

To: Jo Flaherty

From: Dan Collins

Company: London Square

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Date: 21 July 2023

Project No. 409.009917.00001

RE: Health and Safety During Asbestos Removal

The requirement to manage asbestos risk at Holloway Park stems from the fact that asbestos fibres were identified in some soil samples during a site investigation undertaken in 2021 prior to any demolition works starting. At a later stage, once work had commenced at the site, visible asbestos (fragments of asbestos) was also identified.

The above is a very common situation on a Brownfield site. While SLR considers the asbestos risk at the site to be relatively low, the presence of asbestos at the site means that compliance with the Control of Asbestos Regulations (CAR 2012) is required while groundworks are undertaken.

CAR 2012 applies when asbestos fibres are present at above a “trace” concentration and when more than “isolated and random” fragments of visible asbestos are present. CAR 2012 applies here because a “trace” concentration of asbestos is defined as <0.0001% asbestos by mass. This is a very low concentration and, in fact, is lower than the threshold that most laboratories test to. This in turn means that CAR 2012 applies to many Brownfield sites and, in fact, on the majority of sites at which SLR undertakes site investigations.

CAR 2012 contains a number of Regulations that must be complied with where asbestos has been identified on a construction site. These regulations cover issues such as:

- Legal and licensing issues – for example are the works licensable to the HSE and is a Licensed Asbestos Removal Contractor (LARC) required;
- Providing information to site works and ensuring staff have the correct training and protective equipment;
- Preventing exposure to asbestos during the works;
- Using control measures to prevent the spread of asbestos and the release of asbestos fibres; and
- Storage and disposal of any asbestos identified;

The way we ensure that the site and staff comply with the above (and other) Regulations is by producing a very detailed Asbestos Risk Assessment and Plan of Work. In this case this document has been produced by SLR Consulting and it sets out how the site will manage asbestos risks to humans both on and off-site.

Of most concern to local residents/businesses is often how a site will prevent the release of asbestos fibres over the boundary of the site. There are many ways in which we achieve this, including the following:

- Making sure staff have the correct training and, in this case, the use of a specialist contractor (a LARC);
- Undertaking a continual asbestos Watching Brief so that when asbestos is identified it is immediately dealt with;
- Having designated working areas where asbestos has been identified so that staff are protected and areas of the site are not cross-contaminated;
- Using suppression (for example water or certain chemical suppressants) to reduce the likelihood of asbestos fibre release;
- Using the correct PPE and RPE, which often means site staff are required to wear disposable overalls and half face masks; and
- Preventing the release of asbestos fibres by minimising excavator drop heights and avoid the double-handling of materials where possible.

All of the above are techniques used at Holloway and, while some of the above can appear quite alarmist to the casual observer (particularly site staff wearing full asbestos PPE), in fact, given the requirements of CAR 2012 it is standard practice.

In terms of proving that techniques like the above actually work (i.e. they prevent asbestos fibres from escaping from the site) asbestos air monitoring is also undertaken. Asbestos fibre air monitoring is undertaken for two main reasons:

1. To demonstrate that risks to on-site works are within acceptable limits;
2. To demonstrate that asbestos fibres are not being released over the boundary of the working area (and therefore over the boundary of the whole site).

Asbestos air monitoring at Holloway is undertaken as a combination of:

1. Air monitors around the perimeter of the working area (where asbestos removal takes place in a discreet area) or site boundary (if asbestos removal work was to take place across the wider site); and
2. Personal air monitors (for example within the cab of excavators).

The HSE sets guidance in relation to limits of asbestos fibres in air and the air monitoring is undertaken on this basis. The HSE sets the legal Control Limit of asbestos in air at 0.1 asbestos fibres per cubic centimetre (f/cm³) of airborne fibres averaged over a four-hour period. This is the same as 0.1 fibres per millilitre (f/ml) of air. At Holloway Park this means that the asbestos fibre air monitoring must demonstrate that asbestos in air is present at less than 0.1 f/ml over a four-hour period.

To make sure the site can achieve the above we actually test the air to a much lower threshold than 0.1f/ml. The air monitors placed at the boundary of the site recorded the actual amount of asbestos present in air much lower (up to 20 times lower in most cases) than the legal Control Limit.

In summary of the above, although risks due to the presence of asbestos at Holloway Park are considered to be relatively low, there is a requirement to comply with CAR 2012. How this is achieved is set out in a dedicated risk assessment. Asbestos air monitoring is undertaken to ensure that the legal Control Limit is not exceeded, however in reality the number of fibres recorded are much less than the Control Limit and, in fact, below the limit of quantification.

