

Mid Devon Housing

Building Services

**Asbestos Management Plan –
DRAFT**

August 2024

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1.0 General Policy Statement for Asbestos

- 1.1 Mid Devon Housing (MDH) has a legal duty to manage the Asbestos Containing Materials (ACMs) within its housing stock. This duty is placed on it by the Control of Asbestos Regulations 2012 as well as the Health and Safety at Work Act 1974, The Construction Design and Management Regulations 2015 (CDM), The Reporting of Injuries, Diseased and Dangerous Occurrences Regulations (RIDDOR) and the Social Housing (Regulation) Act 2023
- 1.2 There are two duties
 - The duty to manage asbestos in non-domestic premises
 - The duty when working with asbestos
- 1.3 In accordance with section 10 of the Social Housing (Regulation) Act 2023, as a Registered Provider of social housing, MDH must also designate an individual to monitor the provider's compliance with all health and safety requirements and assess risks of failure to comply with these. This relates to the wellbeing of our tenants, which will include ensuring that there are effective Asbestos management arrangements in place. This designated person is referred to as the Health and Safety Lead and for MDH is the Head of Housing and Health.
- 1.4 Furthermore, as a Registered Provider, MDH must meet the requirements of the statutory Consumer Standards set by the Regulator of Social Housing. This includes the Safety and Quality Standard, which requires landlords to provide safe and good quality homes for their tenants. MDH has an overarching Homes Safety Policy which demonstrates how we will meet these wider, related requirements. A copy of the policy is available on the MDH website at <https://www.middevon.gov.uk/residents/mid-devon-housing/help-and-support/procedures-policies-and-strategies>
- 1.5 This management plan details the approach MDH takes when working with asbestos in its housing stock. Also MDH will do everything reasonably practicable to manage the risk and prevent harm to all persons caused by the release of asbestos fibres from the ACMs contained within its properties.
- 1.6 This management plan is not prepared in relation to the duty to manage asbestos in non-domestic properties as set out in Regulation 4 of the 2012 Regulations.
- 1.7 The duty to manage the asbestos in common parts of multi-occupancy domestic premises, like purpose built flats also falls on MDH. This is dealt with as a generic approach within Appendix 6
- 1.8 MDH's long-term aim is to safely manage the ACMs within the properties it is responsible for, while also managing its available budgets.

2.0 Introduction:

2.1 This Management Plan details the approach that MDH is taking for the day to day management of ACMs within its stock and is based on the template that is available from the Health and Safety Executive's website.

www.hse.gov.uk/asbestos/duty/asbestos-management-plan.htm

2.2 This Management Plan is to be read in conjunction with Mid Devon District Council's Asbestos Policy

3.0 Responsibilities

3.1 The Head of Housing and Health (The Duty holder) will:

- a) Will ensure that there are sufficient resources available for the implementation of this plan.
- b) Will delegate responsibility for the implementation of this plan to the Managers
- c) Will review the provisions and resources required for the efficient operation of this plan every year.
- d) Act immediately if the requirements of this plan are not met or if there is a fundamental change in any circumstances or assessment associated with this plan.

3.2 The Operations Lead for Mid Devon Housing (The Appointed Person) will:

- a) Ensure that there are sufficient resources available for the implementation of this plan.
- b) Ensure that the requirements of this plan are implemented
- c) Ensure that risk assessments and safe systems of work are in place
- d) Ensure that employees are competent and receive the necessary training, information and supervision whilst performing any tasks in regards to this plan.
- e) Maintain the training matrix for employees
- f) Communicate this plan to all employees and raise awareness of the risks associated with asbestos to employees, contractors and tenants.

3.3 The Planned Maintenance Manager (Deputy Appointed Person) will:

- a) Be suitably trained
- b) Ensure that the requirements of this plan are implemented
- c) Ensure that the Asset Database is updated
- d) Store the digital asbestos surveys and update reports on a shared folder
- e) Establish contracts for surveys, and management works with licensed and unlicensed asbestos removal contractors
- f) Carry out competency checks of surveying and works contractors
- g) Review and update the asbestos register

- h) Be responsible for monitoring the ongoing condition of the Asbestos Containing Materials via a specialist officer.
- i) Review the Asbestos Management Plan annually and develop the Action Plan
- j) Provide details of the asbestos register and site plans to the emergency services when requested.
- k) Implement resilience testing for planned and unplanned work and accidental disturbance of an ACM

3.4 The Maintenance Supervisor (Cyclical) Building Maintenance will:

- a) Maintain the asbestos database and register, and produce programmes relating to the annual inspections and works where appropriate
- b) Maintain the shared folder for the digital asbestos register and update reports. R:\ASBESTOS INFORMATION
- c) Review and update the asbestos register
- d) Provide details of the asbestos register and site plans to the emergency services when requested.
- e) Communicate the location of the asbestos register on a regular basis

3.5 Surveyors/Supervisors/Technical Support and Repairs Manager will:

- a) Ensure that a risk assessment and safe systems of work are in place for the asbestos management works within their responsibility.
- b) Arrange surveys for the works they manage and ensure that this information is entered onto the asset database.
- c) Check that contractors and employees they manage have the skill, knowledge, experience and training required for the work.
- d) Provide employees and Contractors with a copy of the asbestos register and/or the asbestos survey report of the properties affected by the works.
- e) Issue permits to work and provide inductions
- f) Where they have direct line management responsibility, provide a risk assessment detailing suitable control equipment and procedures
- g) Provide details on what must be done if an ACM is unexpectedly disturbed. Appendix 2
- h) Store any statement of cleanliness/reoccupation certificate and waste consignment note for the work they are managing on the shared folder with the file R:\ASBESTOS INFORMATION
- i) Arrange for adequate training for employees

3.6 Employees will:

- a) Comply with this asbestos management plan and notify their Supervisor / Manager of any issue concerning them relating to asbestos and ACMs.
- b) Undertake any asbestos awareness and task specific training relating to their work.
- c) Ensure that they have a copy of the survey information, a risk assessment and method statement for the work they are undertaking.

- d) Ensure they have the correct personal protective equipment, other suitable equipment and have been trained to carry out the work.
- e) Refuse to carry out any work relating to the management of asbestos where the above has not been provided
- f) An appointed Specialist Officer will re-inspect the asbestos and record the condition within the asset database

3.7 Licensed and Unlicensed Asbestos Contractors/Surveyors will be required to:

- a) Comply with current legislation and associated Approved Codes of Practice and guidance.
- b) Provide their employees with the appropriate training, health screening for the works, PPE, risk assessments and method statements as well as inductions and copies of the survey report.
- c) Carry out surveys following the HSG 264 The Survey Guide [Asbestos: The survey guide HSG264 \(hse.gov.uk\)](https://www.hse.gov.uk/asbestos/surveyguide.htm)
- d) Attend site to assess and prepare a Plan of Work and submit this to the HSE
- e) Attend site to assess and prepare a Risk Assessment and Method Statement and provide MDH with a copy
- f) Notify the HSE of any Notifiable Non Licensed Work (NNLW)
- g) Provide a safe method of work for emergencies that will be discussed and agreed with the Principle Designer or Contract Administrator managing the works
- h) Provide specialist asbestos advice
- i) Arrange transport and disposal of asbestos waste materials in accordance with current regulation and good practice.
- j) Arrange Four Stage Air Clearance and Certificate of reoccupation or a Statement of Cleanliness.
- k) Provide copies of Notifications, Certifications, Waste Consignment Notes and other relevant documentation on request to the Principle Designer or Contract Administrator

3.8 All other Contractors will

- a) Restrict access from areas where asbestos is present.
- b) Provide their employees with the appropriate asbestos training to ensure they understand any information they are provided with and what they are being asked to do.
- c) Provide their employees with information from the asbestos register or survey of the property they are working on.
- d) Provide their employees with inductions, including provision of the risk assessment and method statement.
- e) Implement a safe system of work
- f) Provide a permit to work, if required.
- g) Provide adequate PPE, management and supervision.

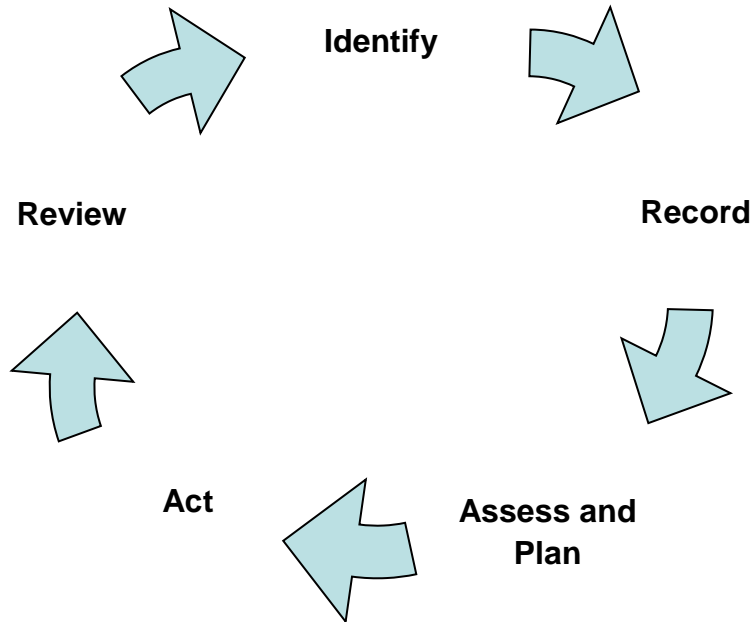
3.9 The Health and Safety Advisor will:

- a) Investigate and report incidents under RIDDOR
- b) Provide advice on Asbestos Awareness and Task Training for staff as necessary.
- c) Provide advice on good practice, relevant legislation and assess compliance.

4.0 Managing Asbestos within Mid Devon Housing's Stock

4.0.1 No new or recycled ACMs can be used.

4.0.2 As part of the legal obligation to manage the ACMs within the housing stock, MDH have to carry out the following processes:



4.1 Identify

- 4.1.1** MDH are legally obliged to identify the ACMs within the housing stock prior to managing them and before allowing any works to start that may disturb the asbestos fibres for both Major and Minor Works.
- a) Major Work includes planned/cyclical/voids which require technical input and pre-assessment. This will include preparation of drawings, sketch details, specifications, notes, schedules or contract documents
 - b) Minor Work are defined as those that would normally be actioned by the issuing of a works order or instruction and would include emergency, reactive, routine, day-to-day or other small jobs.
- 4.1.2** ACMs are identified by carrying out a survey and taking samples following The Survey Guide HSG 264, available from the Health and Safety Executive (HSE) [Asbestos: The survey guide \(hse.gov.uk\)](https://www.hse.gov.uk/asbestos/surveyguide/). There are two types of survey, a Management Survey used to identify ACM's with only a minor amount of intrusive work and a Refurbishment and Demolition Survey, used where major works including demolition are planned. MDH have a contract with a competent asbestos surveying contractor for this role.
- 4.1.3** MDH currently has management surveys, which includes samples, of over 75% of its housing stock and is working towards a target of 100% by 2026. Where there are gaps in our information we arrange for a survey to be carried out or rely on cloned information.
- 4.1.4** Refurbishment and Demolition Surveys are carried out where more intrusive works or demolitions are planned
- 4.1.5** Re-inspections of known ACMs are carried out at a rate of 20% per annum, unless there is a recommendation within the survey report that this should be done sooner.

4.2 Record

- 4.2.1** When an asbestos material is identified via a survey and a UKAS accredited laboratory analysis; the results are recorded within the Asset Database, which is a live document and provides the information for the Asbestos Register that MDH are legally obliged to hold and maintain.
- 4.2.2** The Asbestos Register contains information including the type of asbestos, its condition and location, which is continually updated from the surveys, re-inspections and removal reports as they are received. A copy is held on the shared drive R:\ASBESTOS INFORMATION\ASBESTOS REGISTER

- 4.2.3** The Asbestos Register into which ACM locations are entered is maintained by the Maintenance Supervisor (Cyclical) Building Maintenance.
- 4.2.4** MDH is legally obliged to provide a copy of the Asbestos Register to all employees and contractors prior to them starting work on a property. Operatives are provided with this information via their tablets.
- 4.2.5** Tenants and Leaseholders have been provided with details of where asbestos is contained within their homes as well as guidance on how to deal with asbestos in an information letter sent during 2020 and as part of their tenancy sign up pack. This information is also to be provided upon request.

4.3 Assess and Plan

- 4.3.1** The asbestos register is to be reviewed annually to identify an Action Plan of measures, works and recommendations relating to the management of the ACMs.
- 4.3.2** The following priorities will be used to drive the programmes of work within an Asbestos Action Plan.
- a) Any ACMs with a Material Assessment score greater than 10 require immediate action.
 - b) Any ACM in good condition, but with a high potential for disturbance either during normal occupancy or foreseeable maintenance should be protected or removed
 - c) ACM's likely to be disturbed by any major planned refurbishment works must be removed unless work can be designed to avoid the ACMs
 - d) Some ACMs may require more frequent condition checks to inform long term management actions
 - e) Some locations may be subject to activity changes and will require a review of the actions and priorities
 - f) When surveys or condition checks identify further information, this and any altered priorities as well as the impact is to be included in the action plan.
- 4.3.3** The Action Plan of measures are aimed at reducing the higher level assessment scores
- 4.3.4** Where an existing ACM has been identified and it is in good condition, not releasing fibres and not subject to abrasion, damage or imminent works, it should be left undisturbed.
- 4.3.5** The decision to remove an ACM that is in good condition is only made under the following conditions:

- a) When the property is empty and it is safer to carry out the works rather than when the property is occupied.
- b) When there are major works planned that would significantly disturb the ACM.
- c) When there is an anticipated spike in the removal costs in the future and there is an opportunity to considerably reduce that anticipated spike by bringing the works forward.

4.3.6 Before the ACM has any management works carried out to it. The works need to be assessed to determine if the work can be carried out by a **Licensed or Unlicensed Contractor**. To help with this there is a **Decision Flow Chart** contained within Appendix 1. This flow chart is to be treated as a guide; if there is any doubt a manager is to be consulted regarding the decision.

4.3.7 When it has been recommended that the works should be carried out by an Unlicensed Contractor, but there is a higher risk of fibre release due to the condition of the material, it may need to be treated as Notifiable Non Licensed Works (NNLW).

4.4 Act.

4.4.1 This may include, but is not limited to, full or partial removal, encapsulation or monitoring. All of these are known as measures.

4.4.2 When a decision has been made to carry out work to an ACM a decision then has to be made as to whether a licensed or unlicensed contractor can carry out that work.

4.4.3 All employees and contractors must have appropriate **awareness and/or task** training at a sufficient level before being allowed to work on any of MDHs stock; including to any ACM that is not being removed or encapsulated. Some tasks, like cleaning vinyl floor tiles, can be done by workers who have had asbestos awareness training.

4.4.4 Anyone doing unlicensed works must be suitably trained for the task and follow the HSE's guidance www.hse.gov.uk/asbestos/essentials. The guidance is the HSE's task manual for building, maintenance and allied trades on non-licensed asbestos work (Asbestos Essentials). MDH have a contract in place with a suitable qualified unlicensed asbestos contractor.

4.4.5 Some tasks, for example the removal of multiple damaged AIB ceiling tiles, must be done by a licensed contractor.

4.4.6 A licensed contractor is qualified to work with ACM's that pose the highest risk to health by the type of asbestos and potential for fibres to be released from that material. The list of these contractors can be found on

the HSE's website [Current Licensed Asbestos Contractors | CONIAC](#)
MDH have a contract in place with a suitable qualified licensed asbestos contractor.

- 4.4.7** Before any Licensed or Unlicensed works are carried out the contractor must supply a risk assessment and method statement. For Notifiable Non-Licensed Work the contractor must submit a notification to the HSE before starting the work. In the case of the licensed work the contractor must supply the HSE with a notification of work two weeks in advance. This is also known as the Plan of Work or ASB5, and the contractor will provide a copy of this to MDH upon request.
- 4.4.8** Where a suspected ACM is discovered that is not on the Asbestos Register, work that may disturb it is to stop and it is to be reported to a manager within Building Services to allow a sample survey to be carried out and the appropriate action taken to manage the material.
- 4.4.9** If an ACM has been accidentally disturbed then work in that area is to cease. The Contract Administrator must be notified and the Contingency Plan within Appendix 2 needs to be implemented.
- 4.4.10** All asbestos waste must be disposed of in an approved licensed tip. Only an approved registered waste carrier is permitted to dispose of waste from site to point of final disposal. The contractor must provide a method statement as to the complete packaging and removal of the waste to the point of final disposal and provide copies of the Waste Transfer/Consignment Notes to the Contract Administrator.
- 4.4.11** Upon completion of the unlicensed works the contractor is to supply a copy of the Statement of Cleanliness and Waste Consignment Note
- 4.4.12** Upon completion of the licensed works, the contractor is to supply a waste consignment note and a satisfactory copy of the four stage air clearance certificate that is also the certificate of reoccupation. Where a partial enclosure has been used a limited four stage air clearance certificate will still be required.

4.5 Review

The Planned Maintenance Manager and the **Maintenance Supervisor (Cyclical) Building Maintenance** are to review the Asset Database and Asbestos Register throughout the year to identify works and also to identify more effective ways of managing the asbestos that is contained within the housing stock.

5.0 Training

- 5.1** Employees such as surveyors, supervisors, contract managers, health & safety staff, trade operatives and caretakers will receive one full day

training on general asbestos legislation and awareness training, which is to be recorded on the learning hub.

5.2 Asbestos awareness refresher training will be held to meet legislative requirements or when the legislation changes or following a reportable incident.

5.3 All contractors' operatives working on MDH properties will also have had to receive appropriate Asbestos Awareness Training within the last year and all MDH operatives who will work with ACMs will undertake non-licensed task specific training on working with asbestos.

6.0 Fly Tipped waste

6.1 When a report has been received that a suspected ACM has been illegally tipped in an area that is the responsibility of MDH. The Planned Maintenance Manager is to be notified and is to arrange for it to be removed via the Contract with the Licensed or Unlicensed Asbestos Contractor. If the Planned Maintenance Manager is not available, the Operations Lead Mid Devon Housing is to be contacted

6.2 Prior to its removal the Repairs Service are to cordon off the area to prevent unauthorised access.

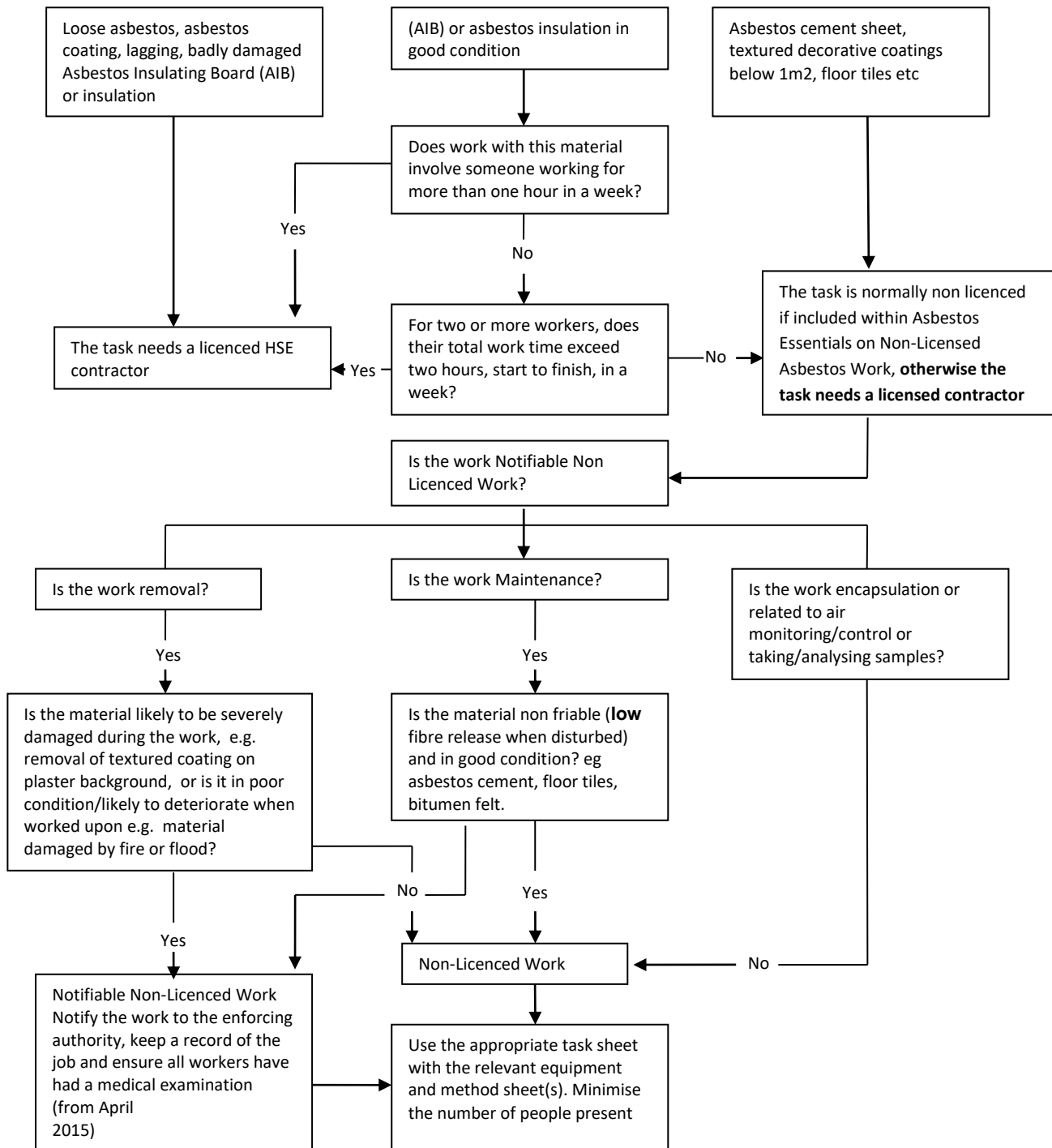
6.3 The Planned Maintenance Manager is to contact the Housing Management Service to inform them of the anticipated actions and to allow them to contact nearby residents and let them know of the actions being taken.

6.4 Upon completion of the removal and disposal works the Contractor is to supply the Waste Consignment Note and Certificate of Reoccupation.

6.5 When a report is received out of hours, the out of hours team are to contact the standby officer, who will coordinate the appropriate action.

Appendix 1 - Decision flow chart

Use this simple flow chart as a guide to help you decide who needs to do the work.



Appendix 2 – Contingency Plan – Procedures to be followed in the event of unexpected exposure to suspected asbestos fibres

- 2.1 Immediately stop all work in the area
- 2.2 Evacuate and seal off the immediate area, for example by closing doors etc. If this involves tenants or members of the public, it may need to be done with the assistance of housing management.
- 2.3 Prevent anyone else from entering the area
- 2.4 The incident should be reported immediately to a supervisor
- 2.5 The Supervisor will check the Asbestos Register. If the material is confirmed or suspected to be asbestos then.
- 2.6 There should be an immediate site visit by an appropriately qualified Surveyor from Wakeham Asbestos Services Ltd to decide on the measures required.
- 2.7 Notify the Health and Safety Advisor and the Corporate Manager for Public Health Regulation and Housing and seek their advice.
- 2.8 Notify the Health and Safety Executive of the incident with copies of correspondence to Supervisor in charge of works. The HSE's concerns team are also to be notified. Update the accident book and consider reporting the incident as part of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- 2.9 After carrying out any necessary measures to make the area safe, ensure the contractor issues a statement of cleanliness or certificate of reoccupation before allowing access
- 2.10 Counselling/health surveillance for anyone affected to be considered;
- 2.11 Notify the Estates Manager in case of publicity and insurance claim by parties involved.
- 2.12 A debrief should be held after the matter has been fully dealt with to review the incident, determine what measures, if any, that could be taken to prevent a recurrence. To be chaired by the Health and Safety Officer with input from the surveyor involved and Housing Management as required.
- 2.13 Operations Lead for Mid Devon Housing to draw up and circulate an appropriate advisory notice and make recommendations for inclusion in the Asbestos Management Plan at the next review.
- 2.14 Asbestos register to be updated

Mid Devon District Council

Corporate

Asbestos Management

August 2022

Version Control

Title: Asbestos Management Policy

Purpose: Compliance with health and safety legislation

Owner: M Lowman

Date: January 2022

Version Number: 3.0

Status: Final

Review Frequency: at least every 3 years

*Next review date: **February 2025***

Consultation:

This document has obtained the necessary approvals:

Purpose

Mid Devon District Council aims to be a responsible employer which accepts its responsibilities and duties to provide a safe working environment for all employees, in accordance with the provisions of the Health & Safety at Work Act 1974, the Workplace (Health, Safety and Welfare) Regulations 1992 and measures to ensure the management and control of existing asbestos is carried out in accordance with the Control of Asbestos at Work Regulations 2012.

Asbestos Policy

1. Introduction

This policy document refers to the Council's arrangements for managing the risks of exposure to asbestos by employees and non-employees within its activities.

Staff involved with maintenance of buildings, supervising such work, or issuing contracts should fully familiarise themselves with the contents of this document.

Asbestos was widely used as a building material for many years, particularly between the period 1950–1980 and can be found in a wide variety of forms, being used in all aspects of the construction process. The use of asbestos products for construction materials is severely restricted today, due to the long-term legacy of illness associated with exposure to the product.

There are many forms of asbestos, the main types being:

- white asbestos (chrysotile);
- brown asbestos (amosite);
- blue asbestos (crocidolite).

All types of asbestos are considered dangerous and stringent control limits are set for personal exposure (0.1 fibres per cubic centimetre averaged over a continuous period of 4 hours).

There are a number of problems associated with exposure to asbestos namely:

- asbestos fibres are not detectable to the naked eye;
- the health effects of exposure can be fatal;
- the onset of symptoms is often delayed for decades after exposure;
- there is widespread public concern over exposure;
- asbestos was widely used in the construction industry and will be found in many pre-1980 buildings (although not exclusively);
- it is not possible to determine that a material contains asbestos by visual examination;
- by law - exposure has to be rigorously controlled and monitored.

It is not possible to identify asbestos by its colour as the age of the product and its combination with other products can alter the appearance.

Approximately 5,000 people die each year from asbestos-related diseases and this number is increasing year on year. Many of these deaths are from working in high risk industries many years ago with the emphasis now being on the maintenance trade. There are now much more stringent controls over the management of asbestos in the workplace to ensure that its presence is identified and an appropriate management plan put into place to prevent exposure.

The legislation relating to the control of asbestos in the workplace is extensive and is supported by Approved Codes of Practice and HSE Guidance Notes. This chapter provides a general overview of how to manage asbestos in the workplace **but does not provide guidance as to the safe treatment or removal of asbestos due to the specialist nature of the work and its applicability to a minority of employers, who by the very nature of their business have to be fully aware of the legislative requirements. These employers must be licensed by the Health and Safety Executive to work with asbestos. Mid Devon District Council is not licensed and must therefore employ external properly licensed contractors where required by law (see section 7).**

Asbestos only causes problems when fibres are released into the atmosphere, such as when it is being worked on, disturbed by nearby maintenance work, or where the material is friable and may suffer abrasion or there are strong air currents. If the asbestos is in a good condition and protected against damage, the danger will be negligible unless the material is being worked on. It should be noted that potentially more problems can be caused by removing sound and protected asbestos than by leaving it in place so, if depending on risk assessment the risk is considered to be low, it is best left undisturbed.

The supply and use of asbestos and asbestos-containing products is prohibited (except for a limited number of specified uses). Asbestos-containing products in use before 1 January 1986 (blue and brown asbestos), 1 January 1993 (other forms of asbestos except white asbestos) and 24 November 1999 (white asbestos) were permitted to be used, but their replacement must be of an asbestos-free material. Once an asbestos material has been removed arrangements must be made for its safe disposal.

2. Responsibilities

Mid Devon District Council's policy on asbestos must ensure that known and identified locations of asbestos are recorded and that this information is given to those persons who require it to protect not only themselves but others around them. The 'Duty to Manage' requirement under Regulation 4 of the Control of Asbestos Regulations 2012 will apply.

The Chief Executive is ultimately held responsible for compliance with health and safety law. Below the Chief Executive level, Managers are identified as being responsible, so far as is reasonably practicable, for managing the health, safety and welfare at work of all employees in their respective areas, and for non-employees where their health or safety may be affected by the Council's activities. In particular Managers will:

- Maintain an Asbestos Register identifying the locations and types of asbestos that are within the Council's control.
- Make a point of checking the relevant Asbestos Register at the point where works are planned.

- Prepare and revise as necessary the arrangements for managing work involving asbestos material in their service area.
- Ensure works involving licensed asbestos are carried out by a licensed competent contractor and that the work is notified to the HSE using the FODABB5 notification form (see www.hse.gov.uk).
- Ensure that adequate resources are made available to enable the arrangements to be implemented. Arrangements include management surveys, analysis and where necessary advice and removal by a specialist licensed contractor.
- Ensure appropriate asbestos awareness training, information and instruction is provided for relevant employees.
- Ensure that where specialist technical expertise in relation to asbestos is not available within the Service, suitable arrangements are made to obtain this information as required. This can be obtained from the Environmental Services Manager or the Corporate Health and Safety Advisor as the first point of contact.
- Ensure that employees or relevant contractors are provided with all the appropriate information, instruction and training on work being undertaken in areas containing anything suspected of containing asbestos.

The Corporate Manager for Public Health, Regulation & Housing is responsible for maintaining an Asbestos Register of all MDDC corporate buildings and domestic council owned tenanted property and shall be responsible for ensuring that all designated responsible premises officers are aware of the locations, condition and control measures recommended to prevent risks to health and safety.

Asbestos Registers must be continuously reviewed and updated as changes occur.

3. Health Effects of Asbestos

There are three main types of serious health risks associated with exposure to asbestos fibres:

Asbestosis – chronic obstructive lung disease

Lung cancer – a fatal lung disease

Mesothelioma – a fatal cancer of the outer lining of the lung specific to asbestos exposure.

It is recognised that the largest group of workers at risk from asbestos exposure are workers involved in the repair and maintenance, refurbishment and demolition of buildings, including electricians, plumbers, joiners, computer and telecommunication

engineers – people who may encounter asbestos during their normal day to day work activities.

5. Legislation

The legislation relating to the management of asbestos in the workplace can primarily be found in:

- Health and Safety at Work etc Act 1974 (general duties on employers and management of premises);
The general provisions of the 1974 Act are applicable to the management of asbestos in the workplace, particularly s 2 (duty towards employees), s 3 (duty to non-employees) and s 4 (duty of person having control of premises).
- Management of Health and Safety at Work Regulations 1999;
The Management Regulations require employers to undertake risk assessments of the risks to health and safety arising out of, or in connection with, their business.
Duties are also placed in respect of co-operation and co-ordination where persons are sharing a workplace.
- Workplace (Health, Safety and Welfare) Regulations 1992;
These Regulations place requirements on employers to maintain their buildings so as not to cause a risk to health and safety.
- Construction (Design and Management) Regulations 2015;
These Regulations require clients to provide pre-construction information to persons carrying out construction work. Such information would include the results of any asbestos surveys undertaken in the premises. There is also a requirement to ensure that the 'health and safety file' is prepared and maintained for future reference.
- Defective Premises Act 1972;
The Act places a duty on landlords to ensure that tenants and other persons are safe (so far as is reasonable) from personal injury or disease that results from the defective state of the premises.
- Control of Asbestos Regulations 2012.
The Regulations set out the duties relating to exposure to asbestos and its correct management. The Regulations include:
 - management in non-domestic premises (reg 4);
 - identification of the presence of asbestos (reg 5);
 - assessment of work that exposes employees to asbestos (reg 6);
 - plans of work (reg 7);
 - licensing of work with asbestos (reg 8);
 - notification of work with asbestos (reg 9);

- information, instruction and training (reg 10);
- prevention or reduction of exposure to asbestos (reg 11);
- use of control measures (reg 12);
- maintenance of control measures (reg 13);
- provision and cleaning of protective clothing (reg 14);
- arrangements to deal with accidents, incidents and emergencies (reg 15);
- duty to prevent or reduce the spread of asbestos (reg 16);
- cleanliness of premises and plant (reg 17);
- designated area (reg 18);
- air monitoring (reg 19);
- standards for air testing and site clearance certification (reg 20);
- standards for analysis (reg 21);
- health records and medical surveillance (reg 22);
- washing and changing facilities (reg 23);
- storage, distribution and labelling of raw asbestos and asbestos waste (reg 24);
- labelling of products containing asbestos (reg 30);

7. Asbestos Licensing

The 2012 regulations prohibit anyone from carrying out work with high risk asbestos e.g. insulation, asbestos coating or asbestos insulating board unless they hold a licence granted by the HSE (Health & Safety Executive).

To be exempt from needing a licence the work must be:

- Sporadic and low intensity - to be considered sporadic and low intensity the concentration of asbestos in the air should not exceed 0.6f/cm³ measured over 10 minutes; and
- Carried out in such a way that the exposure of workers to asbestos will not exceed the legal control limit of 0.1 asbestos fibres per cubic centimetre of air (0.1 f/cm³); and
- Meet at least one of four other conditions:
 - It is a short non-continuous maintenance task, with only non-friable materials (friability describes how likely an ACM is to release asbestos fibres when worked on, so non-friable materials will only release a small number of fibres during work); or
 - It is a removal task, where the ACMs are in reasonable condition and are not being deliberately broken up, and the asbestos fibres are firmly

contained within a matrix, e.g. the asbestos is coated, covered or contained within another material, such as cement, paint or plastic; or

- It is a task where the ACMs are in good condition and are being sealed or encapsulated to ensure they are not easily damaged in the future; or
- It is an air monitoring and control task to check fibre concentrations in the air, or it's the collection and analysis of asbestos samples to confirm the presence of asbestos in a material.

8. Notification of Non-licensed asbestos work (NNLW)

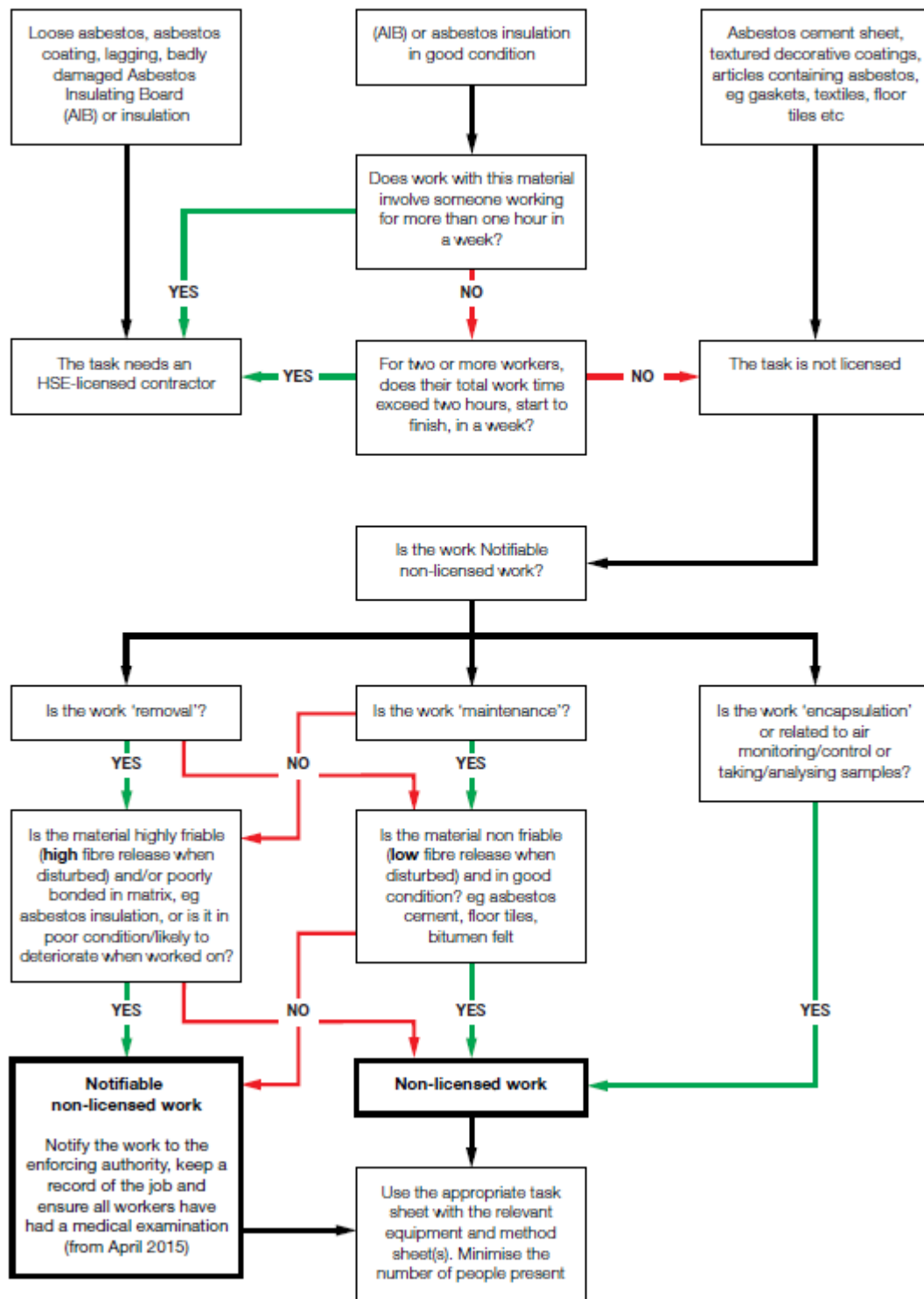
The Control of Asbestos Regulations 2012 introduced the following requirements:

- Notification of certain types of relatively low-risk work on ACM that does not require the use of a licensed contractor. This notification is on-line here <https://extranet.hse.gov.uk/lfservlet/external/asbnnlw1>
- Medical examination of those persons carrying out the work
- Maintaining registers of work (health records)

Whether a type of asbestos work is either licensable, NNLW or non-licensed work has to be determined in each case and will depend on the type of work that is going to be carried out, the type of material being worked on, and its condition. The identification of the type of asbestos-containing material (ACM) to be worked on and an assessment of its condition are important parts of the risk assessment that must be carried out before the work commences. The HSE asbestos essentials guidance (AE) includes the following to assist:

Decision flow chart

Use this simple flow chart to help you decide who needs to do the work:



9. Policy Application

The following arrangements consist of a series of procedures which are intended to safeguard persons who may encounter the possibility of discovering asbestos in the

course of their work and to ensure the safety of any premises occupants who may be affected by any associated works which may involve the disturbance of asbestos containing materials.

All reasonable practicable steps will be taken to ensure that MDDC employees, tenants and contractors working on behalf of the MDDC will not be exposed to hazards associated with materials containing materials.

10. Asbestos Surveys

The Health and Safety Executive (HSE) publication HSG264 Asbestos: The Survey Guide sets out how to survey workplace premises for asbestos containing materials and how to record the results in a usable form. A decision needs to be taken at an early stage as to whether to carry out a management or refurbishment/demolition survey – or a mixture of the two.

Management Survey:

Seen as a standard survey (previously known as Type 1, 2 or 3 asbestos surveys) – these are concerned with the risk management of asbestos in normal occupation and will be less expensive, intrusive and disruptive than the alternative. The emphasis is on identifying asbestos containing material (ACM) as far as is reasonably practicable and assessing the potential for fibre release during normal occupancy of the building and the activities carried out there – including during routine maintenance and repair e.g. redecoration.

Refurbishment and Demolition Survey:

Where major refurbishment or demolition is planned, this is an intrusive examination of the building including sampling to identify and control the risks of asbestos release. Refurbishment can include projects where plant is removed from a building.

A systematic programme of surveying all MDDC owned domestic and Corporate properties has been undertaken overseen by Housing and Property Services and as these are reviewed they will be brought into line with the current guidance HSG264.

12. Asbestos Register

Data collected on site will be input by the Housing and Property Services onto the Asbestos Register.

The information will include:

- Property information;
- Inspection method;
- Surveyor's detail;
- Site plans;
- Material detail;
- Sample analysis results;
- Material assessment;

- Priority assessment;
- Risk rating;
- Management recommendations

13. Material Assessment

The condition of each asbestos element identified on site is assessed using the material assessment algorithm as defined in the HSE publication HSG264.

The assessment will depend on four different parameters:

- Asbestos type
- Product type
- Extent of damage
- Surface treatment

15. Assessment Score

The total score of material assessment and priority assessment gives the risk rating which is high, medium, low, or very low.

This is used to determine the management actions necessary for ensuring safety.

- High - urgent action required
- Medium - remedial works required
- Low/very low - manage/maintain

All the information collected during the asbestos surveys will be recorded in the Asbestos Register.

The Asbestos Register of Council owned housing will be maintained in the Housing Services (repairs and maintenance) offices at Old Road depot, Tiverton.

The register for all Corporate buildings will be maintained by the Facilities and Corporate Buildings Manager and held at Phoenix House.

A hard copy of the register will be issued to the responsible officer of each property on the register.

Access to the Register will also be made available to property managers, Building Maintenance staff and contractors working on the property.

The public utility services, the fire brigade and others whose presence may expose them to possible risk from asbestos will have access to the council asbestos register as appropriate.

18. Information for Contractors

All officers with the responsibility for issuing works orders will ensure that prior to the works commencing the asbestos register is consulted and the existence of asbestos is brought to the attention of the contractors in writing, clearly identifying areas which are known/presumed to have asbestos containing materials. In addition a **“Permit to Work”** will be issued to all contractors prior to commencement of both licensed and non-licensed work activities.

Where contractors arrive on site, they must be under instruction to report their presence and identify the tasks that they are to carry out to the responsible property officer. At this point the Asbestos Register located at the Old Road or Phoenix House must be accessed and the premises must be checked to confirm either way the information previously issued by the ordering officer.

Should the contractors discover any variances to the information contained in the asbestos register, this must be reported to the Manager responsible for Asbestos management to enable him to update the Register.

19. Asbestos Licensed Contractors

A system of vetting and appointing suitable applicants for inclusion on the Council’s standing list of asbestos contractors is operated. Contractors carrying out work on behalf of the Council are subject to performance monitoring and recording.

Only contractors who have been vetted and approved by MDDC Housing and Property Services shall be eligible to tender for asbestos work. All Contractors shall be reviewed by the Housing and Property Services Manager every five years.

Housing and Property Services shall ensure that prior to any asbestos removal works being undertaken, the appointed contractors provide all relevant documentation required for works with asbestos.

This shall include:

- ASB5 notification form and plan of work
- Copy of their Asbestos Licence
- Company insurance document
- Company Health and Safety policy
- CDM Health and Safety plan as notified to the HSE
- Training records
- Medical Certificates
- RPE face fit test certificates
- Plant examination and test certificates
- Permit to work
- COSHH data
- Waste disposal arrangements

Documentation required on completion of the removal works shall include:

- Site diary

- Site induction records
- Daily enclosure and air lock inspection records
- Daily negative pressure units and vacuum inspection records
- Respirator inspection records
- Daily decontamination unit inspection records
- Operative showering records
- Working platform inspections
- Air monitoring and clearance certificates
- Personal air monitoring records
- Asbestos exposure records
- Waste consignment notes

20. Disposal of Asbestos Waste

The contractor used for the disposal of asbestos must be licensed for this by the Environment Agency.

All asbestos containing material shall be disposed of by double wrapping in labelled 1000 gauge polythene sheeting or bags, and transported by a licensed carrier to a landfill site correctly licensed to receive asbestos waste.

The disposal of asbestos material shall be the responsibility of the appointed contractor. As such, evidence of appropriate documentation for the consignment and disposal of asbestos waste shall be required prior to payment.

21. Disposal of Fly-Tipped waste containing Asbestos

The Council (Environmental Services) will be responsible for the arranging for the removal of fly-tipped waste, which is suspected of containing asbestos. Where large amounts of fly-tipped waste (which is suspected of containing asbestos) are reported, the Environment Agency should be consulted on the collection and disposal methods to be used. A contractor appropriately licensed for the collection of this waste will be used and the costs of this re-claimed from the offender where possible.

22. Training

All staff who may encounter asbestos during the course of their work shall be given the necessary training to be able to identify the situations in which asbestos may be present, to be able to recognise asbestos or similar suspect materials and to set out safe working practice to minimise risks to health and safety.

Persons in charge of buildings will be provided with appropriate training and information regarding accessing information from the Asbestos Register.

Induction training will be provided to all new staff falling into these groups.

22. Advice

The Head of Housing and Health or the Corporate Health and Safety Advisor can be contacted for advice relating to management of materials suspected of containing Asbestos. If in doubt the rule is to leave it alone until risk assessed by a competent person.

If during the course of normal work practices suspected asbestos-containing material is encountered, the following procedures should be followed:

23. Contractors / Employees

Action to take on the disturbance of asbestos containing materials:

1. **STOP ANY WORK**, remove and keep all persons out of the area. Where practicable close or seal or lock off the area. Do not remove any equipment or material.
2. Stop other people entering the area e.g. prepare and display a 'potential Asbestos hazard keep out' sign.
3. If there is any dust present on clothing or on the person – remove clothing and place in a plastic bag and seal – and take a shower or wash thoroughly as soon as possible. Seek advice from the Corporate H&S Advisor.
4. Inform the line manager who will report the discovery to the Facilities and Corporate Buildings Manager or the Housing and Property Services Manager who will inform the MDDC Corporate Health and Safety Advisor.
5. The Responsible Manager will arrange for the property to be inspected and for any samples or air tests to be taken if required and will keep the premises management and the Corporate Health and Safety Advisor informed. Depending on the type and extent of the asbestos contamination - a specialist licensed asbestos contractor will be required to carry out the cleanup.
6. Following laboratory analysis the responsible Manager will advise the premises management and the Corporate Health and Safety Officer of the outcome and the proposed action.
7. On completion of any repair or removal work the respective Manager will advise the premises management and the Corporate Health and Safety Advisor when the area has been made safe.

The responsible Manager will ensure that all actions including areas where asbestos has been removed and analytical reports are included in the Asbestos register and copies forwarded to premises management and the Corporate Health and Safety Advisor.

For more information on asbestos go to www.hse.gov.uk/asbestos

Where can I find out more information about asbestos?

- Information regarding asbestos can be found by visiting the Health and Safety Executive website at www.hse.gov.uk or by contacting them over the telephone on **0845 345 0055**.
- Alternatively, please contact Mid Devon District Council on **01884 233024**.



Address: Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton, EX16 6PP

Telephone: 01884 233024

Fax: 01884 234318

Email: plannedmaintenance@middevon.gov.uk

Please note: Mid Devon District Council is presenting this leaflet to tenants to help provide information about asbestos. It provides advice and information available at the time of writing which may change. It is intended for guidance only and does not provide authoritative legal advice.



For large print, audio version or other languages please call 01884 233024



Your guide to help you deal with

Asbestos in your home

- Facts about asbestos
- What should I do if I think I have asbestos in my home?
- What can be done about asbestos?
- Will Mid Devon District Council remove the asbestos?
- Common locations of asbestos
- Where can I find more information regarding asbestos?

www.middevon.gov.uk

Facts about asbestos

- Building materials containing asbestos were widely used between 1950 and 1980, particularly from 1960 onwards, as its fibres are strong and resistant to heat and chemicals.
- When asbestos is damaged it releases fibres into the air which can cause problems if breathed in.

What should I do if I think I have asbestos in my home?

- Don't panic as it is very unlikely that the levels of asbestos fibres found in the building will be harmful.
- Don't attempt to remove the asbestos lagging, spray coatings or large areas of insulation board yourself. Nobody should undertake the removal of asbestos unless they have obtained the HSE license to do so.
- If you are planning to carry out any DIY, painting or alterations (this includes drilling and sanding) and it has been confirmed your home has asbestos, please contact Mid Devon District Council for advice and guidance before proceeding with this work.
- If you are at all concerned that you might have damaged or aging asbestos, please do not hesitate to contact one of our members of staff trained in dealing with asbestos on **01884 233024**.

What can be done about asbestos?

- As a landlord, we have a legal duty to register each property that has asbestos.
- We have carried out a representative survey of all properties and identified all known locations of asbestos.
- Depending on the severity of the asbestos material found in your home, we will either repair the material usually by sealing or enclosing it, or we will remove it, especially where it is badly damaged or deteriorated.

Will Mid Devon District Council remove the asbestos?

- We will manage and regularly monitor all asbestos found in your home.
- Not all asbestos will be immediately removed. However, we will carry out a programme of removal where asbestos is found to be in disrepair and needs replacing.
- Asbestos materials in a good condition that can not readily be damaged are often best left where they are.
- The general rule for asbestos removal is: if undamaged and completely sealed, leave it alone.

The common locations of asbestos in the home



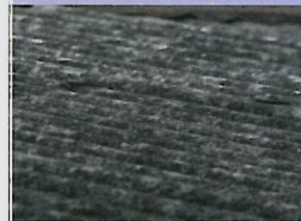
◀ Asbestos cement bath panels

- ▶ Insulation panels to the inside of the doors to warm air boiler cupboards



◀ Ceiling tiles and textured coatings

- ▶ Artex and vinyl floortiles up until 1999



◀ Asbestos cement on garage or shed roofs and wall panels

- ▶ Sprayed coatings for insulation and fire protection



◀ Asbestos cement drain pipes, gutters, soil outpipes, soffits and fascias.

- ▶ Watertanks in roof space



◀ Asbestos cement insulation boards, infill panels and partitions

Appendix 5 - Action plan

300 Surveys per annum £200 per survey, including samples	2024-2025	=	£60,000.00
	2025-2026	=	£60,000.00
Re-inspections 20% per annum	annual cost		£25,000.00
Planned Removals costs from Gwella and Wakeham 2024-2025 SOR's	2024-2025		£35,000.00
	2025-2026		35,000.00

Assumption that every property allows access

If property occupied and acm in reasonable condition leave due to prohibitive cost of decant for licensed work

Leaseholders are to be included, although MDH will need to consult with the leaseholders and have a good rationale for removal

The list of works has been based on material and priority assessment scores over 10, a single material assessment score over 5 or a medium risk level rating.

Material and Priority Assessment scores over 10

Flat 13	Cockles Rise	Crediton	EX17 3JB	First Floor	Kitchen	Insulating Board Boxings	Encapsulate and remove when void £500.00
76	Ford Road	Tiverton	EX16 4BE	Other	Loft	Panel	Survey required as refers to 74 Ford Rd
8	Ashley Close	Uffculme	EX15 3BW	Ground Floor	Store	Insulating board panel	£600.00
4	Ford Road	Bampton	EX16 9LW	First Floor	Bedroom Rear	Ceiling Boards	£1,300.00
6	Fosterlea	Cullompton	EX15 1HH	Ground Floor	Cupboard	Cement panels	£500.00
6	Fosterlea	Cullompton	EX15 1HH	Ground Floor	Bedroom Front	Cement Panel	£500.00
6	Fosterlea	Cullompton	EX15 1HH	Ground Floor	Bedroom Rear	Cement panels	£500.00
6	Fosterlea	Cullompton	EX15 1HH	Ground Floor	Lounge	Cement panels	£500.00

14	Knightswood	Cullompton	EX15 1ET	Ground floor	Family room	Panel	£1,300.00
7	Market Close	Bampton	EX16 9NU	Ground Floor	Lounge	Insulating board panel	£1,300.00
26	Prospect Way	Lapford	EX17 6QB	Ground Floor	Cupboard	Insulating board panel	£1,300.00
30	Prospect Way	Lapford	EX17 6QB	Ground floor	Lounge	Insulating board panel	£1,300.00
3	Somerville Park	Willand	EX15 2PB	Ground Floor	Kitchen	Ceiling Boards	£500.00
34	Sunnymead	Copplestone	EX17 5NQ	Ground floor	Lounge	Ceiling panel	Survey with wakeham
39	Westfield	Bradninch	EX5 4QU	First Floor	All	Ceiling	£2,500.00
39	Westfield	Bradninch	EX5 4QU	Ground Floor	All	Ceiling Lining	£2,500.00

There are 11 MA assessment scores of over 5

50	Butt Parks	Crediton	EX17 3HE	Ground Floor	External	Downpipes	Survey £200.00
10	Churchill Drive	Crediton	EX17 2DW	Ground floor	Loft space	Wall cladding	Encapsulate £1500.00
20	Brady Close	Sandford	EX17 4LQ	Ground Floor	Porch	Ceiling Boards	Survey £200.00
19	Culver Close	Bradninch	EX5 4NY	Roof	Loft space	Cement debris	Survey £200.00
11	Heggadon Close	Bradninch	EX5 4NQ	Ground floor	Store cupboard	Lining Board	Survey £200.00
7	Knightswood	Cullompton	EX15 1ET	Ground floor	External store	Ceiling panel	Survey £200.00
15	Market Close	Bampton	EX16 9NU	Ground floor	External	Roof	Survey £200.00
20	Prospect Way	Lapford	EX17 6QB	Ground Floor	Lounge	Insulating board panel	£1,300.00
Flat 122	St Andrews Estate	Cullompton	EX15 1HZ	Ground Floor	Lounge	Vent	Monitor
Flat 122	St Andrews Estate	Cullompton	EX15 1HZ	Ground Floor	Bathroom	Box riser	When void £2,000.00
13	Sunnymead	Copplestone	EX17 5NQ	Roof	Roof	Undercloaking	When renewing roof

There are 7 medium risk level scores

12	Churchill Drive	Crediton	EX17 2DW	Roof	Loft	Party wall	Encapsulate £1,500.00
83	Higher Cotteylands	Tiverton	EX16 5BL	Ground Floor	Store	Cement panels to coal store	£200.00
Flat 7	Appledore Close	Cullompton	EX15 1ER	First Floor	Lounge	No Sample	Sample survey

							required
Flat 7	Prowses	Hemyock	EX15 3QG	Garden	Bin Store	Insulating board panel	£1,300.00
43	Shortlands Road	Cullompton	EX15 1HW	Ground Floor	External	Soffit	Novus 2024 – 2025 if required
Flat 1	Wyndham Road	Silverton	EX5 4JU	Ground Floor	Store	AIB	£1,300.00
21	Yeo View	Yeoford	EX17 5HY	Roof	Roof	Felt	Survey £200.00

Communal areas

Fir Close 39 & 40	Cullompton	EX15 2PZ	Ground floor	Ceiling panels	Porch		£2,600.00
Fir Close 39 & 40	Cullompton	EX15 2PZ	Ground floor	Ceiling board	Bin store ceiling		£2,600.00
Highland Terrace 82 to 85	Cullompton	EX15 3EW	Ground floor	Ceiling panel	Porch		£2,600.00
Highland Terrace 82 to 85	Cullompton	EX15 3EW	Ground floor	Ceiling board	Bin store ceiling		£5,200.00
Prowses 1 to 11	Cullompton	EX15 3QG	Ground floor	Ceiling panel	Bin store ceiling		£2,600.00
Churchills 2 to 8 Evens	Cullompton	EX15 3QN	Ground floor	Ceiling panels	Bin store ceiling		£1,300.00
Churchills 2 to 8 Evens	Cullompton	EX15 3QN	Ground floor	Ceiling panels	Porch		£1,300.00
Prowses 12 to 18	Cullompton	EX15 3QN	Ground floor	Ceiling panel	Porches Bin Stores		£6,500.00
Siddalls Gardens 21 to 21A	Tiverton	EX16 6DG	First floor	Roof panels	roof and porch		Survey £200.00
Siddalls Gardens 22 to 22A	Tiverton	EX16 6DG	First floor	Roof panels	roof and porch		Survey £200.00
Siddalls Gardens 23 to 23A	Tiverton	EX16 6DG	First floor	Roof panels	roof and porch		Survey £200.00
Siddalls Gardens 24 to 24A	Tiverton	EX16 6DG	First floor	Roof panels	roof and porch		Survey £200.00
Boyes Close 11 & 12	Tiverton	EX16 7DB	Ground floor	Ceiling panels	Bin store ceiling		Survey £200.00
Boyes Close 14 & 15	Tiverton	EX16 7DB	Ground floor	Ceiling panels	Bin store ceiling		Survey £200.00
Boyes Close 4 & 5	Tiverton	EX16 7DB	Ground floor	Ceiling panels	Bin store ceiling		£1,300.00
Brays Close 11 to 16	Crediton	EX17 3HZ	Second floor	Soffit Board	Roof		Survey £200.00
Brays Close 23 to 28	Crediton	EX17 3HZ	Second floor	Soffit Board	Roof		Survey £200.00

Wyndham Road 1 to 11	Exeter	EX5 4JU	Ground floor	Ceiling panels	Bin store ceiling	£5,200.00
Wyndham Road 1 to 11	Exeter	EX5 4JU	Ground floor	Ceiling panels	canopy	£5,200.00
Wyndham Road 13 to 23	Exeter	EX5 4JU	Ground floor	Ceiling panels	Bin store ceiling	£2,600.00
Wyndham Road 25 to 31	Exeter	EX5 4JU	Ground floor	Ceiling panels	Bin store ceiling	£2,600.00

Appendix 6 - Asbestos Management Plan relating to a non domestic locations

The duty to manage asbestos in non-domestic premises is set out in Regulation 4 of the 2012 Regulations. The duty to management asbestos in non-domestic premises does not apply to individual council houses but does apply to all non-domestic premises like factories or shops. It can also apply to the 'common parts' of multi-occupancy domestic premises, like purpose-built flats. The common parts do not cover individual flats, but do include:

foyers and corridors

lifts and lift-shafts

staircases

roof spaces

gardens and yards

outhouses and garages

Because the duty to manage asbestos in non-domestic premises applies to the common parts of multi-occupancy domestic premises there is some overlap with the approach taken in this management plan and the specific duty to manage asbestos in non-domestic premises. However where the specific duty to manage asbestos in non-domestic premises applies the requirements of that duty must be complied with.

Although this management plan is not prepared in relation to the duty to manage asbestos in non-domestic premises It should be noted that that the Council's duty to manage asbestos in non-domestic premises requires the following site specific steps to be taken for each premises

- a) assess if there are asbestos-containing materials (ACMs) present, the amount, where they are and their condition
- b) presume materials contain asbestos unless there is strong evidence that they do not
- c) make, and keep up to date, a record or register of the location and condition of the ACMs or presumed ACMs
- d) assess the risk of anyone being exposed to airborne fibres from the ACMs
- e) write an asbestos management plan to manage the risk, put the plan into action, monitor it and review it every 12 months or sooner if necessary
- f) monitor the condition of any ACMs or suspected ACMs

g) provide information on the location and condition of the ACMs to anyone who may work on or disturb them, including the emergency services.