

Northland DHB Asbestos Management Plan

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Section 1: Introduction

New Zealand legislation requires Northland District Health Board (Northland DHB) to ensure, so far as is reasonably practicable, that asbestos within Northland DHB buildings is identified and that any risks arising from asbestos are managed to eliminate or minimise exposure.

Northland DHB is committed to ensuring a safe and healthy environment for everyone at Northland DHB owned or leased sites, including workers, patients, visitors and contractors. The Northland DHB Asbestos Management Plan sets out how we will identify, assess and control potential risks caused by the presence of asbestos and asbestos containing materials (ACMs) within our facilities.

The plan provides general guidance with an emphasis on day-to-day management, including maintenance activities, emergency repairs and minor refurbishment work. A project specific management plan will be prepared for major refurbishment or demolition works.

It is intended that the Northland DHB Asbestos Management Plan should be read in conjunction with the Northland DHB Asbestos Policy.

In producing this management plan, the following documents have been referenced:

- The Health and Safety at Work Act 2015
- The Health and Safety at Work (Asbestos) Regulations 2016
- Approved Code of Practice: Management and Removal of Asbestos 2016
- Health and Safety Executive (UK) Asbestos Essentials

Section 2: Asbestos Management Leadership

The Asbestos Management Team has been formed to strengthen and support asbestos management procedures throughout Northland DHB facilities.

Asbestos Management Team	
Facilities Management Safety & Risk Advisor District Facilities Manager	Governance
Whangarei Maintenance Manager Maintenance Controllers Project Managers, Infrastructure & Commercial Services	Operational support

The Asbestos Management Group will play a vital role when urgent decisions need to be made about building use, occupancy and lifespan due to escalated asbestos risk (see Appendix 1).

Asbestos Management Group	
Safety & Risk Advisor, Facilities Management	
District Facilities Manager	
Director, Infrastructure & Commercial Services	
General Manager (of the affected service/s)	

2.1 Key Responsibilities of the Asbestos Management Team

Facilities Management Safety & Risk Advisor

Reporting to the District Facilities Manager, the Safety & Risk Advisor is responsible for delivery of the Northland DHB Asbestos Management Plan, ensuring an integrated and coordinated approach to asbestos management across all Northland DHB sites.

District Facilities Manager

The District Facilities Manager will support and resource the Safety & Risk Advisor to deliver the Northland DHB Asbestos Management Plan, and will convene the Asbestos Management Group when urgent decisions about Northland DHB facilities need to be made.

Operational Support

Northland DHB staff who are directing work for Facilities Management or Infrastructure & Commercial Services are responsible for implementing the Northland DHB Asbestos Management Plan on their respective sites and projects.

2.2 Key Functions of the Asbestos Management Team

- Procurement of asbestos surveying, removal, assessment & analytical services
- Risk assessment to determine the risk of exposure to airborne asbestos. Things to consider include:
 - information gathered through refurbishment and management surveys and lab reports; i.e. the type of asbestos present and the current condition of the material
 - whether it is likely to be damaged or will deteriorate
 - whether it is likely to be disturbed through routine work
 - potential exposure routes
- · Implementing control measures to protect workers, patients and public
- Visually inspecting the asbestos, its location and understanding work practices
- Monitoring asbestos-related work activities

- · Maintaining the asbestos register
- Reviewing the Northland DHB Asbestos Management Plan

2.3 Asbestos Register

The asbestos register is available to view upon request by:

- workers who have worked, are working, or plan to work at the workplace, and their representatives
- any PCBU who has worked, is working, or plans to work at the workplace
- any PCBU who required, requires or intends to require work to be carried out at the workplace

The asbestos register is live and will not be printed or distributed to third parties. It can be viewed at the Facilities Management office in the presence of the Safety & Risk Advisor or the District Facilities Manager.

The Asbestos Register will be updated whenever any asbestos is discovered, removed, sealed or enclosed.

2.4 Reviewing the Northland DHB Asbestos Management Plan

The Asbestos Management Team will review and (if necessary) revise the Northland DHB Asbestos Management Plan every five years, or when:

- asbestos controls are reviewed and changed
- the plan is no longer adequate for managing the asbestos risks

Section 3: Asbestos Management Approach

3.1 General

- A complete asbestos survey of all Northland DHB buildings is to be completed by a licenced Asbestos Surveyor. The survey report will provide information on the location, amount and condition of asbestos and asbestos containing materials (ACMs).
- Where it is not reasonably practicable to remove asbestos, it will be encapsulated, and
 where it is not reasonably practicable to remove or encapsulate asbestos, it will be sealed.
 In some instances, the asbestos may be in good condition, non-friable, and isolated from
 people; in such cases, the asbestos may be left as is.
- If asbestos is to be removed and the removal work cannot be done immediately, the asbestos will be made safe until it can be removed.
- Asbestos removal work will be assessed taking into account the potential risk to people, medium to long-term plans for affected buildings, fire penetration requirements, seismic and fire egress and the following indication of asbestos priorities:
 - Exposed friable asbestos
 - Unexposed friable asbestos
 - Asbestos in a poor condition that is likely to become friable
 - Exposed non-friable asbestos
 - Unexposed non-friable asbestos
- Removal, encapsulation and sealing of asbestos will be done by appropriately qualified and experienced asbestos removal contractors; qualifications to include either a Class A or Class B asbestos removal licence, dependent on whether the asbestos is friable or non-friable.
- Sampling at Northland DHB will be carried out by a licenced Asbestos Assessor. Staff or contractors are prohibited from taking samples of suspected asbestos containing materials on Northland DHB sites, except under very limited conditions. Any exceptions must be approved by the Safety & Risk Advisor.

3.2 Personal/Respiratory Protective Equipment (PPE/RPE)

- PPE and RPE requirements will be based on an assessment of the level of risk of exposure to asbestos fibres. This includes, but is not limited to:
 - Disposable overalls, boot covers and gloves
 - Particulate filter respirators P2/P3 or P3 protection. Facilities Management will advise which level of protection is required according to the situation.

3.3 Prohibited Equipment

- The following items are prohibited for use on asbestos containing materials (ACM) at Northland DHB sites (regulation 18):
 - High pressure water sprayers
 - Compressed air
 - Power tool, broom or any other implement that causes the release of fibres into the atmosphere (except under controlled circumstances)

Section 4: Work Involving Asbestos

It is important to understand whether work involving asbestos is 'asbestos related work' or 'asbestos removal work'.

This is because some regulations only apply to asbestos-related work, and others only apply to asbestos removal work.

Figure 1 shows the types of permitted work involving asbestos and where they fit.

WORK INVOLVING ASBESTOS ASBESTOS REMOVAL ASBESTOS-RELATED WORK* - Research and analysis - Sampling and identification Licensed asbestos Unlicensed asbestos Transport and disposal - Demonstrations, education or practical training - Response to an emergency - Demolition - Firefighting - Maintenance and servicing work - Rectifying work - Display of an artefact Removing 10 m² or Any amount of Any amount or thing less of non-friable friable asbestos of non-friable or ACM - Mining asbestos and associated asbestos or ACM asbestos-contaminated - ACD associated - Any amount - Laundering asbestosdust (ACD) of ACD with removing contaminated clothing - Removing ACD not non-friable - Any amount Naturally occurring asbestos asbestos or ACM associated with the of non-friable Work carried out in removal of friable or asbestos or ACM accordance with an non-friable asbestos approved method

Figure 1 Breakdown of work involving asbestos

Note: This diagram excludes work involving asbestos-contaminated soil

and is only a minor contaminant

The level of controls and requirements are dependent on the definition of the asbestos work being carried out, which is outlined in the following sections:

- Asbestos Related Work
- Asbestos Removal Work Licenced and Non-Licenced

Section 5: Asbestos Related Work

The following are common types of work that occur on Northland DHB sites, which fall under the 'Asbestos Related Work' category:

- Sampling and identification
- Maintenance and servicing work
- Response to an emergency
- Rectifying work
- Minor disturbance of asbestos (such as cutting a small hole or hand-drilling a few holes in a cement sheet to maintain, install, reconfigure or repair a service).

These tasks will be risk assessed and evaluated on a case-by-case basis and safety controls will be put in place to minimise the potential of any fibre release. All asbestos related work must be approved by the Safety & Risk Advisor or District Facilities Manager, prior to the work commencing.

5.1 Requirements for Trades

Since a variety of PCBU's may be involved in asbestos related work at Northland DHB sites, it is important that PCBU's consult, co-operate and co-ordinate their activities with each other.

All contracted trades (including contractors, sub-contractors, consultants and project managers) shall:

- Complete the current Facilities Management Contractor Induction.
- Sign-in with Facilities Management on arrival to any Northland DHB campus and complete the required permit (risk assessment and approval).
- Consult the asbestos register prior to starting work in any building constructed prior to 2003 or in which asbestos or ACM has been identified.
- If there is any uncertainty as to whether an area may be affected by asbestos or ACM, do not proceed with work until you have consulted with the Safety & Risk Advisor (Whangarei) or the Maintenance Controller (District hospitals).
- Ensure that all workers under their control have adequate training, information and instruction to enable them to work safely in areas where asbestos or ACM may be present.
- All workers and subcontractors must be made aware of identified asbestos and ACM within the work site
- Any ACM or contaminated waste (including PPE) shall be packaged, transported and disposed of in accordance with regulation 40.
- Stop work immediately if any unidentified asbestos containing material (or suspected ACM) is discovered immediately notify the Safety & Risk Advisor (Whangarei) or the Maintenance Controller (District hospitals). See section 8.

5.2 Asbestos Identification

An important part of managing asbestos risk is the physical identification of asbestos or ACM. To this end, all identified asbestos or ACM that has not been removed will be identified through the use of floorplans and the asbestos register. Other options for identification include labelling and signage – discuss with the Safety & Risk Advisor before adding any labels or signs.

5.3 Safety Operating Procedures (SOPs)

Safety operating procedures provide workers with information on how to carry out certain asbestos related tasks safely, utilising industry knowledge and learnings. If there is an appropriate SOP available for the task, this will be discussed during the permit process.

Section 6: Asbestos Removal (Licenced)

Licenced Removal Work

Northland District Health Board will engage licenced asbestos removal contractors to undertake all asbestos removal works at Northland DHB owned and leased buildings, with the exception of minor 'non-licenced' removal work (covered in section 7).

6.1 Northland DHB Safety & Risk Advisor will:

- Provide direction on the procurement of asbestos surveying, removal, assessment & analytical services
- Review PCBU Asbestos Management Agreements before they are sent out
- Review and approve Asbestos Removal Control Plans (ARCP)
- Monitor the quality of asbestos surveying, removal, assessment and analytical services
- Ensure the asbestos register is updated on completion of works

In the absence of the Safety & Risk Advisor, the District Facilities Manager or designated approver (e.g. an Asbestos Assessor) will approve asbestos removal work.

6.2 Northland DHB Project Managers will:

- Prepare a scope of works for any asbestos remediation, removal or demolition work, using the prescribed form, and submit to the Safety & Risk Advisor for evaluation and scheduling
- Coordinate capital site works or refurbishment projects according to the Northland DHB Asbestos Management Plan and the 'project specific' PCBU Asbestos Management Agreement
- Engage with internal and external stakeholders to plan and coordinate work activities involved in the removal project whilst allowing the hospital to maintain appropriate levels of service delivery
- Ensure that authorisation has been obtained from the Safety & Risk Advisor prior to any asbestos removal or remediation works commencing
- Ensure that the following persons are informed that asbestos removal work is to be carried out at the workplace, and when the work is to commence:
 - Workers and any other persons at the workplace; and
 - The person who commissioned the asbestos removal work
 - Any PCBU at or in the vicinity of the workplace; and
 - Anyone occupying premises in the immediate vicinity of the workplace
- Ensure that a clearance inspection is carried out by a licenced asbestos assessor
- Pass on any surveys, testing results or clearances as they come to hand to the Safety & Risk Advisor as soon as possible
- Disclose any new information concerning asbestos that may change the agreed scope of works to the Safety & Risk Advisor, and await advice on how to proceed

6.3 The licenced Asbestos Removal Contractor will:

- Read (discuss any changes) and sign the PCBU Asbestos Management Agreement
- Provide an Asbestos Removal Control Plan (ARCP) for review prior to the start of any asbestos removal works

- Ensure that no removal work activities proceed until the ARCP has been approved by the Safety & Risk Advisor, or in their absence, the District Facilities Manager or a designated approver
- Provide respirator fit testing records for all workers involved in the asbestos removal project
- Carry out the required notification to WorkSafe NZ, as per section 6.4
- Ensure that removal works are undertaken by, and under the supervision of, licenced asbestos workers (Class A or Class B as appropriate)
- Erect appropriate signage and barriers (regulation 37), limit access to the removal area (regulation 38) and provide adequate decontamination facilities (regulation 39)
- Ensure that a copy of the ARCP is kept onsite and available for inspection throughout the removal works (regulation 33)
- Ensure that training records for the workers are kept onsite and available for inspection throughout the removal works (regulation 30)
- Identify any remaining asbestos not able to be removed, as per section 5.2.
- Surveys, test results (air monitoring or sample analysis) and clearances are to be submitted to the Safety & Risk Advisor as soon as possible.
- Ensure that any ACM or contaminated waste (including PPE) is packaged, transported and disposed of in accordance with regulation 40. Provide disposal receipts to the Safety & Risk Advisor

6.4 Notification to WorkSafe

Notice must be given in writing, using the notification form on the WorkSafe website, as required by the Health and Safety at Work (Asbestos) Regulations 2016 (regulation 34).

- Notification must be given to WorkSafe at least 5 days before work commences.
- If the asbestos requires immediate removal, as defined by regulation 34(2), notice must be given to WorkSafe immediately by telephone (0800 030 040) and in writing within 24 hours of the call.

6.5 Air Monitoring

The requirement for air monitoring during any licenced removal work shall be determined in consultation between Northland DHB, the asbestos assessor and the removal contractor and will be detailed in the asbestos removal control plan (ARCP). Any air monitoring shall be carried out in accordance with the asbestos regulations.

6.6 Completion of Asbestos Removal

Upon completion of the asbestos removal works and upon receipt of the clearance inspection certificate verifying that the area is safe to reoccupy, the Safety & Risk Advisor will ensure that the asbestos register is updated with the relevant information.

Section 7: Asbestos Removal (Non-Licenced)

If the task involves removing less than 10m2 of non-friable asbestos containing material, the works shall be considered to be non-licenced removal works (regulation 27). These activities may be undertaken by a competent person, under Northland DHB permit-to-work conditions.

Example:

- Minor removal of broken cement sheeting can be carried out as non-licenced work (i.e. storm repairs or impact damage). Any significant removal of asbestos cladding should be classed as licenced removal work.

Conditions:

The knowledge, training, qualifications and experience of all worker/s involved in the work will be assessed.

Permits for this type of work require approval from the Safety & Risk Advisor or the District Facilities Manager.

The competent person shall be responsible for ensuring that the ACM is removed and disposed of in accordance with relevant legislation and asbestos regulations and the conditions outlined in the permit. This includes carrying out the work in accordance with appropriate Northland DHB safety operating procedures (SOPs) and in full consultation with the Safety & Risk Advisor.

Under the asbestos regulations, no formal clearance inspection or certificate is required at the completion of non-licenced work.

Section 8: Emergency Procedure - Damaged ACMs / Unidentified Asbestos

Where asbestos containing materials (ACMs) have been damaged, or suspected deterioration is identified, or previously unidentified asbestos or ACM is encountered during works, the following emergency procedure will be initiated:

- Secure the area affected ensuring no access is permitted
- Notify the Safety & Risk Advisor or District Facilities Manager as soon as possible, they
 will provide advice and guidance. This may include, but is not limited to; inspecting the
 damage or material/s reported, arranging further testing or professional advice,
 determining associated remedial works, reviewing operational impacts on hospital
 services, suggesting alternate arrangements
- If a potential exposure risk exists, the area shall be covered, sealed or dust suppression measures implemented
- Maintain controlled access to the area until such time as formal clearance has been confirmed
- Maintain communication with staff and other relevant parties, providing updates as necessary to ensure the access arrangements are not breached

Appendix 1 Escalations - Asbestos Management Group

The Asbestos Management Group (AMG) will be convened by the District Facilities Manager when urgent decisions need to be made due to escalated asbestos risks, such as:

- A licenced asbestos surveyor recommends immediate closure of a building and/or evacuation of staff due to high contamination/exposure levels.
- When the occupancy and/or activity (use) of a building is such that it will likely cause
 disturbance to high risk friable asbestos and decisions need to be made about future
 building use, occupancy, lifespan etc.
- When an emergency event occurs (i.e. building collapse, fire) in a building where asbestos or asbestos containing materials are known to be present

Appendix 2 Project Work Initiation Process (Asbestos)

This flow chart summarises the steps which should be undertaken by anyone initiating project work at Northland DHB (including third party contractors such as Health Alliance) to ensure we capture any potential asbestos risk.

