hand side of cupboard		SAMPLE RESULT	Chrysotile	X
			Amosite	✓
			Crocidolite	X
			NAD	X
ASSESSMENT		See floor plans for detailed location		
Product	2			
Damage	1			
Surface	1			
Type	2			
AMA SCORE	6			
				
PART 2 - PRIORITY ASSESSMENT (PA)				
Variable	Score	Variable	Score	
Normal occupant activity	1	Human Exposure	1	
Likelihood of disturbance	2	Maintenance activity	1	
Priority Assessment (PA) Score	5	Total Risk Score (AMA + PA)	11	
Management Strategy	Inform, Manage, Restrict			
PART 3 - RE-INSPECTION NOTES				
<p>Re-inspected October 2015, panel is painted and labelled, no change in condition since last inspection. (Door lining panels are non-asbestos material.)</p> <p>Re-inspect by end of Q4 2016 or if maintenance/refurb access required in the meantime</p>				

4 PERMIT TO WORK SYSTEM

4.1 Permit to Work Procedure

The objective of this system is to ensure that, prior to commencing any works, due account has been taken of any ACMs that might be present, and therefore could be damaged as a result of the works.

By being aware of any ACMs present, works can be carefully planned to avoid any accidental damage to or any uncontrolled removal of ACMs to protect;

- those who work on the fabric of the properties (electricians, plumbers, etc.) and
- those who work or live in the properties (e.g. English Heritage personnel, tenants, occupants, etc.) who may come into close contact with or work near ACMs.

Regular maintenance personnel and contractors, as listed in Section 1.5 of this Plan, do not need to be issued with a Permit on every job. Instead, they will be given a copy of the relevant sections of this Plan, which they must acknowledge and refer to prior to commencing any work. Depending on the extent and nature of the works, the Estates Team may, at their discretion, still require a Permit to Work to be issued.

Non-regular contractors, i.e. for one-off contracts or emergency call-outs, will be required to refer to this Plan **prior** to commencing **any** works, and, depending on the nature of the works, a Permit to Work may be issued by the Estates Team, or in their absence (**although only in an emergency**), via the Help Desk.

In general terms, the closer the work operation is to ACMs, the greater the likelihood of ACMs being disturbed. If there is a likelihood that ACMs could be accidentally damaged or otherwise interfered with, e.g. ladders leant against insulated pipes, tools dropped onto ACMs, working very close to ACMs, etc., then a Permit to Work would generally be issued.

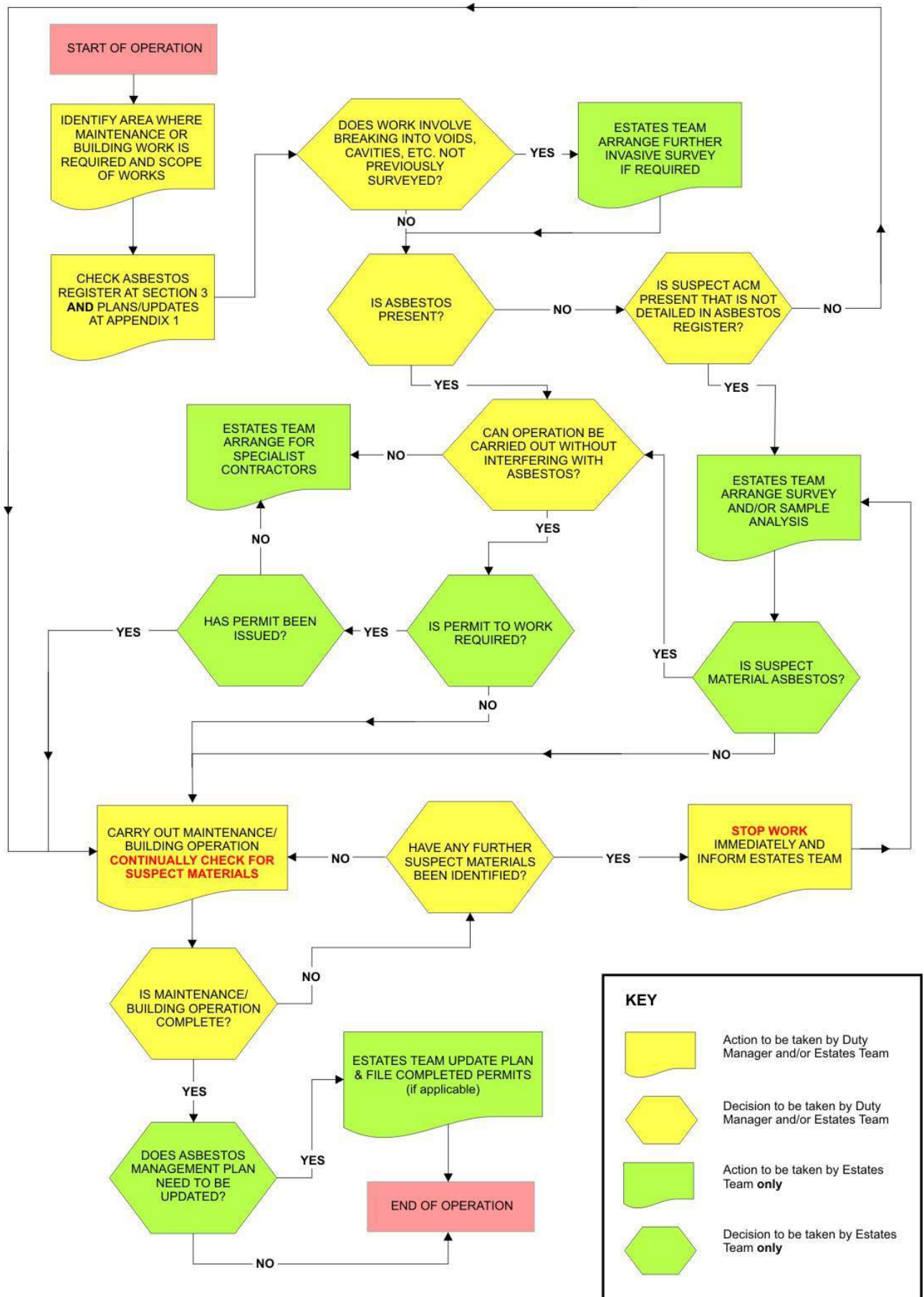
The decision matrix and accompanying notes at Section 4.3 below provides further information on this aspect.

An example of a completed permit is given at Section 4.4 of this Plan, and by utilising the form in conjunction with the Asbestos Location details at Section 3, the drawings and latest updates at Appendix 1a, and the flowchart at Section 4.2, the form is simple to complete.

4.2 Pre-maintenance/building Flowchart

The chart on the following page describes the process that needs to be followed by all contractors prior to any work commencing. Where necessary, this will include the Estates Team issuing a Permit to Work. In addition, depending on the nature of work to be carried out coupled with the extent of the existing asbestos survey, a further invasive survey may be instigated by the Estates Team. If additional surveying is required, this should be completed well in advance of the proposed works so that any further ACMs can be safely dealt with first.

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KEY

- Action to be taken by Duty Manager and/or Estates Team
- Decision to be taken by Duty Manager and/or Estates Team
- Action to be taken by Estates Team **only**
- Decision to be taken by Estates Team **only**

English Heritage

4.3 Permit to Work Decision Matrix

To establish whether a Permit to Work is required, various elements need to be taken into account.

The Decision Matrix on the following page summarises the responses to the issues raised, but in establishing those responses the Estates Team should consider the following:

LIKELIHOOD OF FIBRE RELEASE (HORIZONTALS)

The likelihood is in some respects determined to some degree by the type of ACM present. For example, composite or reinforced materials are usually stronger and less likely to be affected by impact. More fibrous ACMs such as AIB or thermal insulation are normally softer, and therefore more prone to impact damage.

When considering the likelihood of fibre release, other elements need to be considered, e.g.

- ⇒ The type, nature and complexity of the work being carried out;
- ⇒ The tools and equipment being used;
- ⇒ The location of the work, i.e. confined spaces vs external;
- ⇒ The position of the ACMs within the work site;
- ⇒ Type and condition of existing protection to ACMs;
- ⇒ The experience and standing of the contractor;
- ⇒ The adequacy of the contractor's method statement and procedures in respect of asbestos issues;

RESULT OF FIBRE RELEASE (VERTICALS)

The result of a fibre release will be dictated in most instances by the type and friability of the ACMs present. For example, composite materials such as floor tiles or roofing sheets will result in a significantly lower fibre release if disturbed than more fibrous products such as asbestos insulation board [AIB].

In turn AIB will generally result in a lower release of fibres than would thermal insulation.

However, when considering the result of fibre release, it is not only the QUANTITY of fibres being released that needs to be considered, but also the EFFECT of that release, e.g.

- ⇒ Human exposure and potential health risks associated with that exposure;
- ⇒ Extent of release, i.e. how much of an area or property would be affected;
- ⇒ Damage to assets - some surfaces or materials can be very difficult to decontaminate in the event of a fibre release, and may need to be disposed of;
- ⇒ Cost - the cost of decontamination can run into hundreds of thousands of pounds, and is compounded by the fact that parts of the property may need to be closed, staff or occupants may need to be relocated, etc.;
- ⇒ Reputation - what would be the effect on English Heritage's reputation in the event of any of the above.

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Once the LIKELIHOOD and RESULT of fibre release have been established, those responses should be compared to the matrix below as a guide to determining whether to issue a Permit to Work.

If there is any degree of doubt, or if there is insufficient information on which to reasonably assess the likelihood or result, then a Permit to Work should be issued.

RESULT OF FIBRE RELEASE	LIKELIHOOD OF FIBRE RELEASE				
	1. Minor cosmetic works distant from ACMs	2. Minor cosmetic works on or close to ACMs	3. Other building works distant from ACMs	4. Other building works close to ACMs	5. Building works in confined space, or very close to ACMs
1. Release will be very low	1	2	3	4	5
2. Release will be minor	2	4	6	8	10
3. Release will be significant	3	6	9	12	15
4. Release will be substantial	4	8	12	16	20
5. Release will be very high	5	10	15	20	25

RISK RATING	LIKELIHOOD OF PERMIT BEING REQUIRED
1 - 2 - 3 - 4	Unless other factors are subsequently introduced, no Permit to Work required
5 - 6 - 8 - 9	Other factors need to be considered to decide whether permit is not required
10 - 12 - 15 - 16 - 20 - 25	Permit to Work WILL be required

English Heritage

4.4 Example Permit to Work Form

ENGLISH HERITAGE - ASBESTOS MANAGEMENT - PERMIT TO WORK			
PERMIT NO.	2014/01	ISSUE DATE	11 March 2014
PROPERTY	Kenwood House	BUILDING	Main House
COMPANY NAME	PPS Cabling	COMPANY REPRESENTATIVE	Suzy Jarvis
PRECISE PROPOSED LOCATION(S) OF WORK Basement undercrofts spaces 6 & 7			
DESCRIPTION OF WORKS New cable route through undercroft to connect into existing JB on end wall			
NUMBER OF PERSONNEL CARRYING OUT WORKS 2			
ESTIMATED DURATION OF WORKS	2 days	START DATE	12 March '14
		FINISH DATE	13 March '14
IS ASBESTOS CONFIRMED, ASSUMED, OR SUSPECTED IN THE SPACE(S) CONCERNED?			YES <input type="radio"/> NO <input checked="" type="radio"/>
Details (if 'YES') Boarding between joists, possible debris beneath floor covering			
DOES CONTRACTOR'S METHOD STATEMENT ADEQUATELY ADDRESS ASBESTOS ISSUES & PRECAUTIONS?			YES <input type="radio"/> NO <input checked="" type="radio"/>
IF NO, LIST PRECAUTIONS TO BE TAKEN TO ENSURE THAT ACM IS NOT INTERFERED WITH IN ANY WAY Operatives to be informed of presence of asbestos boarding Care required when fixing conduit to avoid hitting boarding All waste/unused materials to be removed on completion Care required to avoid damage to floor protection			
ARE SPECIALIST ASBESTOS REMOVAL/TREATMENT SERVICES REQUIRED?			YES <input type="radio"/> NO <input checked="" type="radio"/>
If 'No', work can proceed. If 'Yes', this Permit cannot be issued. Estates Team to either re-plan job and/or arrange for specialist asbestos contractor services.			
SIGNED FOR CONTRACTOR	Suzy Jarvis	SIGNED FOR ENGLISH HERITAGE	S. States
PRINT NAME	S. JARVIS	PRINT NAME	S. STATES
HAVE ANY FURTHER SUSPECT MATERIALS BEEN DETECTED AS A RESULT OF THESE WORKS?			YES <input type="radio"/> NO <input checked="" type="radio"/>
Details (if 'YES')			
HAS ESTATES TEAM BEEN INFORMED?			DATE N/A
HAVE ANY ASBESTOS MATERIALS BEEN DAMAGED AS A RESULT OF THESE WORKS?			YES <input type="radio"/> NO <input checked="" type="radio"/>
Details (if 'YES')			
HAS ESTATES TEAM BEEN INFORMED?			DATE N/A
(Estates Team use only)			
DOES MANAGEMENT PLAN REQUIRE REVISING/UPDATING?			YES <input type="radio"/> NO <input checked="" type="radio"/>
MANAGEMENT PLAN UPDATED	BY N/A	DATE	N/A
NEW MANAGEMENT PLAN ISSUED	BY N/A	DATE	N/A

4.5 Action to be taken on identifying suspect material

If, during the course of regular maintenance or other invasive building works a material is identified that cannot be immediately identified visually as non-asbestos, it should be presumed to be suspect ACM until proven otherwise.

The Duty Manager and/or Estates Team are to be informed immediately of the findings, and all work in the vicinity that has or may disturb the material will cease. In the event that suspect ACM has been damaged, all work will cease and all personnel are to leave the area and close the door behind them.

The material will be examined by a suitably competent person at the earliest opportunity, with bulk sampling if necessary for subsequent laboratory analysis. Only on confirmation that the material is non-asbestos can works recommence and/or the area be reoccupied.

If the material is found to be ACM, then the Estates Team will arrange the necessary remediation.

4.6 Emergency action in the event of accidental damage to ACMs

In the event of an emergency, the Duty Manager, out-of-hours Duty Manager, or Regional Duty Manager should be contacted as per the duty rota and contact number list held in the Control Room. If any of the above cannot be contacted you should contact the Estates Team.

In view of the many different scenarios surrounding accidental spillage/damage to confirmed, presumed or suspected ACMs, the emergency response requirement can differ in each situation.

As such, in the event of damage or spillage, the Estates Team will obtain further advice and guidance from the Help Desk if necessary.

4.7 Help Desk (Emergencies Only)

If out-of-hours emergency works are required to be carried out and the Estates Team are not available, whenever possible the works should be delayed until their return. If this is not possible, then the matter should be passed over to the Help Desk for further assistance, including authorising the issue of a Permit to Work if warranted.

The Help Desk contact numbers are:

Office:	-	0333 700 7898
Mobile:	-	0777 570 7898
E-mail:	-	info@prosol.uk.com

5 MANAGEMENT REVIEW

5.1 Monitoring of ACMs In-situ

Regular monitoring of ACMs in-situ will be carried out by the Estates Team. This is achieved in the first instance by regular visits to the site by the Estates Team, and is augmented by formal re-inspections generally on a 12 to 18 month basis, for the higher risk ACMs, and 12 to 24 months for the lower risk ACMs. In each case the recommended next inspection date will be based on the risk in each case, rather than an arbitrary date in the future. If any high risks are identified that cannot be removed or otherwise made safe within a reasonable timeframe, the re-inspection frequency could be reduced significantly, depending on the nature of the material and level of perceived risk.

If, however, the usage of a space changes, or if for any other reason it is considered that the original Risk Assessment may no longer apply (for example if in-situ ACMs are found to be damaged, or if further ACMs are identified), the monitoring schedule may be amended accordingly.

Monitoring will consist primarily of examining accessible ACMs to check on their condition, note any damage since the last check, review the adequacy of protection, etc. Such monitoring will be augmented on a day-to-day basis by personnel, contractors, occupants and tenants making the Dutyholder aware of any changes to material thought to be ACM, any debris, and any proposed change of use of a space.

5.2 ACM Inspection Record

The formal record of inspections of in-situ ACMs is included in the Asbestos Register at section 3.5 and/or the Material Assessment at section 3.7, and is updated when the Plan is re-issued. Ad-hoc inspections or other relevant information can be recorded by the Estates Team in the table at Appendix 1a.

5.3 Review of the Asbestos Management Plan

The Asbestos Management Plan will be reviewed in line with the re-inspections of ACMs to ensure that it remains effective. This does not necessarily mean that any changes are necessary, but rather that current provisions are appraised, any feedback from personnel who look after the Plan on a day-to-day basis is received and reviewed, and any changes that could improve the usefulness, efficiency or general user-friendliness of the Plan are discussed and implemented where necessary. This review will include some or all of the following items depending on the nature of the site, the nature and extent of ACMs in-situ, and feedback from the Duty Manager and/or site personnel:

- Changes to condition of ACMs in-situ
- Permit to Work system
- Staff awareness and training
- Future re-inspections and Plan review
- Any other asbestos issues

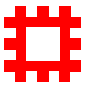
5.4 Updating the Asbestos Management Plan

Minor updates and ad-hoc revisions can be recorded in the table at Appendix 1a and (if required) on the individual drawings at Appendix 1b, including hand-written annotations. Formal updating and reissue of the Plan will be undertaken by the Estates Team and will depend on the number and type of annotations made, or the extent of any revision to the Plan provisions. Drawings will be formally updated and re-issued with the formal update of the Plan, or on an ad-hoc basis if the extent of interim revisions warrant a re-issue.

Revisions identified during the re-inspection process and review of the Asbestos Management Plan will be detailed in Section 0 of this document (Formal Revision Record).




APPENDIX 1b - SITE PLANS SHOWING ACM LOCATIONS

PROPERTY/ADDRESS	DRAWING REF.
MARBLE HILL HOUSE, TWICKENHAM	
Main House - Basement	AMP-MHH-1015-B
Main House - Ground Floor	AMP-MHH-1015-G
Main House - First Floor	AMP-MHH-1015-1
Main House - Second Floor	AMP-MHH-1015-2
Main House - Third Floor	AMP-MHH-1015-3
Coach House - Ground Floor	AMP-MHH-1015-CHG
Coach House - First Floor	AMP-MHH-1015-CH1
Beaufort Lodge	AMP-MHH-1015-BL
White Lodge	AMP-MHH-1015-WL
Disused Ladies Public Toilets & Ice House	AMP-MHH-1015-OPT
Park Offices/Changing Rooms	AMP-MHH-1015-POCR
Adventure Playground & One O'clock Club	AMP-MHH-1015-AP
Changing Block/Stores	AMP-MHH-1015-CB



ENGLISH HERITAGE

LEGEND

-  Spaces containing ACMs
-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT
ENGLISH HERITAGE

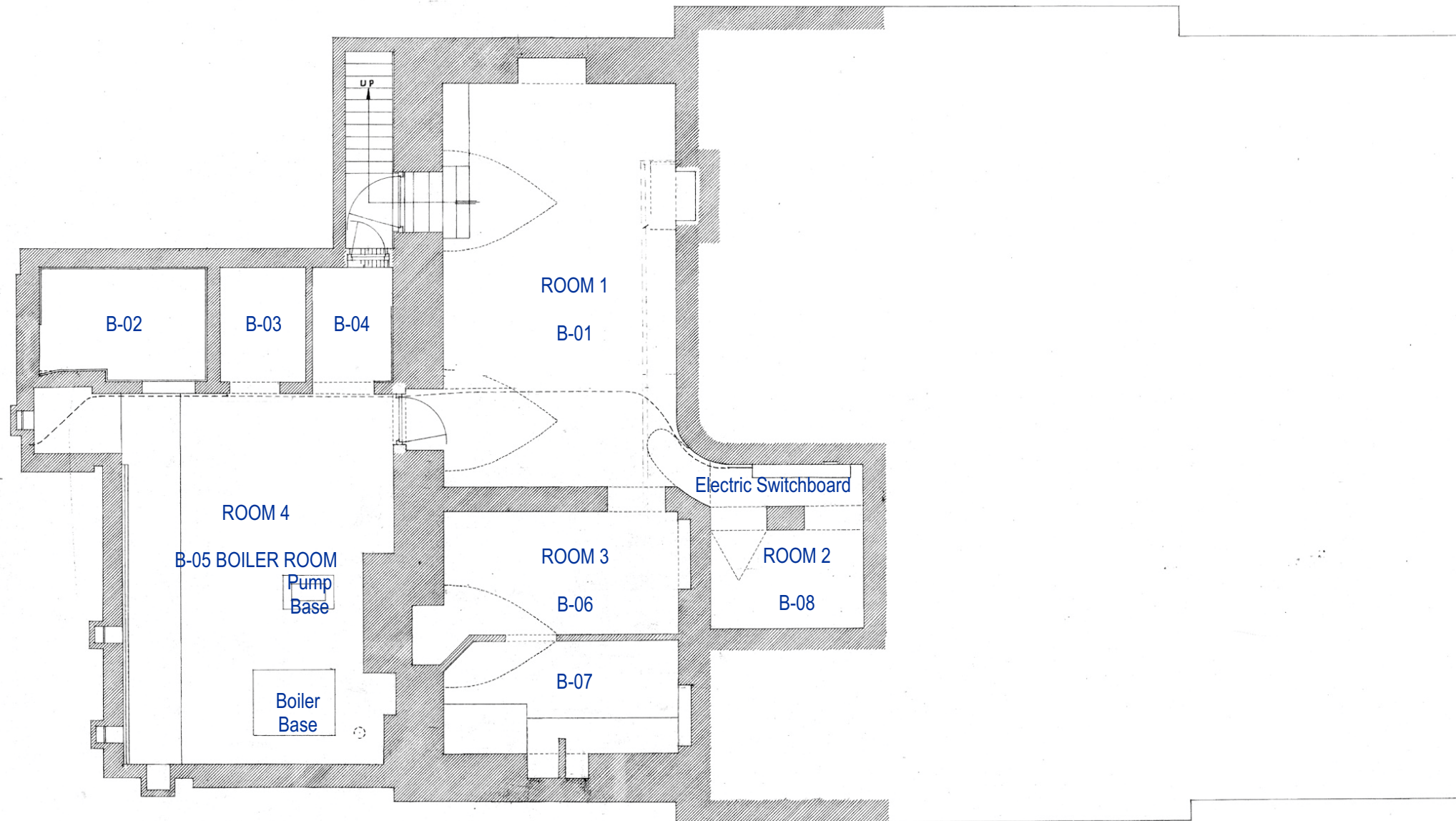
PROJECT
ASBESTOS MANAGEMENT PLAN
MARBLE HILL HOUSE

DRAWING
MARBLE HILL HOUSE
MAIN HOUSE - BASEMENT

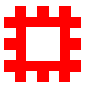
DATE OCTOBER 2015	SCALE NOT TO SCALE
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DRG No.
AMP-MHH-1015-B

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 m: +44 (0)777 570 7898
 e: mail@prosol.uk.com
 w: www.prosol.uk.com




NO ASBESTOS CONTAINING MATERIALS IDENTIFIED ON THIS FLOOR



ENGLISH HERITAGE

LEGEND

-  Spaces containing ACMs
-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT

ENGLISH HERITAGE

PROJECT

ASBESTOS MANAGEMENT PLAN
MARBLE HILL HOUSE

DRAWING

MARBLE HILL HOUSE
MAIN HOUSE - GROUND FLOOR

DATE

OCTOBER 2015

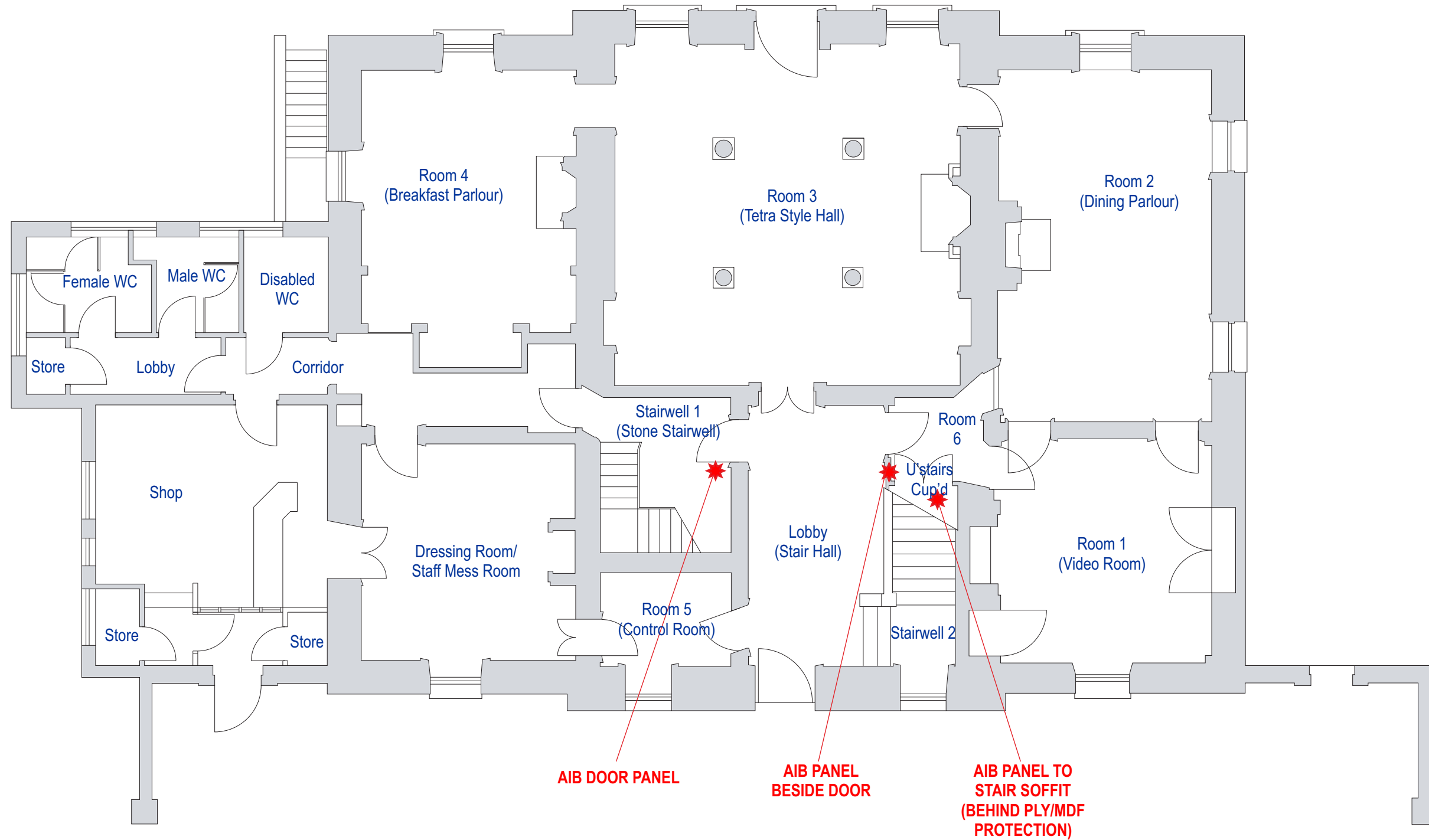
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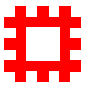
NOT TO SCALE

DRG No.

AMP-MHH-1015-G




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ENGLISH HERITAGE

LEGEND

-  Spaces containing ACMs
-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT

ENGLISH HERITAGE

PROJECT

ASBESTOS MANAGEMENT PLAN
MARBLE HILL HOUSE

DRAWING

MARBLE HILL HOUSE
MAIN HOUSE - FIRST FLOOR

DATE

OCTOBER 2015

SCALE

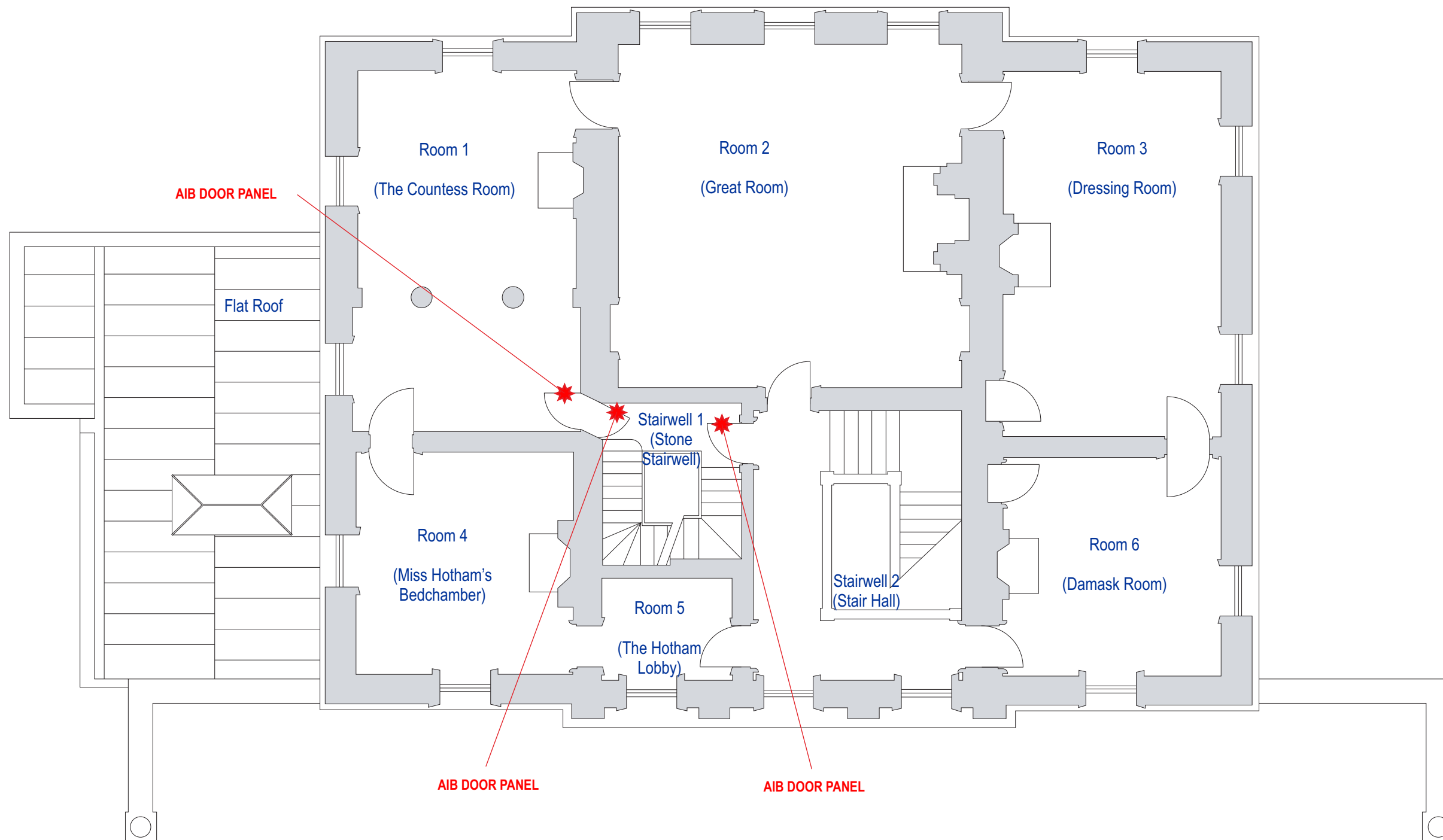
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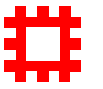
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AMP-MHH-1015-1

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ENGLISH HERITAGE

LEGEND

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-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT
ENGLISH HERITAGE

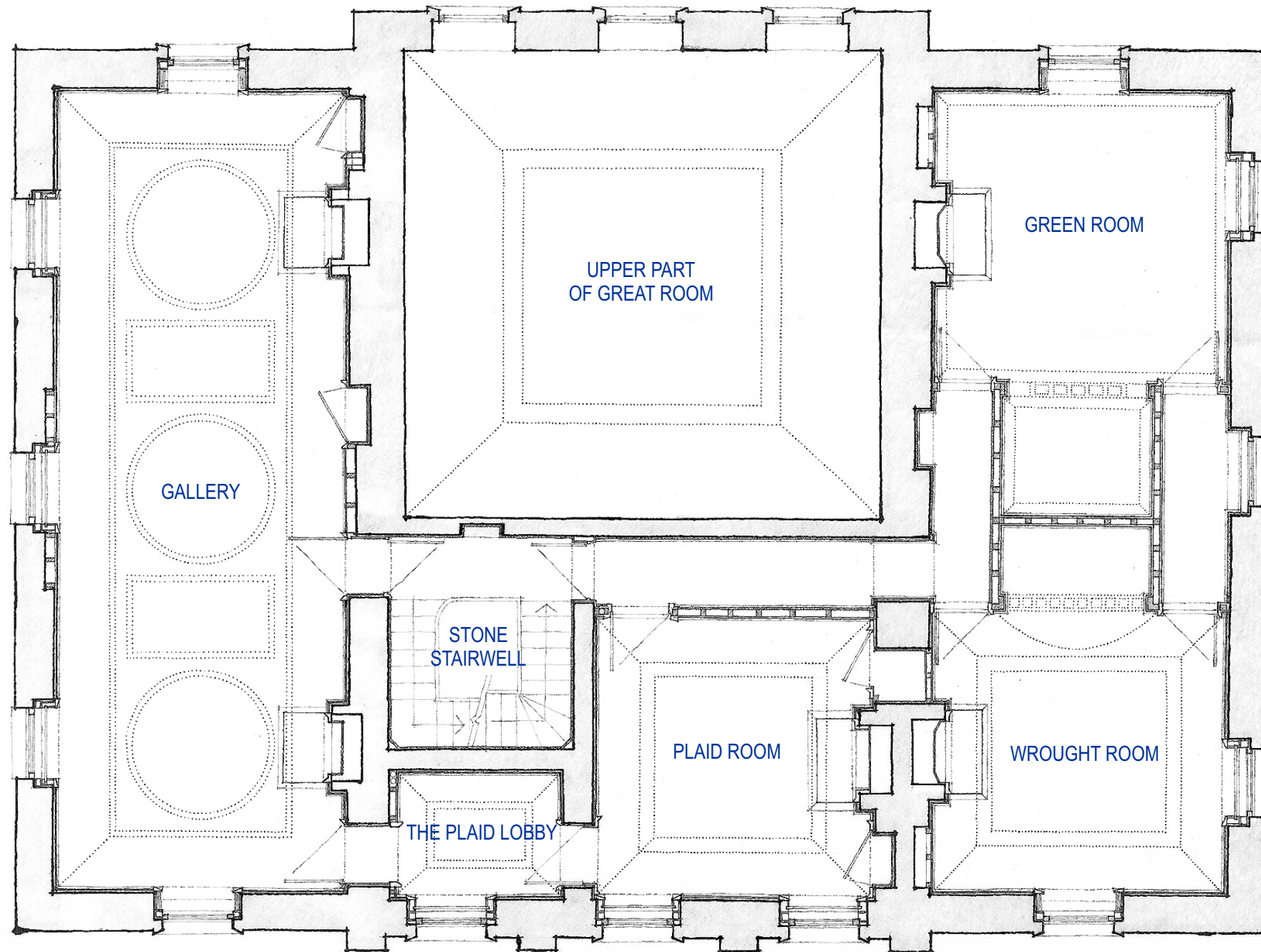
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ASBESTOS MANAGEMENT PLAN
MARBLE HILL HOUSE

DRAWING
MARBLE HILL HOUSE
MAIN HOUSE - SECOND FLOOR

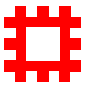
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DRG No.
AMP-MHH-1015-2

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 w: www.prosol.uk.com






NO ASBESTOS CONTAINING MATERIALS IDENTIFIED ON THIS FLOOR



ENGLISH HERITAGE

LEGEND

-  Spaces containing ACMs
-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT
ENGLISH HERITAGE

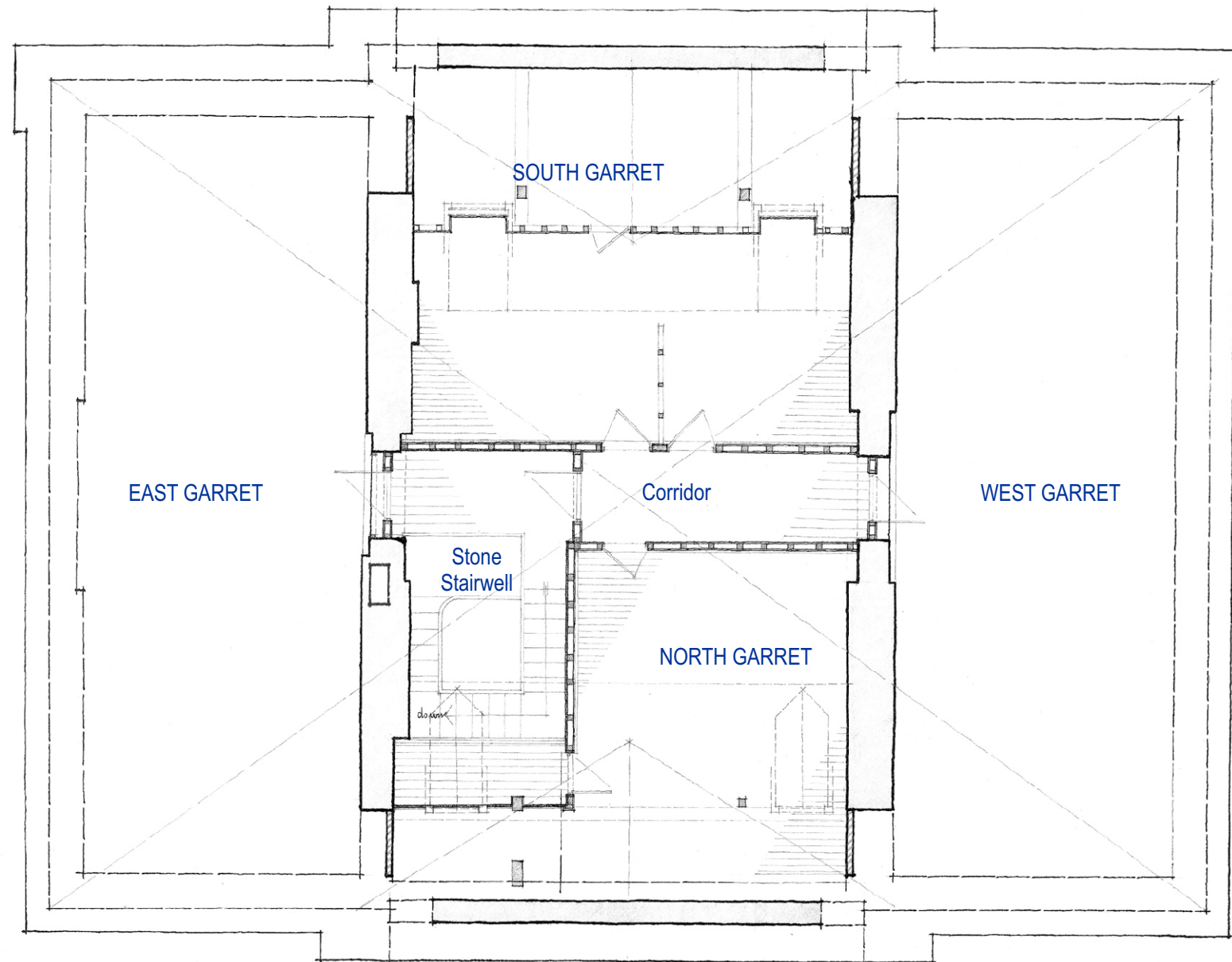
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MARBLE HILL HOUSE

DRAWING
MARBLE HILL HOUSE
MAIN HOUSE - THIRD FLOOR

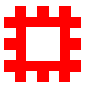
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DRG No.
AMP-MHH-1015-3

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NO ASBESTOS CONTAINING MATERIALS IDENTIFIED ON THIS FLOOR



ENGLISH HERITAGE

LEGEND

-  Spaces containing ACMs
-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT

ENGLISH HERITAGE

PROJECT

ASBESTOS MANAGEMENT PLAN
MARBLE HILL HOUSE

DRAWING

MARBLE HILL GROUNDS
COACH HOUSE - GROUND FLOOR

DATE

OCTOBER 2015

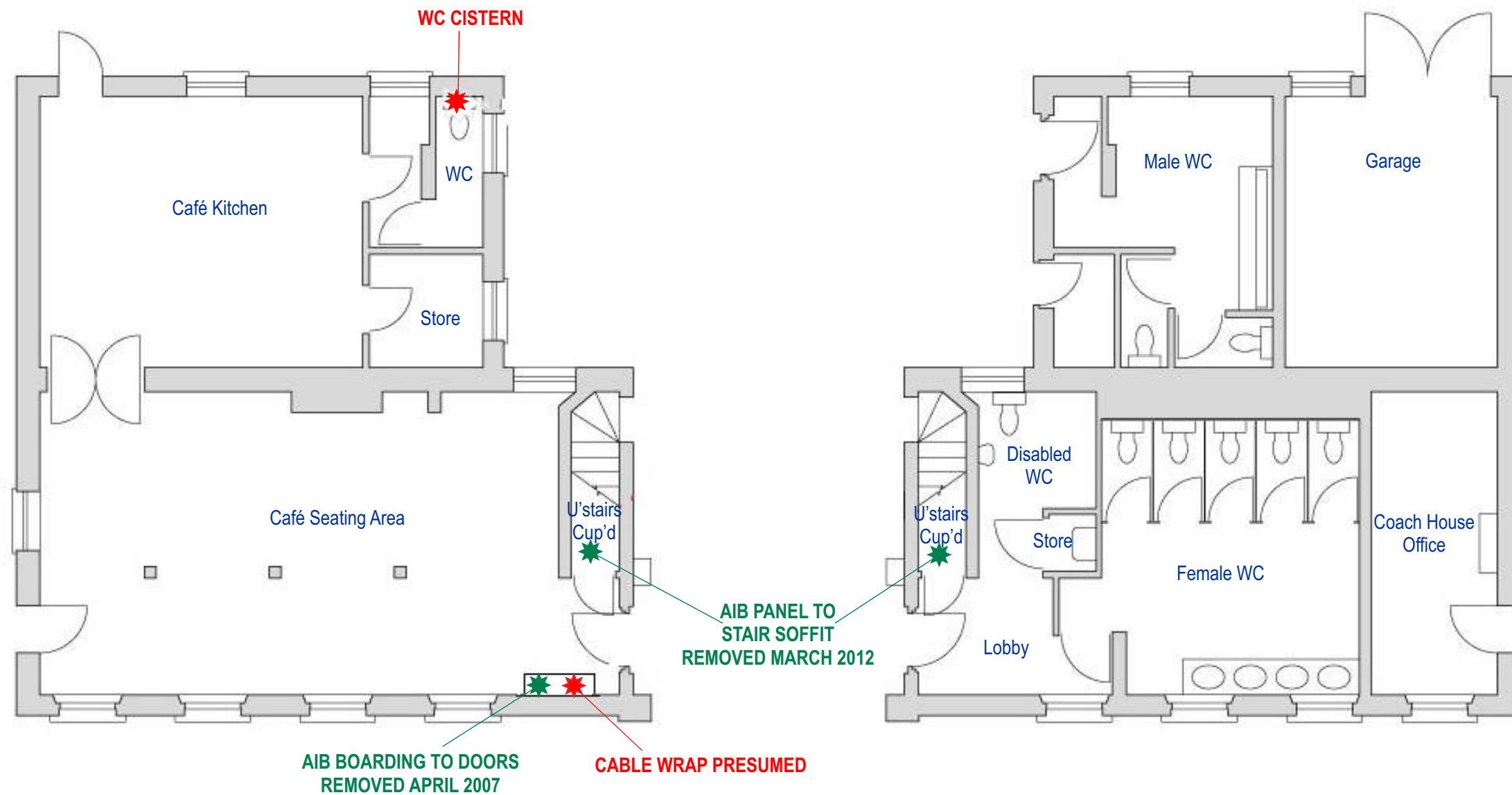
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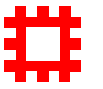
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DRG No.

AMP-MHH-1015-CHG



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 w: www.prosol.uk.com





ENGLISH HERITAGE

LEGEND

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-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT
ENGLISH HERITAGE

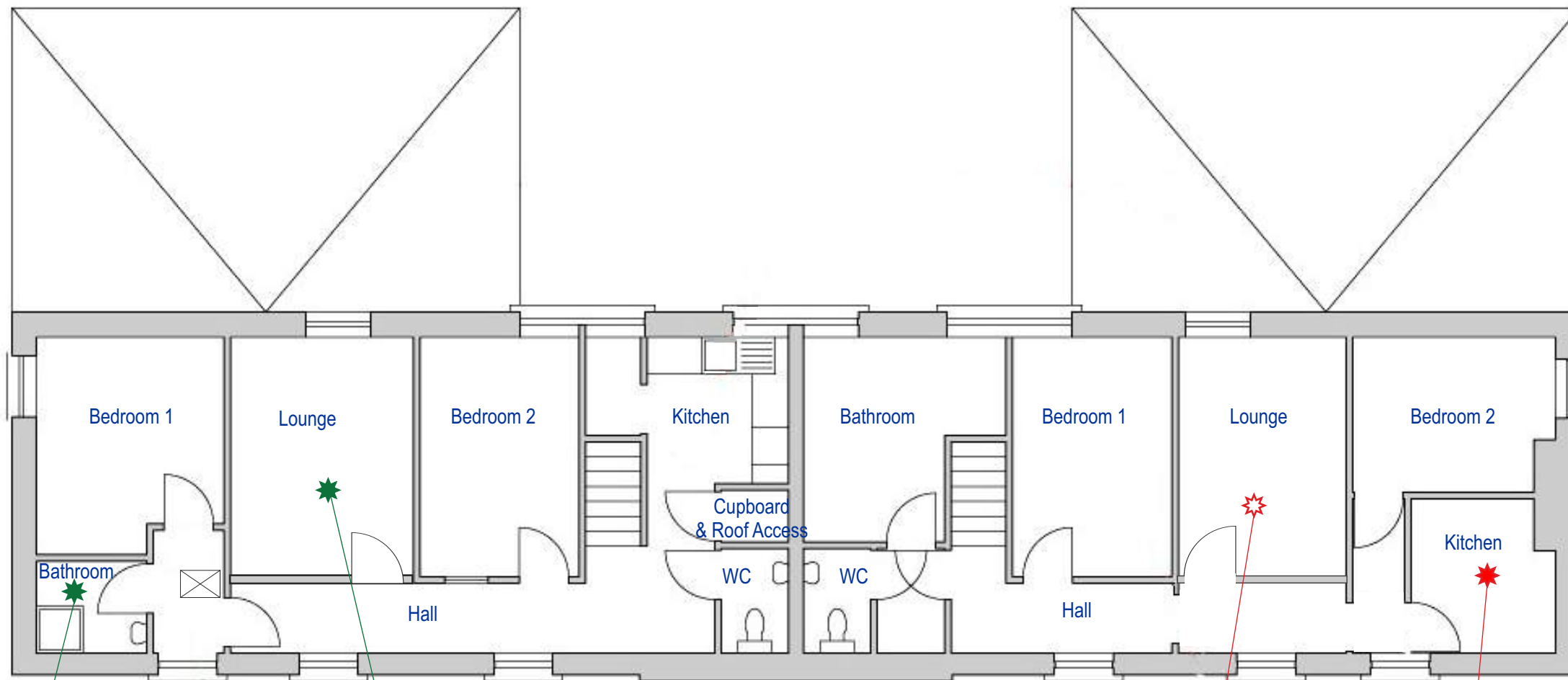
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ASBESTOS MANAGEMENT PLAN
MARBLE HILL HOUSE

DRAWING
MARBLE HILL GROUNDS
COACH HOUSE - FIRST FLOOR

DATE OCTOBER 2015	SCALE NOT TO SCALE
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AMP-MHH-1015-CH1

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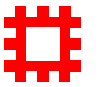
ASBESTOS STRING ON
INSULATION IN ROOF VOID
REMOVED (2004)

ASBESTOS STRING ON
INSULATION IN ROOF VOID
REMOVED (2004)

FLAT 1 FLAT 2



ASBESTOS STRING PRESUMED ON
INSULATION IN ROOF VOID
(SPACE NOT YET ACCESSED)

ASBESTOS STRING ON
INSULATION IN ROOF VOID



ENGLISH HERITAGE

LEGEND

-  Spaces containing ACMs
-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT
ENGLISH HERITAGE

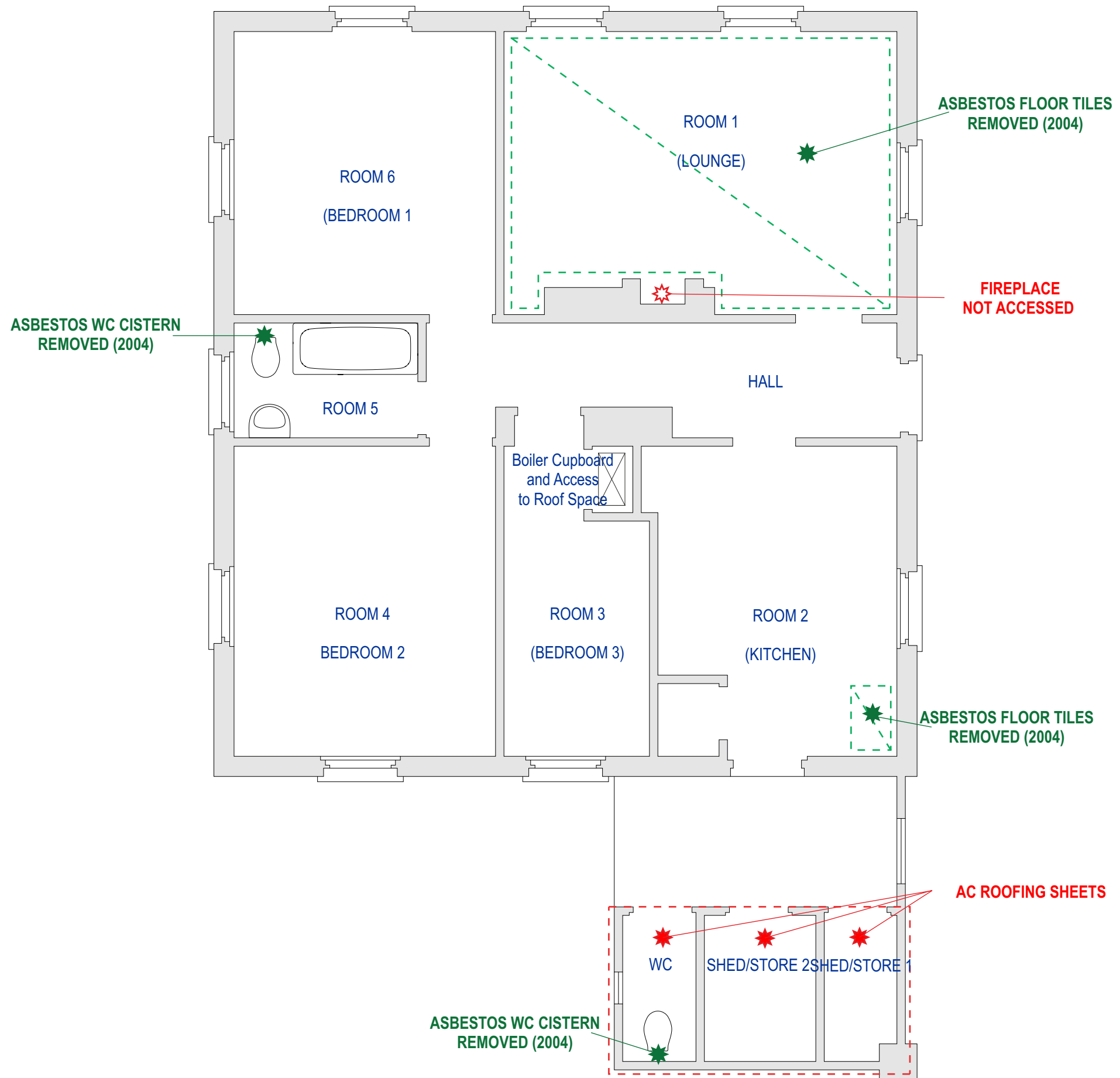
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MARBLE HILL HOUSE

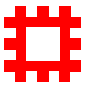
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MARBLE HILL GROUNDS
BEAUFORT LODGE

DATE OCTOBER 2015	SCALE NOT TO SCALE
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DRG No.
AMP-MHH-1015-BL




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ENGLISH HERITAGE

LEGEND

-  Spaces containing ACMs
-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT

ENGLISH HERITAGE

PROJECT

ASBESTOS MANAGEMENT PLAN
MARBLE HILL HOUSE

DRAWING

MARBLE HILL GROUNDS
WHITE LODGE

DATE

OCTOBER 2015

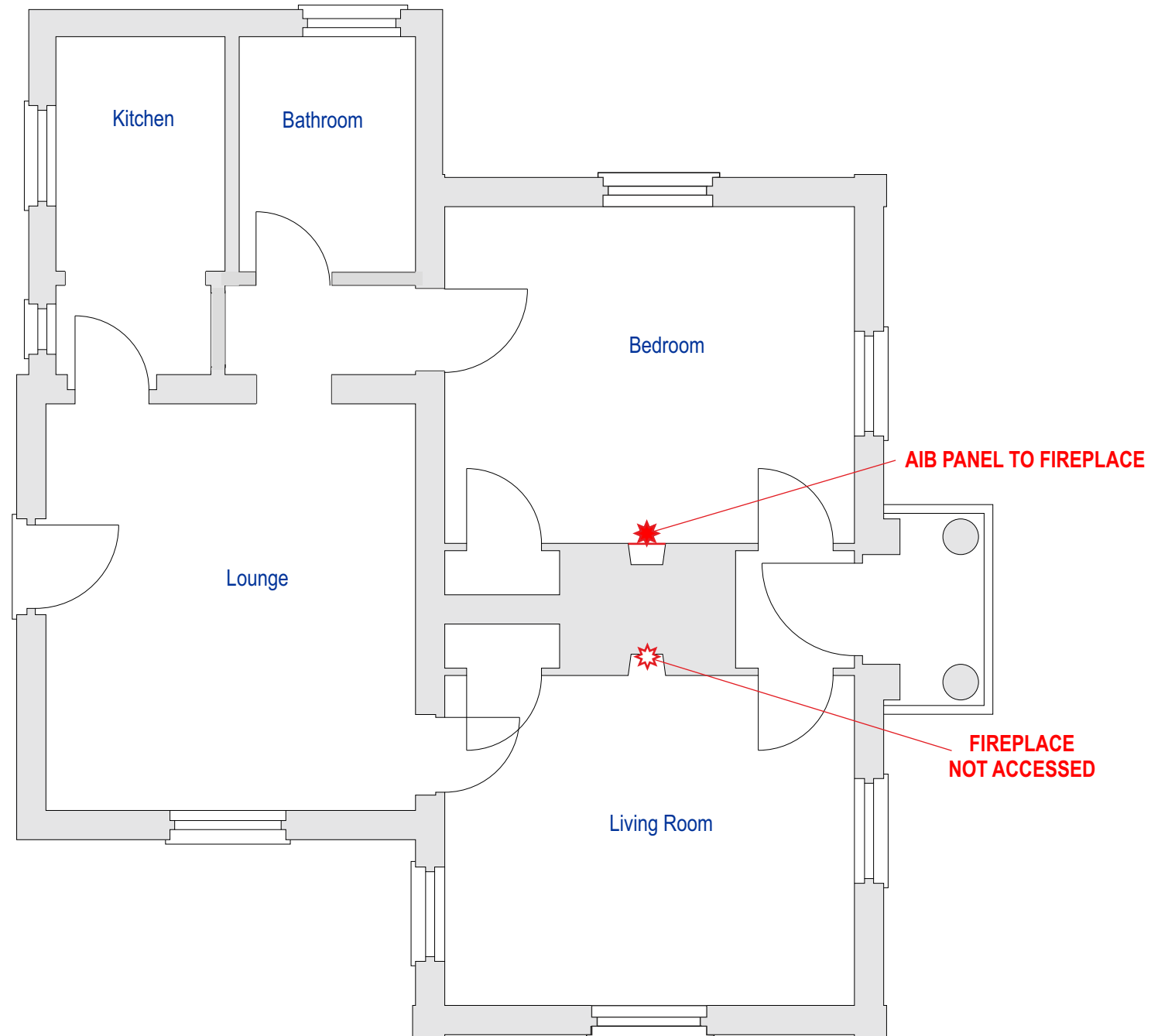
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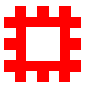
NOT TO SCALE

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AMP-MHH-1015-WL




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ENGLISH HERITAGE

LEGEND

-  Spaces containing ACMs
-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT
ENGLISH HERITAGE

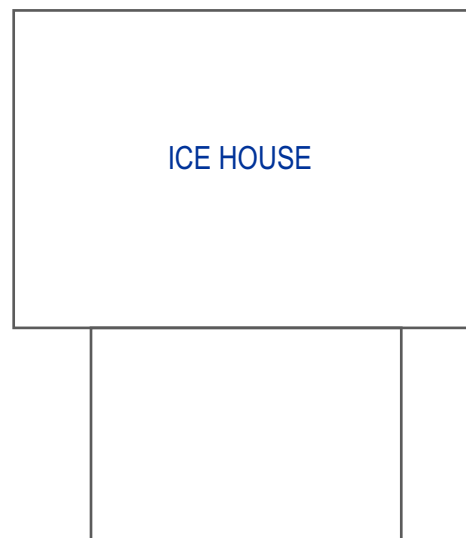
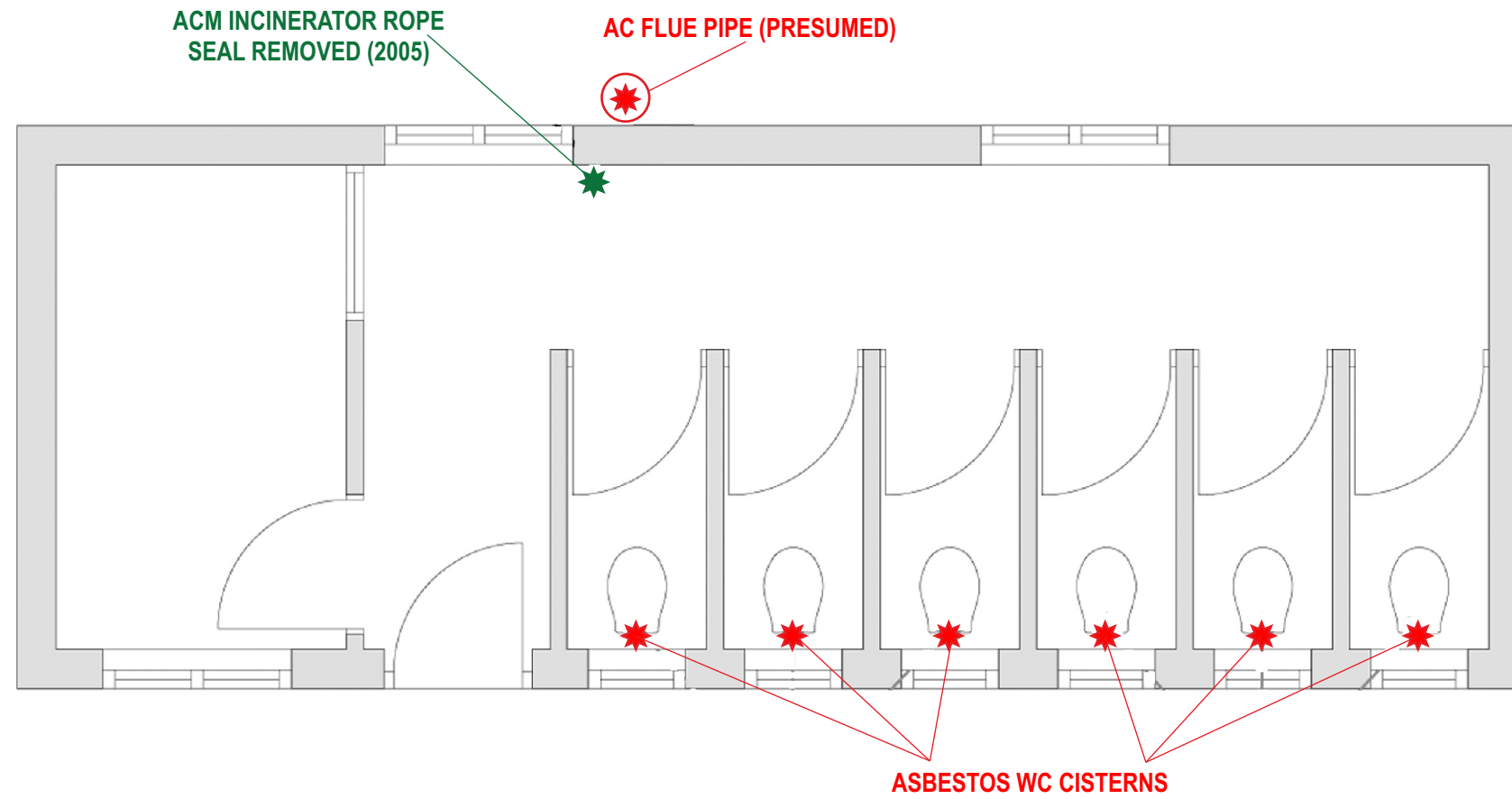
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ASBESTOS MANAGEMENT PLAN
MARBLE HILL HOUSE

DRAWING
MARBLE HILL GROUNDS
DISUSED WCs & ICE HOUSE

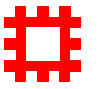
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 RG31 5QE
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 w: www.prosol.uk.com






NO SUSPECT MATERIALS
IDENTIFIED IN THE ICE HOUSE



ENGLISH HERITAGE

LEGEND

-  Spaces containing ACMs
-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT

ENGLISH HERITAGE

PROJECT

ASBESTOS MANAGEMENT PLAN
MARBLE HILL HOUSE

DRAWING

MARBLE HILL GROUNDS
ADVENTURE PLAYGROUND &
ONE O'CLOCK CLUB

DATE

OCTOBER 2015

SCALE

NOT TO SCALE

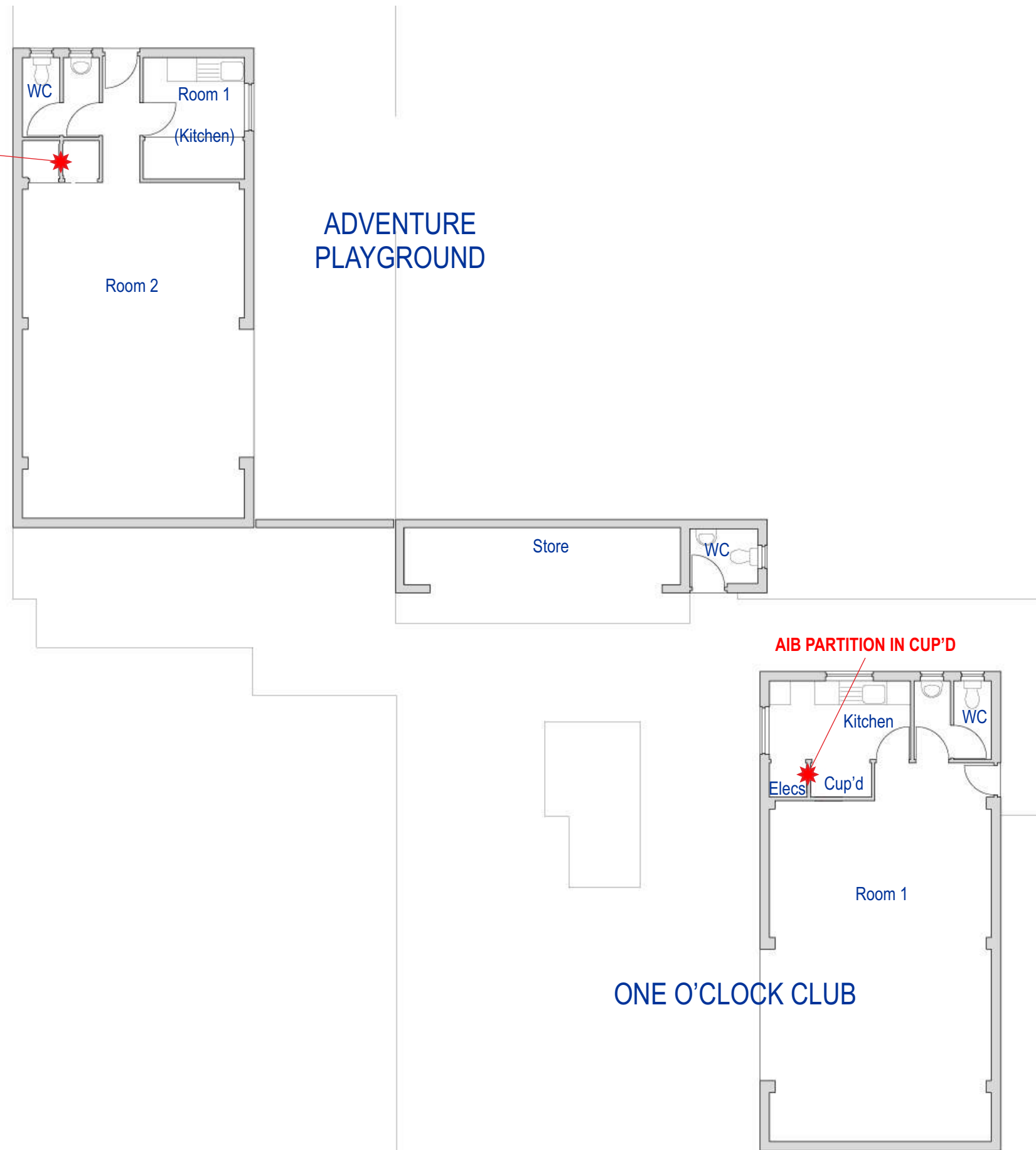
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AMP-MHH-1015-AP

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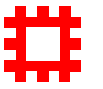


AIB PARTITION IN CUP'D





ONE O'CLOCK CLUB

ADVENTURE PLAYGROUND



ENGLISH HERITAGE

LEGEND

-  Spaces containing ACMs
-  Spaces not yet accessed
- ACM** Asbestos Containing Material
- AC** Asbestos Cement
- AIB** Asbestos Insulation Board
-  Spaces where ACMs have been removed

NOTES

CLIENT
ENGLISH HERITAGE

PROJECT
ASBESTOS MANAGEMENT PLAN
MARBLE HILL HOUSE

DRAWING
MARBLE HILL GROUNDS
CHANGING BLOCK/STORES

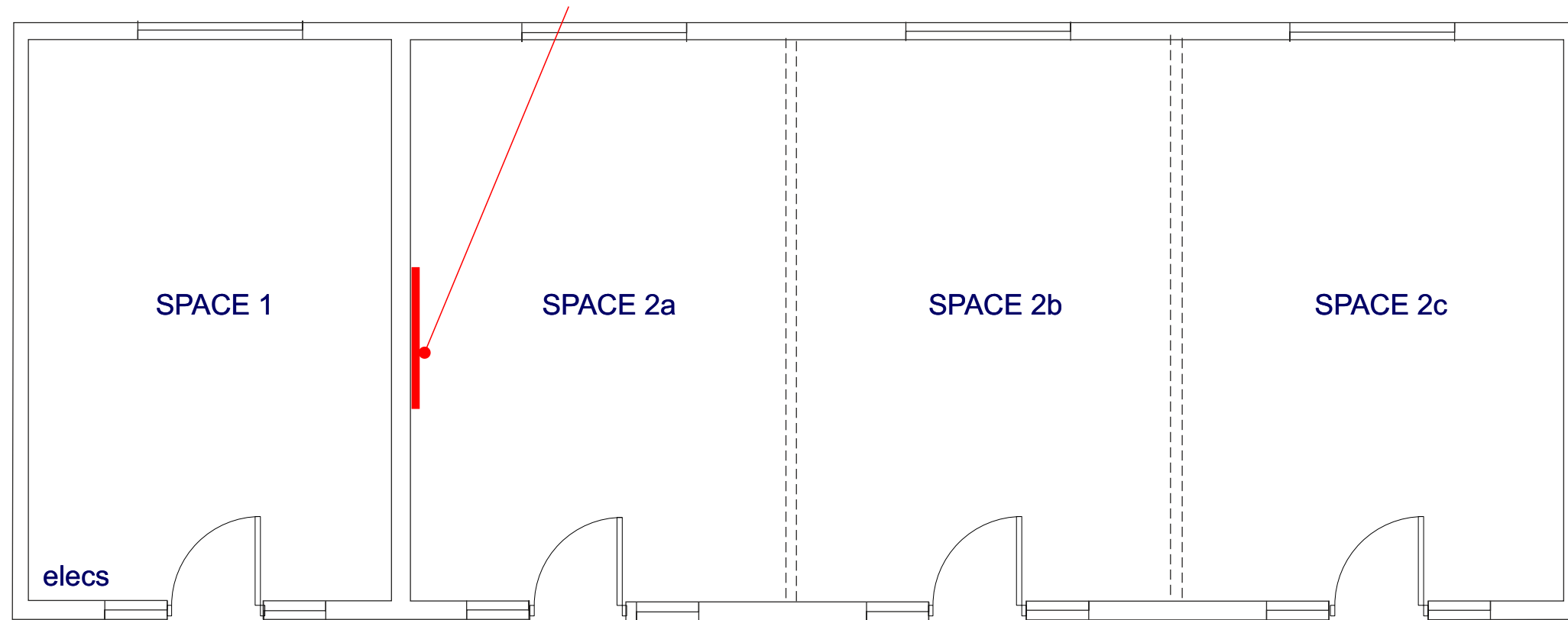
DATE OCTOBER 2015	SCALE NOT TO SCALE
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AC BOARD ON WALL
BEHIND HEATER



APPENDIX 2 - PERMIT TO WORK FORMS & RELATED INFORMATION OR DOCUMENTATION

ENGLISH HERITAGE - ASBESTOS MANAGEMENT - PERMIT TO WORK

PERMIT NO.		ISSUE DATE	
PROPERTY		BUILDING	
COMPANY NAME		COMPANY REPRESENTATIVE	
PRECISE PROPOSED LOCATION(S) OF WORK			
DESCRIPTION OF WORKS			
NUMBER OF PERSONNEL CARRYING OUT WORKS			
ESTIMATED DURATION OF WORKS	START DATE	FINISH DATE	
IS ASBESTOS CONFIRMED, ASSUMED, OR SUSPECTED IN THE SPACE(S) CONCERNED ? YES / NO			
Details (if 'YES')			
DOES CONTRACTOR'S METHOD STATEMENT ADEQUATELY ADDRESS ASBESTOS ISSUES & PRECAUTIONS? YES / NO			
IF NO, LIST PRECAUTIONS TO BE TAKEN TO ENSURE THAT ACM IS NOT INTERFERED WITH IN ANY WAY			
ARE SPECIALIST ASBESTOS REMOVAL/TREATMENT SERVICES REQUIRED? YES / NO			
If 'No', work can proceed. If 'Yes', this Permit cannot be issued. Estates Team to either re-plan job and/or arrange for specialist asbestos contractor services.			
SIGNED FOR CONTRACTOR		SIGNED FOR ENGLISH HERITAGE	
PRINT NAME		PRINT NAME	
HAVE ANY FURTHER SUSPECT MATERIALS BEEN DETECTED AS A RESULT OF THESE WORKS? YES / NO			
Details (if 'YES')			
HAS ESTATES TEAM BEEN INFORMED?			DATE
HAVE ANY ASBESTOS MATERIALS BEEN DAMAGED AS A RESULT OF THESE WORKS? YES / NO			
Details (if 'YES')			
HAS ESTATES TEAM BEEN INFORMED?			DATE
(Estates Team use only)			
DOES MANAGEMENT PLAN REQUIRE REVISING/UPDATING? YES / NO			
MANAGEMENT PLAN UPDATED	BY	DATE	
NEW MANAGEMENT PLAN ISSUED	BY	DATE	

asbestos information & awareness

THE MATERIAL



Asbestos is a generic term given to a number of naturally occurring fibrous hydrated silicate minerals, all with similar fibre characteristics.

Asbestos has long been commercially exploited for its useful properties, including; heat and fire resistance; acid and alkali resistance; flexibility; and high tensile strength.

The raw material was mined then added to other products to manufacture various types of building materials including pipe/ vessel insulation, sheet materials, construction products, etc.

HEALTH HAZARDS



Breathing in asbestos fibres can lead to developing one of three fatal diseases: Asbestosis, Mesothelioma, and Lung Cancer. There is no cure for asbestos-related diseases.

Asbestos is only a risk to health if fibres are released into the air and subsequently inhaled. If ACMs are not disturbed airborne fibres will not be released and therefore they will not pose a risk to health.

Any exposure to asbestos should be avoided, as the risk increases as the level, frequency and duration of exposure increases.

The increased risk to health from a one-off accidental exposure is probably negligible and not a cause for concern.

PRECAUTIONS



Be aware of warning labels and notices.

DO NOT disturb or in any way interfere with materials identified as being asbestos.

If you are unsure about a material being worked on or near, STOP and take further advice.

If you notice any damage or deterioration to asbestos-containing materials, report it to the Duty Manager or Estates Team as soon as possible. DO NOT try to clear up or repair the material without authority and proper precautions.

APPENDIX 3b - ENGLISH HERITAGE - ASBESTOS MANAGEMENT PLAN INFORMATION SHEET

BACKGROUND

In accordance with the Control of Asbestos Regulations [CAR] 2012 any person who owns, occupies, manages, or has responsibilities for non-domestic premises which may contain asbestos [ACMs], has either:

- a legal duty to manage the risk from this material; or
- a duty to co-operate with whoever manages that risk.

To this end, the Estates Team at English Heritage have carried out a series of exercises to locate ACMs, assess the risk from the materials, carry out removal or remediation of the ACMs where warranted, and develop an asbestos strategy culminating in the issue of an Asbestos Management Plan for several English Heritage properties.

WHAT IS ASBESTOS & WHY IS IT DANGEROUS?

Asbestos is a naturally occurring mineral, which due to its inherent properties has long been used in construction for a variety of installations where factors such as thermal insulation, heat insulation, flame retardancy, fire protection, etc. have been key issues.

However, it has been established that breathing in air containing asbestos fibres can lead to asbestos-related diseases, mainly cancers of the lungs and chest lining.

Asbestos is only a risk to health if fibres are released into the air and subsequently inhaled. If ACMs are not disturbed airborne fibres will not be released and therefore they will not pose a risk to health.

Fibres can be released from raw, unsealed asbestos, by accidental mechanical damage, or by uncontrolled removal. Asbestos materials that are sealed and in good condition will not pose a hazard to health as long as they remain that way. If, however, the asbestos is disturbed or damaged, it can become a danger to health because asbestos fibres will be released into the air and people can breathe the fibres in.

It should be noted that the increased risk to health from a one-off exposure is negligible and not a cause for concern.

WHAT IS THE ASBESTOS MANAGEMENT PLAN?

This Asbestos Management Plan is a live document that sets out the principles and methods by which English Heritage will manage the risk from known, presumed or suspected ACMs in their premises. The Plan is designed to prevent exposure to asbestos fibres to two specific groups:

- those who work in or visit our buildings, e.g. staff, guests and visitors; and
- those who work on our buildings, e.g. maintenance staff and contractors.



The methods by which the Plan objectives will be achieved are clearly set out within the Plan, including more background information, Risk Assessments, procedures including the Permit to Work system, and the Plan review system.

WHAT DO I NEED TO DO NOW?

In order for the Plan to be effective, and for English Heritage to not only comply with the HSE regulations, but just as importantly, protect our staff, guests, visitors and contractors, you need to do the following;

- find out where the Plan is kept. This information is available by contacting in the first instance the Duty Manager;
- look at the Plan, establish where ACMs are present in the property, find out about the Do's and Don'ts;
- carefully read the sections on pre-maintenance procedures and the Permit to Work system;
- **make sure that the Plan is made available to any contractor or maintenance personnel BEFORE commencing any work or allowing any work to commence; and, most importantly,**
- **IF IN DOUBT - STOP AND ASK.**

English Heritage

MATERIAL ASSESSMENT (MA)				
AMA Ref. AMP-MHH-02	FLOOR - SPACE	Main House Ground floor - Room 6 understairs cupboard	SAMPLE No. 93588/15	
DETAIL Insulation board to underside of stairs (behind timber over-cladding)		SAMPLE RESULT	Chrysotile	✓
			Amosite	✓
			Crocidolite	X
			NAD	X
ASSESSMENT		See floor plans for detailed location		
Product	2			
Damage	0			
Surface	0			
Type	2			
AMA SCORE	6			
				
PART 2 - PRIORITY ASSESSMENT (PA)				
Variable	Score	Variable	Score	
Normal occupant activity	1	Human Exposure	1	
Likelihood of disturbance	1	Maintenance activity	1	
Priority Assessment (PA) Score	4	Total Risk Score (AMA + PA)	10	
Management Strategy	Inform, Manage, Restrict			
PART 3 - RE-INSPECTION NOTES				
Re-inspected October 2015, no apparent change in condition since last inspection, full mechanical protection in place, labelled				
Re-inspect by end of Q4 2016 or if maintenance/refurb access required in the meantime				

