



**Three Rivers District Council**

# **Asbestos Management Plan**

Rickmansworth Aquadrome  
Frogmoor Lane  
Rickmansworth  
WD3 1NB

RSK Report Number: 1472992 (00)

**September 2023**

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## 1 INTRODUCTION

### 1.1 INTRODUCTION

RSK Asbestos has been instructed by Three Rivers District Council ('the Client') to prepare this Asbestos Management Plan (AMP) for Rickmansworth Aquadrome, Frogmoor Lane, Rickmansworth, WD3 1NB ('the Site'). The Site comprises 41 hectares (101 acres) public park and Local Nature Reserve. It is owned and managed by Three Rivers District Council. There are three lakes, Batchworth, Bury and part of Stockers Lake, which were created in the 1920s for gravel extraction that was partly used for the building of the old Wembley Stadium.

Batchworth Lake is used for water skiing and Bury Lake is used by Bury Lake Young Mariners for sailing and canoeing. There is a large car park; café and children's play area. A full list of buildings and site users can be found in Section 3.3. Its boundaries are the River Colne to the north, the Grand Union Canal to the east and south with Stocker's Lake nature reserve to the west.

The history of the in-filing of the lake areas or source of the asbestos contamination is unknown; however, it is believed that there are potentially significant quantities of buried asbestos cement, textile and asbestos insulating board (AIB) in the ground at the Aquadrome.

RSK Asbestos were instructed to undertake a Management Survey to the perimeter of Batchworth Lake, Bury Lake and the car park area to determine the extent (if any) of asbestos debris present. The survey identified a mixture of asbestos cement (AC) debris and textile debris, with some areas having a higher concentration of debris, the survey also identified locations where buried asbestos cement was exposed and protruding through the soil (hotspots). An additional site walkover with RSK Asbestos, Three Rivers District Council representatives and the Grounds Maintenance Manager also identified additional locations, highlighted by the Grounds Maintenance Manager. A large area of extensive buried and exposed debris was highlighted by the grounds maintenance manager and was located outside the scope of the original survey (adjacent to the canal and picnic area). Subsequently, ACM debris was reported in the picnic area, which was identified as AC and AIB debris.

Due to the Grounds Maintenance Managers' knowledge of the site the presence of asbestos in several areas were identified which were outside the original survey scope, once identified these areas have been remediated. **The Aquadrome site is therefore presumed to contain ACMs below ground throughout and the entire site treated as a no dig zone.**

This AMP is based on the 2022 Management Survey Register and findings, subsequent sampling, site walkovers with the Client and known site history.

A copy of the Three Rivers District Council Asbestos Policy is included in Appendix B.

## 1.2 AIMS AND OBJECTIVES

Under the Health and Safety at Work etc Act 1974, employers have a duty to ensure, so far as is reasonably practicable, the health, safety and welfare at work of their employees, along with having certain duties towards others who may be affected by their activities, such as contractors carrying out work at their sites.

The Control of Asbestos Regulations 2012 detail requirements with respect to working with asbestos. Regulation 4, the 'duty to manage asbestos' entails the identification and ongoing management of asbestos-containing materials in non-domestic properties.

Three Rivers District Council is committed to securing the health and safety of their employees and members of the public using the site for recreational purposes. This Asbestos Management Plan has been prepared to manage the risk associated with asbestos materials at the Site; prevent exposure and the spread of asbestos; and ensure compliance with relevant legislation.

The presence of an ACM does not in itself constitute a danger; however, the ACM may pose a hazard if disturbed or damaged and must be treated accordingly. The primary purpose of this Management Plan therefore is to ensure that ACMs are not disturbed, except in a controlled manner and during a removal process.

The Management Plan includes details on how Three Rivers District Council intends to:

- protect those working and visiting the site from ACMs.
- protect those working on the site from ACMS.
- effectively control any works likely to affect ACMs.
- identify and categorise ACMs, and manage hazards based upon prioritisation and assessment of the risk that they present.
- monitor and maintain the condition of identified ACMs that are assessed as being able to be left in-situ; and
- remove ACMs where they present an actual perceived risk to health, via a prioritised programme of remediation.

## 1.3 LEGISLATION AND GUIDANCE

### Legislation

- **The Health and Safety at Work Etc. Act 1974:** This is the parent legislation providing the framework for all subsequent legislation in this area.
- **Workplace (Health, Safety and Welfare) Regulations 1992:** These regulations require employers to maintain workplace buildings so as to protect occupants and workers.
- **The Management of Health & Safety at Work Regulations 1999:** These regulations address Health and Safety issues specifically in the workplace, affecting the workforce and third parties. This is where the requirement for risk assessment is set out.
- **The Control of Asbestos Regulations 2012:** These regulations are wider than just the workplace. They prescribe those organisations must have a management plan.
- **The Construction (Design & Management) Regulations 2015:** These regulations are not specifically about asbestos but set out regulations about the management of construction projects and communication of risk.

### Guidance

- **Approved Code of Practice (ACoP) L143 Managing and Working with Asbestos, 2014:** The Regulations set out your legal duties and the ACOP and guidance give practical advice on how to comply with those requirements. The Regulations give minimum standards for protecting employees from risks associated with exposure to asbestos.
- **HSG 264 Asbestos: The Survey Guide:** Surveying, Sampling and assessment of Asbestos Containing Materials. This guide replaces and expands upon Methods for the Determination of Hazardous Substances (MDHS) 100.
- **HSG 227 A Comprehensive Guide to Managing Asbestos in Premises:** guidance aimed at people who have a duty to manage the risks from asbestos-containing materials in the premises, (i.e., building owners, tenants and anyone else who has any legal responsibilities for workplaces).
- **HSG 210 Asbestos Essentials:** guidance aimed at all workers who may come into contact with asbestos, including electricians, builders, plumbers, carpenters etc. It will be useful to employees, the self-employed and managers. It uses a series of task sheets, with over 100 full colour photos and illustrations, to describe 'good practice' for non-licensed tasks and covers the action needed to reduce exposure to an adequate level.

- **HSG 247 Licensed Contractors Guide:** useful to contract awarding bodies or others with asbestos-management duties. Guidance for licenced work with (either repair or removal of) asbestos-containing materials (ACMs), those supervising such operations and those with an ancillary licence or providing training on asbestos.

#### **Internal Three Rivers District Council document**

- Management of Asbestos Policy

The Health & Safety at Work Act 1974 sets out the duties of employers, the self-employed and employees. Employers must ensure, as far as is reasonably practicable the health, safety and welfare at work of all their employees, including providing a safe place of work and safe system of work, along with adequate information, instruction and training. Employers must also ensure, as far as is reasonably practicable, that work is carried out in such a way that people who are not employees are not exposed to risks to health or safety.

Employees have responsibilities in that they must cooperate with the employer with regard to health and safety and must take reasonable care for their own health and safety and that of other people that may be affected. The self-employed have responsibilities both of the employer and the employee.

Regulation 4 of the Control of Asbestos Regulations 2012 places a duty to manage asbestos in non-domestic premises upon the duty holder of the site.

The definition of premises in the Health and Safety at Work Act is taken to include “any place”. This is taken for practical reasons to include any building, together with any land within the curtilage, including any outbuildings, occupied by a business or public undertaking. Furthermore, HSE document INDG24415, Workplace health, safety, and welfare: A short guide for managers, states that “‘Premises’ - means any place including an outdoor place.”

The aims of the duty to manage, and the Control of Asbestos Regulations as a whole, are to prevent (or where it cannot be prevented, to reduce to as low as is reasonably practicable) exposure to asbestos and to prevent (or again where it cannot be prevented to reduce to as low as is reasonably practicable) the spread of asbestos.

The duty to manage asbestos comprises the following:

- Identifying the location, type and condition of asbestos containing materials at the site (or alternatively, assuming that asbestos is present).
- Assessing the risk that these materials pose and carrying out any required remedial actions.
- Designing and implementing a plan to manage the ongoing risk, including:
  - Ensuring that asbestos materials are maintained.
  - Carrying out remedial actions as appropriate.

- Ensuring all construction works carried out at the site are managed and controlled.
- Ensuring information is provided to those who require it; and
- Putting in place procedures for incidents and emergencies.

The asbestos management plan is designed to implement Regulation 4 'the duty to manage' requirement and all other requirements of the Control of Asbestos Regulations 2012.

The Health & Safety Executive Approved Code of Practice & Guidance L143: Managing and working with asbestos provides practical advice on how to comply with the Control of Asbestos Regulations 2012. Following this advice is not compulsory and a person may choose alternative methods. However, the Code has a special legal status; if a person is prosecuted for breach of health and safety law, and it is proved that they did not follow the relevant provisions of the Code, they will need to show that they have complied with the law in some other way, or a Court will find them at fault.

The management of asbestos risks during construction projects will also fall under the provisions of the Construction, Design and Management Regulations 2015. The definition of 'construction' under the CDM Regulations 2015 is extremely wide-ranging and as an example includes: works of redecoration or maintenance; through to major construction or demolition.

In addition, asbestos waste is subject to specific regulations: the Hazardous Waste Regulations 2005. With regard to asbestos, waste is classified as special if:

- Asbestos content is at or above 0.1% weight by weight: or
- It has visible asbestos content.

Asbestos waste must be contained, labelled, transported and disposed of properly and must not be mixed with non-asbestos waste.

## 1.4 ASBESTOS MANAGEMENT STRATEGY

Rickmansworth Aquadrome is a 41-hectare public park and Local Nature Reserve in Rickmansworth in Hertfordshire, adjacent to the River Colne and Grand Union Canal.

The Aquadrome is used as a public recreation area and includes use by several leisure organisations; Batchworth Lake is used for water skiing and Bury Lake is used by Bury Lake Young Mariners for sailing and canoeing. It is also sometimes hired out for public functions such as the annual Canal Festival.

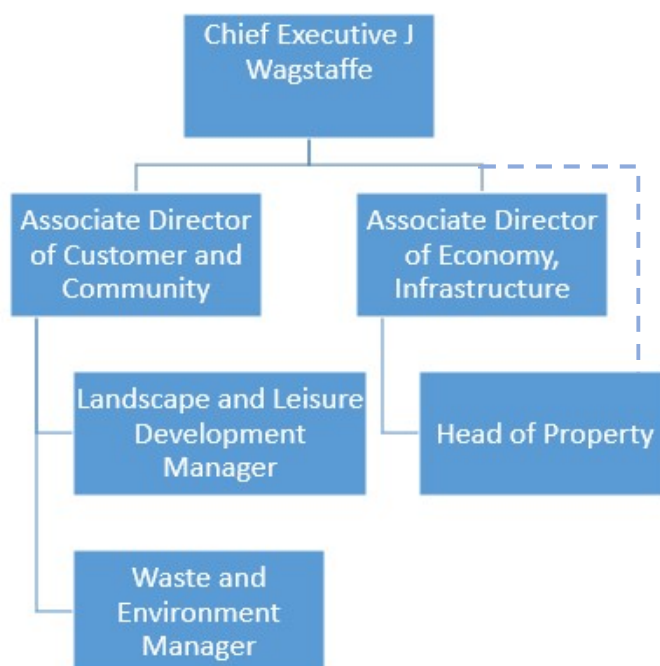
The approach for managing asbestos at the site comprises the following steps:

- Presume ACMs below ground level throughout the site and manage the site as a no dig zone, make all asbestos information available at the Grounds Maintenance office.
- Assess the risks that these materials pose and identify and implement actions to reduce the risks to an acceptable level.
- Put in place measures to manage the risk from asbestos containing materials arising from the normal use of the site.
- Put in place procedures to manage maintenance and construction works at the site, carried out by Three Rivers District Council in-house personnel and any external contractors.
- Put in place procedures to plan and carry out deliberate works involving disturbance of asbestos containing materials.
- Put in place procedures for the ongoing monitoring of the site for exposed asbestos containing materials.
- Put in place procedures for managing incidents and emergencies such as the uncontrolled disturbance of identified or suspected asbestos containing materials or the observation of additional materials suspected of containing asbestos that have not been previously identified.
- Assign and detail responsibilities to personnel.
- Provide training to employees.
- Ensure that external contractors working at the Site are adequately trained and competent; and
- Review this management plan on a routine basis.

## 2 ROLES AND RESPONSIBILITIES

Three Rivers District Council is the 'Duty holder' as defined within Regulation 4 of the Control of Asbestos Regulations (CAR) 2012 and is responsible for maintaining the AMP.

The varied use of the Aquadrome means there are shared responsibilities between the Property and Customer and Community (inc. Leisure and Grounds) departments of the council. The below organisational chart identified those responsible for compliance within the council:



The master version of the AMP resides with the Associate Director - Customer and Community who controls this document with the Head of Property responsible for its maintenance and update.

Three Rivers District Council main responsibilities with respect to ACMs are outlined below:

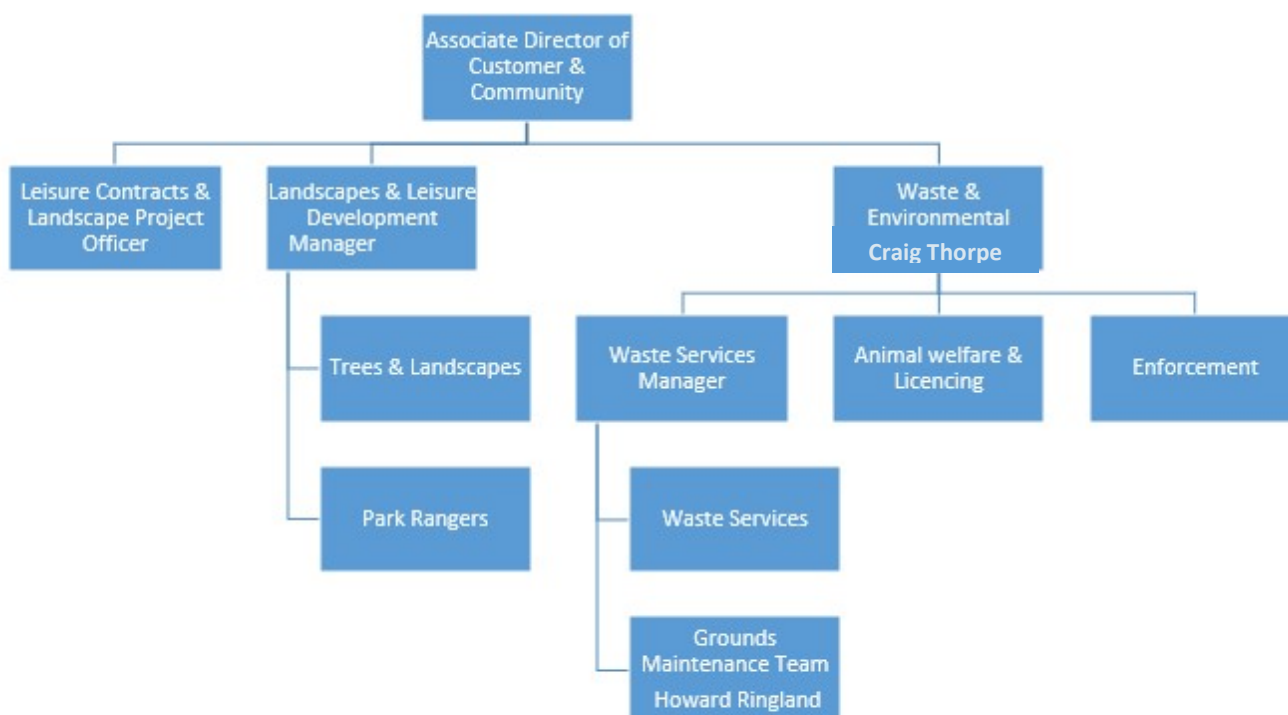
- take reasonable steps to locate and identify the presence of ACMs.
- carry out a risk assessment of ACMs in order to set priorities for management.
- produce, implement and review, at regular intervals, an AMP for the site.
- monitor the implementation of the AMP to ensure that working arrangements and provisions of financial, technical, human and other resources are suitable and sufficient to meet its requirements.
- ensure all works on asbestos containing materials are undertaken following regulations, Health and Safety Executive (HSE) guidance, industry standards and best practise.

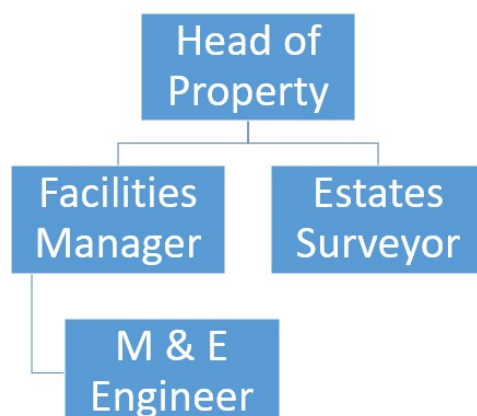
- ensure that all asbestos related information is issued to all personnel, contractors and persons who may potentially disturb ACMs during their on-site activities and informed that the site is managed as a no dig zone.
- ensure all records are updated from works done on ACMs, including monitoring records and retain for compliance monitoring in accordance with Three Rivers District Council management system processes.
- ensure procedures are followed for the monitoring of ACMs or presumed ACMs.
- train all personnel, where required, to ensure that they are competent to fulfil the requirements of their roles and responsibilities.
- Ensure relevant Project Managers review and authorise all asbestos works Risk Assessment & Method Statements (RAMs) prior to instruction.

## 2.1 DELEGATED DUTYHOLDER (COMMUNITY SERVICES & PROPERTY)

A number of Three Rivers District Council duties under Regulation 4 of CAR 2012 have been delegated to the Landscapes and Leisure Development Manager and Head of Property, who have the day-to-day management responsibilities for CAR 2012 compliance at the site including Leisure and Grounds/ Landscape.

The below organisational chart identifies the site occupiers/ users within Community Services:





Leisure and Landscapes and Property Services have respective duties as delegated duty holders. These duties include:

- the implementation of the AMP and associated Three Rivers District Council policy.
- updating the Asbestos Management Site Map for the property.
- presume materials contain asbestos unless there is evidence not to do so.
- providing advice and ensuring suitable training is given to appropriate staff.
- monitoring the implementation of the AMP to ensure that working arrangements and provisions of financial, technical, human, and other resources are suitable and sufficient to meet its requirements.
- ensuring that site walkovers are conducted and inspected, as necessary to monitor the grounds for any visual surface ACMs.
- make readily available all relevant asbestos information to personnel, contractors and visitors, to enable them to effectively manage the risk of asbestos exposure on the site under their control, by providing contractor induction and completing the Asbestos Permit to Work.
- ensuring that all personnel within their control, including contractors and visitors are fully informed of any potential asbestos hazards in the areas they work and visit and reviewing risk assessments received.
- identifying training requirements for all personnel under their control, to ensure that they are competent to fulfil the requirements of their roles and responsibilities, see Section 3.4.
- assisting and advising staff and contractors, wherever possible, to enable them to meet their delegated responsibilities under this AMP; and
- ensuring that any party or staff involved in working with asbestos are competent and are complying with all legislation and health and safety advice regarding all aspects of asbestos work.

## **2.2 SITE BASED DUTYHOLDER (GROUNDS MAINTENANCE MANAGER)**

A number of the council's duties under Regulation 4 of CAR 2012 have been delegated to the Grounds Maintenance Manager, who has the day-to-day management responsibilities for CAR 2012 compliance at the Aquadrome. These duties include:

- make readily available all relevant asbestos information to personnel, contractors and visitors, to enable them to effectively manage the risk of asbestos exposure on the site under their control, by providing contractor induction and completing the Permit to Work, found in Appendix C and outlined in Section 3.
- ensuring that all personnel within their control, including contractors and visitors are fully informed of any potential asbestos hazards in the areas they work and visit and that the site is managed as a no dig zone.
- identifying training requirements for all personnel under their control, to ensure that they are competent to fulfil the requirements of their roles and responsibilities.
- assisting and advising staff and contractors, wherever possible, to enable them to meet their delegated responsibilities under this AMP; and
- monitoring the grounds and reporting any incidents or suspect ACMs to the Waste & Environment Manager.

## **2.3 PROJECT MANAGERS**

A number of management personnel from either the Property Team or Customer and Community Team, may procure and manage maintenance, refurbishment or project work at the site or manage reactive remedial works. As part of any project or refurbishment work the delegated project manager will assume the following duties and reference should be made to the procedures in Section 6.3 of this AMP:

- take reasonable steps to locate and identify the presence of ACMs.
- make readily available all relevant asbestos information to personnel, contractors and visitors, to enable them to effectively manage the risk of asbestos exposure on the site under their control, by providing contractor induction and completing the Asbestos Permit to Work.
- ensuring that any party or staff involved in working with asbestos are competent and are complying with all legislation and health and safety advice regarding all aspects of asbestos work.
- identifying training requirements for all personnel under their control, to ensure that they are competent to fulfil the requirements of their roles and responsibilities.
- assisting and advising staff and contractors, wherever possible, to enable them to meet their delegated responsibilities under this AMP.
- review and authorise all asbestos works Risk Assessment & Method Statements (RAMs) prior to instruction.

- ensure all works on asbestos containing materials are undertaken following regulations, Health and Safety Executive (HSE) guidance, industry standards and best practice; and
- ensure all records from works done on ACMs are retained for compliance monitoring and provided to the Head of Property to update the site asbestos register and Asbestos Management Site Map.

## **2.4 TENANTS**

It is understood that there are tenants within the Aquadrome occupying premises on a mixture of tenancy agreements. These are detailed in Section 3.3.

### **FRI Lease Tenants**

Those with FRI leases are therefore considered to be the duty holder in their demise, by virtue of their responsibilities within the lease. In accordance with CAR 2012, as the tenant has shared responsibility with Three Rivers District Council Property Team, they share a duty to cooperate and share information with the ultimate duty holder (the Council).

Tenants with duty holder responsibilities should be assessing the risk of ACMs, monitoring the condition of ACMs in their demise, have appropriate procedures to prevent any uncontrolled works or disturbance of ACMs, repairing or removing ACMs in poor condition, and undertaking Refurbishment/Demolition Surveys prior to any works in their demise, prior to any works on the fabric of the property.

The tenants should provide to the main duty holder, copies of; a) copies of re-inspection or ACM condition monitoring records, b) appropriate refurbishment or demolition asbestos surveys within their demise; and c) copies of any relevant documentation if any ACMs removed or remediated within the tenant's demise, this should include Plan of Works, ASB5 notification documentation, air monitoring certificates, Risk Assessments & Method Statements (RAMS) and hazardous waste disposal records, in accordance with CAR 2012, if applicable.

### **IRI Lease Tenants or Licensees**

Those tenants or licensees where Three Rivers District Council are the duty holder. In accordance with CAR 2012, as the tenant or licensee has a duty to cooperate and allow access and the duty holder has the responsibility to share information with the ultimate duty holder the tenant/licensee.

The Council, as duty holder should assess the risk of ACMs, monitoring the condition of ACMs, implement appropriate procedures to prevent any uncontrolled works or disturbance of ACMs, repairing or removing ACMs in poor condition, and undertake Refurbishment/Demolition Surveys prior to any works in their demise, prior to any works on the fabric of the property.

The Council will save copies of; a) copies of re-inspection or ACM condition monitoring records, b) appropriate refurbishment or demolition asbestos surveys within their demise; and c) copies of any relevant documentation if any ACMs removed or remediated within the tenant's demise, this should include Plan of Works, ASB5 notification documentation, air monitoring certificates, Risk Assessments & Method Statements (RAMS) and hazardous waste disposal records, in accordance with CAR 2012, where applicable.

## **2.5 EMPLOYEES**

Employee duties include:

- compliance with their obligations as set out in the Three Rivers District Council asbestos policy.
- any person that suspects an ACM is exposed above ground should follow the procedure set out in Section 9; and
- avoidance of any activity that may disturb or damage ACMs.

## **2.6 GENERAL CONTRACTORS, SUB-CONTRACTORS**

All appointed contractors and subcontractors are responsible for the following items:

- submitting RAMs to the relevant Project Manager employed by Three Rivers District Council for review and authorisation, prior to ANY works. Three Rivers District Council will then approve and save/upload documents onto the HBI management system and saved in the electronic shared folder (X:\10\_Major\_Projects\_&\_Property\05\_Estate\_Information\Facilities Management\Asbestos).
- complying with current legislation and associated Approved Codes of Practice (ACoPs) and Guidance.
- adhering to the AMP, and any other related procedures.
- identifying training requirements for personnel under their control (including mandatory asbestos awareness), to ensure that they are competent to fulfil the requirements of their roles and responsibilities.
- reviewing the Asbestos Register before commencing works and carrying out a risk assessment to establish the risk associated with potential ACMs in the property.
- fully communicating with all personnel who may be affected about the location of, and risk associated with any ACMs in the property; and
- the immediate cessation of works if suspected ACMs are discovered and reporting to relevant Project Manager employed by Three Rivers District Council and the duty-holder for advice/action.

## **2.7 ASBESTOS REMOVAL CONTRACTORS**

Should there be a need to remove or disturb any ACMs on the site, asbestos removal contractors are responsible for the following items:

- complying with current legislation, associated Approved Codes of Practice (ACoPs) and Guidance, the AMP and any other relevant procedures.
- attending site in advance of works to assess and agree the applied rates against an asbestos remedial works specification.
- raising any issues relating to the health and safety aspects or additional project costs.
- ensuring that all asbestos removal works are carried out in strict accordance with the Control of Asbestos Regulations (CAR) 2012 and its supporting ACoP L143 Managing and working with asbestos and including any subsequent revisions to these documents.
- carrying out enclosures and removal in accordance with HSG 247 - Asbestos: The Licensed Contractor's Guide.
- providing a plan of work to the relevant Three Rivers District Council Project Manager (duty-holder), including details of project resources, timetable and agreed emergency procedure.
- providing Statutory Notices, where required, to the relevant Statutory Authority prior to commencing asbestos works.
- regularly inspecting the work environment, and reporting immediately any defects to Three Rivers District Council as the duty-holder, and where instructed rectifying the defect; and
- providing copies of notification and consignment notes and other relevant documentation with final accounts to Three Rivers District Council.

In addition, all contractors are responsible for compliance with terms and conditions set out by their appointment contract with Three Rivers District Council.

### **3 ASBESTOS MANAGEMENT ONSITE**

The 'site' is owned by Three Rivers District Council and therefore the Council is responsible for the management of ACMs at the site as the duty holder.

The site comprises 41 hectares (101 acres) public park and Local Nature Reserve. It is owned and managed by Three Rivers District Council. There are three lakes, Batchworth, Bury and part of Stockers Lake which were dug in the 1920s for gravel that was partly used for the building of the old Wembley Stadium.

Batchworth Lake is used for water skiing and Bury Lake is used by Bury Lake Young Mariners for sailing and canoeing. There is a large car park, café and numerous buildings at the site. Its boundaries are the River Colne to the north, the Grand Union Canal to the east and south and Stocker's Lake nature reserve to the west.

The history of the in-filing of the lake areas or source of the asbestos contamination is unknown; however, it is believed that there are potentially significant quantities of buried ACMs in the ground at the Aquadrome.

#### **3.1 PLANS**

The Asbestos Management Site Map has been developed in GIS format, so it is an updateable resource to identify locations within the site that have buried hotspots of ACMs which have been remediated. This will be used as the asbestos register and form an integral part of the management strategy for the site.

#### **3.2 ASBESTOS DATA ARCHIVE**

The Asbestos Management Survey and subsequent emergency remedial actions have been undertaken at the site. A summary of the historical asbestos survey and management actions are provided below and further details on remedial works undertaken can be found in Section 5.3:

- RSK Asbestos Management Survey, 1472992, undertaken in June 2022.
- RSK Asbestos Background and Personal air monitoring, undertaken in June 2022.
- RSK Asbestos & KPL Environmental Ltd Phase 1 urgent remedial works, undertaken in July 2022.
- RSK Asbestos & KPL Environmental Ltd hand pick of picnic/ play area surface debris, undertaken in September 2022.
- RSK Asbestos & KPL Environmental Ltd Phase 2 remedial works, comprising the site wide hand pick of surface debris, with section closures to the public to facilitate the hand pick, undertaken in March 2023.

- RSK Asbestos & KPL Hand pick of cement debris West of Water Ski Club, Batchworth Lake, undertaken in April 2023.
- Fallen tree/ Root ball exposed with ACMs in root ball – identified near the Water Ski Club, which was cut back, to reinstate the root ball, works were undertaken as non-licensed with clean and hand pick of any surface debris remaining. Documents awaited from Grounds Maintenance team.

This archive data is held electronically in the HBI management system, and a hard copy will remain on site as reference, in the Grounds Maintenance Office.

It is essential that all available information and records regarding asbestos at the site are maintained, updated and distributed as necessary to all relevant personnel, in order to provide the most accurate information possible so that they are able to identify and manage asbestos hazards during their day-to-day activities.

The asbestos information for the site is based on knowledge and previous surveys, however once all surface remedials have been undertaken, **the site will be managed on a presumptive basis that there are ACMs buried beneath the site** and will be managed on a reactive basis.

Therefore, an asbestos register in the traditional sense, will not be practical, however the Asbestos Management Site Map detailed in Section 3.1 above will be used to map known areas of asbestos hotspots and **the entire site managed as a no dig zone**.

As such, condition monitoring of known ACMs will not be possible however regular site walkovers by the Grounds Maintenance Team and annually by a UKAS accredited company will be undertaken, to ensure no debris has become exposed at the surface, with appropriate remedial work undertaken if any further surface debris is identified.

This AMP is based on the 2022 Management Survey Register and findings, subsequent sampling, site walkovers with the Client and known site history.

The survey reports should be read in full, and it is important to understand the limitations of the survey, in the areas that could not be inspected such as, overgrown vegetated areas and areas that fall outside the scope of survey. If works are to be carried out which involve digging into the ground, the works should be carried out in accordance with CAR 2012. All those carrying out works within the ground must be competent to do so.

### 3.3 ASSETS

There are several buildings at the Aquadrome, with a mix of tenancy agreements and duty holder. Where the duty holder is the tenant asbestos surveys and management plans will be held on a property basis via the respective duty holders.

Where Three Rivers District Council are the duty holder, asbestos survey and management plans will be conducted and managed by the Property Services Department and therefore falls out of the scope of this Asbestos Management Plan. A table outlining the properties, construction years and designated duty holder are provided below:

Building	Construction Year	Duty holder responsible
Café	2009	Café in The Park Ltd
WC Block	2016	TRDC
Three Rivers Grounds Maintenance Depot Yard and Sheds	Approx pre-1970	TRDC
X3 Buildings – Nomad Kayak Club and Bury Lake Young Mariners?	2017/18	BLYM
Old Club House (due to be demolished)	Approx pre-1970	BLYM
Water Ski Club Buildings	Approx pre-1970	Rickmansworth Water Ski Club
Public Toilets	Approx pre-1970	TRDC
URACS (Uxbridge Rovers Angling and Conservation Society) Compound	Modern container	URACS

### 3.4 STAFF TRAINING

All Three Rivers District Council employees and those involved in the supervision / management of asbestos at the Aquadrome will be provided with a copy of the asbestos management plan and relevant asbestos data, instruction that the site is presumed to have ACMs within the ground and the site is a no dig zone.

Regulation 10 of the Control of Asbestos Regulations 2012 states that employers must provide employees with adequate information, instruction and training where they are liable to be exposed to asbestos or supervise such employees. Different levels of training apply depending on the tasks / duties of the employee.

### Toolbox

Each project would include an induction and brief toolbox talk. Operatives working in areas where ACMs are present and where it is considered likely activities could impact ACMs the Project Manager will provide awareness toolbox talks. To ensure they are aware of the risks and ACMs in their work area.

### Asbestos awareness training

UKATA Asbestos Awareness for Groundworkers training will be provided to all Three Rivers District Council employees whose work could foreseeably disturb the ground, such as the Ground Maintenance Team, Trees and Landscaping Team and Animal Welfare Officers, along with those who supervise or manage such work.

The training will include details on asbestos and the uses of asbestos materials in buildings, with an awareness of the types, condition and visual images of what can be found below ground level; the health effects associated with exposure to asbestos; how to avoid the risks associated with asbestos; and general procedures to follow in the case of an incident or emergency.

### Asbestos Management

Employees who have responsibilities for managing asbestos will have additional training to manage the asbestos under the Control of Asbestos Regulations Regulation 4 'duty to manage asbestos in non-domestic premises'. Including understanding asbestos surveys; the asbestos survey report and register; risk assessments; management options; condition monitoring; managing maintenance and construction works; incidents and emergencies; and asbestos removal and remedial works.

### Contractors

Any contractors or sub-contractors who work on site must comply with Regulation 10 of CAR 2012.

### Records

Attendance at training sessions must be documented. Records of asbestos training should be retained for a period of 30 years beyond the last date of employment of each employee.

Records of asbestos awareness will be saved by HR on the training database and copies retained on site in employee files.

### 3.4 ACM CONDITION MONITORING AND RE-INSPECTION

Monitoring the condition of ACMs at the site is Three Rivers District Council responsibility, to ensure that they remain in a satisfactory condition (with a consequent low risk of asbestos fibre release). The asbestos information for the site is based on knowledge and previous surveys, however once all surface remedials have been undertaken, **the site will be managed on a presumptive basis that there are ACMs buried beneath the site and will be managed on a reactive basis.**

Therefore, an asbestos register in the traditional sense, will not be practical, however the Asbestos Management Site Map detailed in Section 3.1, will be used to map known areas of asbestos hotspots and **the entire site is managed as a no dig zone.**

As such, condition monitoring of known ACMs will not be possible however regular site walkovers by the Grounds Maintenance Team and annually by a UKAS accredited company will be undertaken, to ensure no debris has become exposed at the surface, with appropriate remedial work undertaken if any further surface debris is identified.

The Grounds maintenance Team will record any findings from the site walkovers via the Zurich Inspection App, and all copies of reports by a UKAS accredited third party asbestos company, should be promptly updated electronically in the HBI management system.

Three Rivers District Council will be responsible for updating the Asbestos Management Site Map and to action any remedial works identified from the conditioning monitoring at the site.

Where the review concludes that ACMs have been exposed or the remediated area deteriorated, specialist advice should be sought to decide whether action is necessary to manage the risk from the ACM. For example, action may include air monitoring, protection of the ACM, encapsulation, repair or removal. If the damage is sufficiently severe to result in the immediate release or potential release of airborne asbestos fibres, then a licensed asbestos removal contractor should be commissioned in accordance with the emergency procedures.

### 3.5 EXTERNAL CONTRACTORS

External contractors working at the premises will be required to follow the contractor sign in procedure and permit to work with the Grounds Maintenance Manager, which includes provision of a copy of the Asbestos Management Site Map, advice that the entire site is presumed to contain asbestos below the ground, the site is managed as a no dig zone, and advisory note regarding any suspect surface lying ACM debris to be reported, with the provisions of this asbestos management plan that they must follow.

All external contractors must be sufficiently trained, qualified and competent to carry out the works they are intending to do. Appropriate Asbestos Awareness (for Groundworkers) training will be included as part of the contractor pre-qualification approval process and

tender documentation that Three Rivers District Council follow and included in all tender programmes.

Asbestos awareness training must be provided by contractors to all of their employees due to the requirements under Regulation 10, CAR 2012, that; *Information, instruction and training for asbestos awareness is intended to give workers and supervisors the information they need to avoid work that may disturb asbestos during any normal work which could disturb the fabric of a building, or other item which might contain asbestos.*

Contractor induction and a Permit to Work should be completed with the Grounds Maintenance Manager prior to commencing work, in accordance with Three Rivers District Council Procedures, as outlined in Section 6 of this AMP.

For those carrying out intentional work with asbestos containing materials, Section 7 & 8 provides information on requirements for contractor competency, training and experience.

### **3.6 ASBESTOS MANAGEMENT PLAN (AMP) REVIEW**

The AMP should be reviewed annually, or more frequently where there has been a change in legislation, site situation or if arrangements within the plan are no longer considered to be adequate, in order to assess:

- effectiveness of the management plan.
- overall progress made against any agreed action plans.
- suitability and maintenance of communication, instruction, training of personnel, employees and contractors.
- suitability and success of monitoring mechanisms; and
- any updates as a result of legislation changes or incidents.

The annual review of the AMP will be conducted by the Associate Director - Customer and Community and Head of Property as the designated site asbestos duty holders (Three Rivers District Council), with records of the review and agreed actions kept within the AMP within Appendix D, and with electronic copies saved into the Three Rivers District Council electronic shared folder (X:\10\_Major\_Projects\_&\_Property\05\_Estate\_Information\Facilities Management\Asbestos) and HBI management system. Any new revisions of the AMP should be printed and made available in the Grounds Maintenance Office.

### **3.7 DOCUMENTATION AND RECORDS**

Three Rivers District Council will keep all asbestos information as paper copies on site and uploaded electronic copies to the H&S management system HBI Systems, including:

- The asbestos management plans.
- All surveys, sampling and analysis relating to asbestos.
- Result of the regular monitoring of asbestos containing materials.
- Record of Works completed; Method statements, risk assessments, air monitoring results etc. for all works involving asbestos carried out at the site; and
- Details of any accidents, incidents or emergencies and results of investigation.

### **3.8 EMERGENCY SERVICES**

There is a specific requirement within The Approved Code of Practice (L143) Regulation 4 to ensure that information regarding ACM's is made available to the emergency services. Emergency services include Police, Fire, Rescue, Ambulance Services, and Her Majesty's Coastguard.

As such this asbestos management plan and asbestos management site map should be made readily available in cases where such emergency services are required to attend site.

Hard copy asbestos information, including documents and information on the location of ACMs at the site, is kept with the Grounds Maintenance Team and is available to the Emergency Services if required.

In the event of emergency such as fire at the Site, Three Rivers District Council have advised all emergency services of the asbestos information. In addition, the Warden who lives on site will have a copy of the asbestos AMP and data.

## **4 AQUADROME ASBESTOS SURVEY AND REGISTER**

This AMP is based on the management survey and air monitoring detailed in the asbestos data archive, Section 3.2.

### **4.1 ACCESS RESTRICTIONS**

No specific areas of No Access are detailed within the report, however there are limitations such as below ground level, on islands, within the lakes (below water level) and within vegetated areas. The surveyor noted 'Cement debris is visible in the majority of areas accessible by foot excluding the Tarmac paths and is more concentrated to areas with more vegetation or areas that have not had large amounts of resurfacing'.

### **4.2 SCOPE**

The scope of the survey was to the perimeter of the lakes and the car park. During a subsequent site walkover and meeting with the Ground Maintenance Manager, further areas of asbestos cement debris have been highlighted close to the surface in other areas of the site.

**The site will be presumed to contain asbestos material below ground level and the entire site managed as a no dig zone.**

### **4.3 ASBESTOS REGISTER**

An asbestos register in the traditional sense, will not be practical, and therefore the Asbestos Management Site Map detailed in Section 3.1, will be used to map known areas of asbestos hotspots and the entire site managed as a no dig zone. The Asbestos Management Site Plan is held and managed by the Three Rivers District Council Associate Director - Customer and Community and Project Managers should procure updates to the Asbestos Management Site Plan via the GIS officer.

Three Rivers District Council will be responsible for updating the Asbestos Management Site Map and to action any remedial works identified from the conditioning monitoring at the site.

Copies of all paperwork documenting inspection, including any reports issued by third party asbestos companies, should be promptly saved electronically in the HBI management system. If any additional areas of buried hotspots are identified (and remediated) these should be updated onto the Asbestos Management Site Map.

## 5 MANAGEMENT STRATEGY

### 5.1 ASSESSMENT OF RISK

The Management Survey assesses the risk of each ACM taking into consideration the following factors (**Material Risk Assessment**):

- Material type.
- Asbestos type.
- Presence and extent of any encapsulation.
- Condition.

As the survey was a management survey, the recommendation for each item includes advised management actions.

The duty holder or occupier needs to assess the risk of each ACM taking into consideration the following factors (**Priority Risk Assessment**):

- Use of the area.
- Likelihood of material disturbance.
- Likelihood of persons being exposed to asbestos fibres; and
- Frequency and type of maintenance activities that would affect the item.

These items have been assessed by Three Rivers District Council, utilising knowledge of the site occupancy and use by members of the public, occupiers and tenants, along with any planned or likely maintenance / construction works that could affect the potential asbestos below ground level. The risk assessment based on the above criteria is documented in Section 5.2 Site Usage and 5.3 Planned works, with the concluded remedial actions provided in 5.4 below.

The management strategy for the ACMs known at this site, is to ensure as reasonably practicable that no surface debris is accessible by members of the public. To remove all visible debris and ensure it is encapsulated by the lakes or buried in the soil.

**The site will be presumed to contain asbestos material below ground level and the entire site managed as a no dig zone.**

A list of potential reactive management tasks is listed below:

- Reported surface debris by grounds maintenance.
- Planting trees and tree falls; and
- Minor installations.

## 5.2 SITE USAGE (USE OF AREA)

Normal use of the site will comprise public recreational access and leisure activities. Bury Lake is used by Bury Lake Young Mariners, Nomad Kayak Club and Three Rivers Radio Yachting Club. Batchworth Lake is used by Rickmansworth Water Ski Club and Uxbridge Rovers Angling and Conservation Society.

In order to assess the background levels of fibres in air and the risk to the general public using the site for general recreational purposes such as dog walking. RSK Asbestos undertook background air monitoring and activity based personal air monitoring (walking around the site) to provide a datum level to assess the risk of asbestos fibres in air. The results of this air monitoring showed no detectable levels of fibres in air and the certificates held on HBI management system.

The lakes are used for recreational water sports, and it is known ACMs are exposed below the water line from visual confirmation from the shoreline and also suspected present in the lakebed. The presence of the water will act as an encapsulant and fibre suppressant regarding the risk of fibres in air. In May 2022 Faber Maunsell conducted and published a review for the Drinking Water Inspectorate (DWI) on Asbestos Cement drinking water pipes and possible health risks. This study concluded:

*'The World Health Organisation considered asbestos in drinking water arising from asbestos cement pipe in their 1993 edition of the Guidelines for Drinking Water Quality. The guidelines state "Although well studied, there has been little convincing evidence of the carcinogenicity of ingested asbestos in epidemiological studies of populations with drinking water supplies containing high concentrations of asbestos...There is therefore no consistent evidence that ingested asbestos is hazardous to health and thus it was concluded that there was no need to establish a health-based guideline value for asbestos in drinking water".'*

*Although measurement of asbestos fibres in drinking water is technically difficult, research has indicated that most waters, whether or not distributed through asbestos cement pipes, contain asbestos fibres. This is because asbestos is widely found in the environment as a consequence of natural dissolution of asbestos-containing minerals.'*

As potable water is a much more sensitive water use the results of the numerous studies in this area, confirm the risk of fibres in the lakes is considered negligible for recreational users.

Based on the activities carried out by Three Rivers District Council and its tenants there is generally a low risk of disturbance to ACMs.

## 5.2 PLANNED WORKS (LIKELIHOOD OF MATERIAL DISTURBANCE)

Maintenance activities at the site is controlled by Three Rivers District Council (Grounds Maintenance Manager) and are undertaken by the internal ground's maintenance team, leisure and landscaping, trees department, property teams and external contractors. There is an increased risk of disturbance to ACMs during maintenance activities; therefore, a Contractor Induction and Asbestos Permit to Work should be completed by the relevant Three Rivers District Council Project Manager, in accordance with Three Rivers District Council Procedures, as outlined in Section 6 of this AMP.

A number of controls and procedures have been adopted to minimise risk for regular site tasks. General site maintenance activities and controls are listed below:

- Activities on the islands are now prohibited, i.e.: painting of geese eggs and tree thinning.
- Mowing of grass areas has set limits for ecological and asbestos risk purposes. The minimum mowing lengths are:
  - Standard grass cutting between 50mm – 75mm; and
  - Re-wilding areas 75mm – 100mm (cut once or twice a year)
- Lake water levels are maintained at 3.2m to ensure all ACMs in the lakebed remain below water level.
- Fallen trees/ exposed root balls: Grounds Maintenance can make safe and restrict access to public. The works will need to be completed by a competent contractor who can support trees and landscaping department to unload the root ball and ensure a surface pick of the area as non-licensed works.
- Resurfacing paths, pothole filling and any works which involve new trenches for reasons such as utility providers (property) will need to be completed by a competent contractor who can support these activities as non-licensed works.
- Grounds maintenance tasks, such as installing benches, bins etc, will be installed using ground anchors add ground.
- Event hires will be informed not to penetrate ground, including digging, raking, staking or any activity which could erode or expose anything below the ground surface.
- Following heavy rain fall and flooding, Grounds maintenance will inspect areas for any exposed surface lying debris.
- All lake users will be advised not to put anything in the lakes or take anything out – i.e.: no dredging, use of bed anchors will require a suitable risk assessment.

### 5.3 REMEDIAL ACTIONS

The identified ACM debris across the site is identified as asbestos cement (AC) a non-licensable, lower risk product. The debris is only located within vegetation areas adjacent to the paved paths and buried 'hotspots' exposed at a few lake bank locations.

Three Rivers District Council have reviewed the findings and recommendations of the management asbestos survey carried out at the site, assessing the risk that each item poses and to compile a management strategy.

A site walkover was undertaken to review the findings of the management survey and prioritise remedial works to safeguard the public. A two phased approach was designed, Phase 1 was an urgent reactive remedial project to target areas which were deemed higher risk where ACMs could be accessible by members of the public. Phase 2 will be a general hand pick of surface debris to the site but will be conducted in the winter months to provide better access within areas of vegetation.

#### **Phase 1 Remedial Works – RSK Reference: 1473640, July 2022**

These works were undertaken in June 2022 and comprised seven locations with varying remedial work required.

- Areas 1 was to handpick woven asbestos textile debris located close to a path on the south bank of Batchworth Lake.
- Area 2 was to remove a shopping trolley from the URACS enclosure, which is believed to contain dredged material, including pieces of asbestos cement board.
- Area's 3, 4, 5 & 6 were locations around Batchworth Lake where buried asbestos cement (hotspots) were exposed at the surface. The areas were handpicked for surface debris and covered with orange geotextile membrane, delta pegs used to peg in position, then covered with Type 1 (engineer fill), approximately 6 – 12 inches depth; and
- Area 7 is located adjacent to the picnic area providing access to the canal. This area had extensive AC debris at the surface and no paving or surfacing to protect users of the path. An extensive surface handpick was undertaken to clear the area, to make safe for public access. In Phase 2 of the remedial works, a more extensive hand pick of the currently vegetated area will be undertaken, and geomembrane and engineered fil protection will be undertaken.

RSK analyst provided a watching brief of the removal programme and conducted air monitoring to include static air monitoring adjacent to works and personal monitoring on removal operatives.

**Phase 2 Remedial Works – RSK Reference: 1475228, March 2023**

A licensed asbestos removal contractor (LARC) provided an asbestos trained supervisor and operative to carry out a surface pick of visible asbestos cement debris/fragments to areas/footpaths around Batchworth Lake, including any open grass areas and paths leading to swims, and both sides of footpath as defined during the site walkover on Thursday 16th February 2023. The works were divided in to 3 areas, as specified by the Client for segregation from public access: Area 1, Area 2 & Area 3.

Additionally, a surface pick of fenced off cement debris/fragments to picnic area and adjacent barriered off area in trees/shrubbery, as well as a surface pick of the canal towpath whilst on site.

RSK analyst provided a watching brief of the removal programme and conducted air monitoring to include static air monitoring adjacent to works and personal monitoring on removal operatives. In addition, Area 7 as above, extensive hand pick of the currently vegetated area will be undertaken.

**Picnic Area Hand Picking – RSK reference: 1474082, September 2022**

A subsequent area of surface debris was identified in the picnic area, these works were undertaken in September 2022 and comprised hand pick of surface AC and AIB debris.

**Water Ski Club – RSK reference: 1475506, April 2023**

A hand pick of surface debris west of the Water Ski club was undertaken with RSK analyst provided a watching brief of the removal programme and conducted air monitoring to include static air monitoring adjacent to works and personal monitoring on removal operatives. Also highlighted at the time of the works, was an exposed root ball including ACMs, adjacent to the work area.

**Root ball**

Fallen tree/ Root ball exposed with ACMs in root ball – identified near the Water Ski Club, which was cut back, to reinstate the root ball, works were undertaken as non-licensed with clean and hand pick of any surface debris remaining. Documents awaited from Grounds Maintenance team.

#### **5.4 REACTIVE REMEDIALS**

As part of the on-going management strategy once all accessible ACM debris has been removed, as far as reasonably practicable the site will be managed as a no dig zone and a presumption of asbestos below ground level.

Grounds Maintenance will undertake regular site walkovers and following any adverse weather conditions such as heavy rainfall and flooding for any surface lying debris.

The Grounds Maintenance Manager will restrict access and report fallen tree (exposed root balls), erosion, and other incidents that have exposed suspect ACMs at the surface. These will be subsequently investigated and remediated as required.

## **6 PROJECT MANAGEMENT**

### **6.1 WORKING WITH ACMS - GENERAL REQUIREMENTS**

Three Rivers District Council will appoint a Licensed Asbestos Removal Contractor (LARC) for all licensed works with asbestos and where appropriate use competent contractors for non-licensed works.

All work with ACMs shall be undertaken in accordance with the HSE Approved Code of Practice (ACoP) L143 Managing and working with asbestos, (2014). The scope of this ACoP includes any materials of bitumen, plastic, resins or rubber and also minor works of short duration to asbestos insulation, asbestos coating and AIB.

Prior to any work with asbestos insulation, asbestos coating and AIB (other than minor work of short duration) the asbestos removal contractor will formally notify the HSE of the date of commencement giving at least 14 days prior notice to works starting on-site. In addition, the asbestos removal contractor is required to prepare and submit a Plan of Work and Method Statement for approval by the Three Rivers District Council Facilities Manager and/or Planning Supervisor prior to works commencing.

All work with asbestos insulation, asbestos coating and AIB shall be undertaken using fully controlled conditions utilising PPE equipped operatives within a negative pressure enclosure and undertaken by appropriately competent and licensed contractors.

During work with asbestos, it is often necessary to carry out air monitoring to assess the concentration of airborne asbestos fibre levels that have been generated by the removal / remediation process. Air monitoring in many instances is a legal requirement of CAR 2012.

For any notified asbestos removal work carried out under the terms of an HSE Asbestos Removal License (i.e., the standard work carried out by Licensed Asbestos Removal Contractors), the Control of Asbestos Regulations 2012 require that a Certificate of Reoccupation is issued by an independent third-party laboratory, which must be accredited by the United Kingdom Accreditation Service (UKAS) to ISO17025. Only when all of stages of the four-stage clearance have been completed satisfactorily can the Certificate of Reoccupation be issued.

Upon completion of asbestos removal work, information should be collated by the Project Manager with the details logged in Appendix E of this AMP and uploaded and saved onto the HBI Management System and electronic shared server (X:\10\_Major\_Projects\_&\_Property\05\_Estate\_Information\Facilities Management\Asbestos). The information should include:

- the contractor's risk assessment.
- the scope of works/plan of works.
- ASB5 (asbestos works notification form).

- hazardous waste consignment notes; and
- air monitoring certificates.

All work with asbestos-cement, bitumen, plastic and/or resin-based ACMs shall be undertaken in accordance with HSE guidelines, such as, HSG 210: Asbestos essentials task sheets. Upon completion of the work, information that should be provided to Three Rivers District Council includes waste transfer documentation to validate that any asbestos waste has been disposed of in the appropriate manner.

The following documentation shall be maintained for all asbestos abatement projects:

- project scope.
- notifications to regulatory agencies.
- air sampling records.
- inspection records.
- daily logs.
- sign in and sign out logs.
- clearance documentation.
- disposal documentation; and
- contractor employee fitness records, training certificates and licenses.

Records of waste generation, transportation and disposal shall be retained indefinitely by the site.

Guidelines for working with ACMs during maintenance and project work activities are provided in the following sections.

## 6.2 GROUNDS MAINTENANCE

One of the groups at higher risk of exposure to asbestos fibres at the Aquadrome site are those working in maintenance (grounds maintenance, landscaping), construction, and allied trades and professions. These workers could come across asbestos containing materials during their normal work and potentially disturb them if they do not know they contain asbestos. All works therefore, from minor repairs to major projects and whether planned or reactive, must include consideration of:

- The site will be presumed to contain asbestos material below ground level and the entire site managed as a no dig zone.
- Are the works to be carried out liable to disturb the asbestos containing materials or the ground.

All grounds maintenance works in the Three Rivers District Council demise will be sanctioned by the Three Rivers District Council Project Manager.

When the scope of any maintenance work is known, an assessment shall be undertaken by the Project Manager to determine whether the ground or ACMs are likely to be disturbed. If the assessment concludes that no disturbance of the ground and therefore presumed ACMs below ground will not be affected, then the work will be sanctioned and an Asbestos Permit to Work form completed. If ACMs are considered likely to be disturbed, the work must not proceed until appropriate steps are taken to manage the risk.

As a matter of principle, all grounds maintenance activities shall, wherever possible, avoid all contact with, or disturbance of, any ACMs present. Where this is not possible, and where maintenance work may impact any ACMs, an appropriately trained non-licensed sub-contractor will be used, or specialist advice should be sought to establish a safe or alternative method of working before any work commences.

Depending upon the category and scope of works, it may be necessary to employ a licensed asbestos removal contractor (LARC). If ACMs are considered likely to be disturbed as part of the proposed works, then an assessment of the works must be undertaken and either an appropriately trained non-licensed contractor or LARC may remove the ACMs, prior to the proposed maintenance works, see also Sections 7 & 8.

Prior to works starting on site, the Project Manager will issue a letter to the contractor when commissioning the works, providing an asbestos register extract relevant to the contractor's work area, for consideration in the contractor's risk assessments and method statements (RAMS).

All contractors must sign in via the Project or Grounds Maintenance Manager and participate in the site induction procedure and completion of an Asbestos Permit to Work, which includes copies of all relevant information on asbestos management at the premises. The completed Permit to Work form will be saved/ archived to the Three Rivers District Council

electronic shared folder (X:\10\_Major\_Projects\_&\_Property\05\_Estate\_Information\Facilities Management\Asbestos) and HBI management system by the Project or Grounds Maintenance Manager.

### **6.3 PROJECT WORK**

Currently there are several projects planned at the site within the Three Rivers District Council areas of responsibility.

1. Bridge Project – plans to replace and widen the bridge and cycle path. Project planned for 2024/25.
2. Car Park reconfiguration – planned to comprise build up rather than and reduction or excavation work. Project planned for 2025/26
3. Ground Maintenance enclosure reconfiguration – to include replacing the Grounds maintenance office. Project planned for 2024/25.

When the scope of any project work is known, an assessment shall be undertaken by reviewing the current Asbestos information and assumption for ACMs to be present in the ground and the site treated as a no dig zone. whether the project is likely to disturb the ground and potential ACMs. If the assessment concludes that work may impact any ACMs, then specialist advice should be sought.

It is envisaged that all project work will be managed by an internal Project Manager. Any contractors shall be formally made aware of the presumed presence of asbestos by the appointed Project Manager by means of referral to the Asbestos Management Site Plan and this Asbestos Management Plan.

If any works are planned, it is expected that the contractor will review assume the presence of ACMs in the ground and take appropriate steps to safeguard his own and the occupant's safety prior to commencement of any works. All RAMS should be reviewed by the Project Manager for approval and authorisation prior to instruction.

Tradesmen and contractors undertaking project work will have an induction from the Project or Grounds Maintenance Manager which as outlined above in Section 6.2.

Upon completion of any project work that has an impact on the ground and ACMs, it is necessary to update this AMP and the Asbestos Management Site Plan with records of work done. Documentation and a record of works completed should be provided to the Associate Director - Customer and Community and saved on the Three Rivers District Council HBI management system, saved in the electronic shared folder (X:\10\_Major\_Projects\_&\_Property\05\_Estate\_Information\Facilities Management\Asbestos) and recorded in Appendix E of this AMP.

#### **6.4 ASBESTOS RECOGNITION**

The Aquadrome is presumed to contain asbestos materials hidden below the ground surface, therefore the entire site is presumed and designated a no dig zone.

Under no circumstances shall any work which may disturb the ground without prior approval from Three Rivers District Council and undertaken in accordance with CAR 2012.

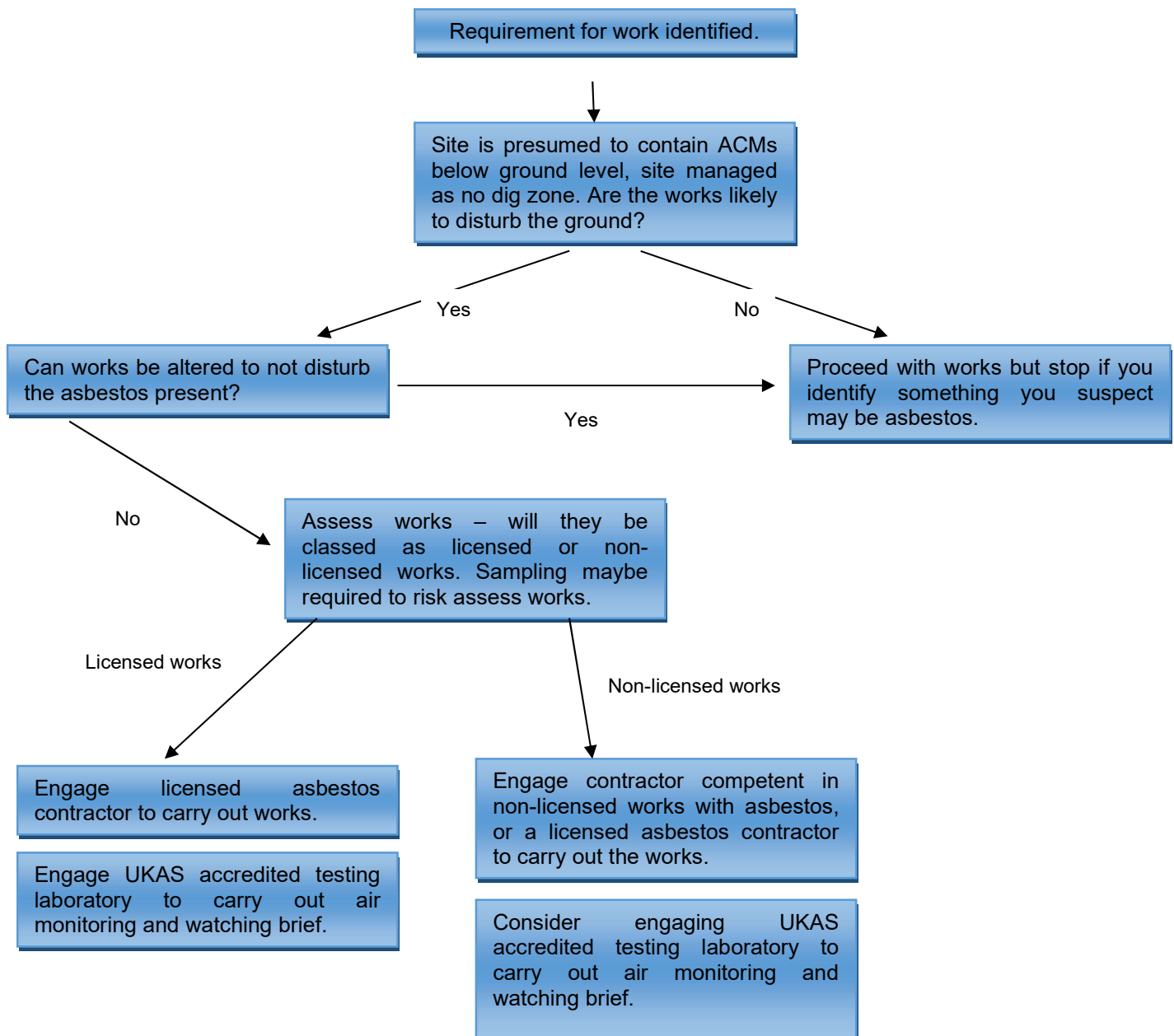
Personnel, contractors, subcontractors, contracted services, vendors and tenants shall be notified of the presumed asbestos containing material below ground and instructions not to disturb the ground.

#### **6.5 RECORD OF WORK COMPLETED**

If any remedial or removal work with ACMs is undertaken, the following information should be obtained, provided to the Project Manager and saved on the Three Rivers District Council HBI management system and recorded in Appendix E of this AMP:

- the scope of works and quotation.
- contractor method statement and risk assessment.
- appropriate air monitoring and clearance certificates; and
- appropriate hazardous waste transfer notification.

It is important to update the Asbestos Management Site Map following any works affecting ACMs at the site, to maintain an accurate and up to date assessment of ACMs.



## **7 INTENTIONAL WORKS WITH ASBESTOS CONTAINING MATERIALS**

### **7.1 ASBESTOS REMOVAL AND REMEDIAL WORKS**

Any remedial work on site (IRI lease and Ground Projects), is the responsibility of the owner of the site. Three Rivers District Council will collate all appropriate documentation upon completion of the works either from a LARC or NLW contractor and saved on the electronic shared folder (X:\10\_Major\_Projects\_&\_Property\05\_Estate\_Information\Facilities Management\Asbestos) and HBI management system.

Work with asbestos materials, i.e., removal and remedial works, is divided into two main categories: licensed and non-licensed. Licensed work can only be carried out by a contractor who holds a licence to work with asbestos materials from the Health & Safety Executive.

Work is classified as licensed (and thus can only be carried out by an asbestos contractor holding a licence from the HSE):

- Where worker exposure to asbestos is not sporadic and of low intensity, **OR**
- Where the risk assessment cannot clearly demonstrate that the control limit will not be exceeded, **OR**
- Where on asbestos coating (surface coatings which contain asbestos for fire protection, heat insulation or sound insulation but not including textured decorative coatings), **OR**
- Where on asbestos insulation or asbestos insulating board (AIB) where the risk assessment demonstrates that the work is not sporadic and of low intensity, the control limit will be exceeded, and it is not short duration work.

All licensed works will require a 14-day notification made by the licensed asbestos contractor to the enforcing authority prior to works commencing.

Some non-licensable works are notifiable to the enforcing authority, therefore if the works are deemed non-licensable, then an assessment must further be made as to whether they would be notifiable or non-notifiable. If they are deemed notifiable then the contractor will complete the notification form online and send to the enforcing authority. There is no requirement in this instance to wait 14 days; works can begin following notification.

The Approved Code of Practice L143 'Managing and working with asbestos' states the following criteria for work with asbestos to be considered non-licensable and non-notifiable, which the internal Maintenance NLW Team are trained and competent to do:

- Exposure to asbestos is sporadic and of low intensity.

- It is clear from the risk assessment that the exposure to asbestos of any employee will not exceed the control limit; and
- The work falls into one of the following categories:
  - Short, non-continuous maintenance activities in which only non-friable materials are handled.
  - Removal without deterioration of non-degraded materials in which the asbestos fibres are firmly linked in a matrix.
  - Encapsulation or sealing of ACMs in good condition.
  - Air monitoring and control and collecting and analysing samples to establish whether a specific material contains asbestos.

If works are classed as licensable then they will require 4-stage clearance testing (comprising a combination of inspection and air monitoring) to be carried out following completion, prior to the area being deemed suitable for re-occupation.

Non-licensable works will not require such clearance testing but inspection and / or air monitoring may be appropriate.

## **7.2 ASBESTOS SURVEYING, SAMPLING AND AIR MONITORING**

Asbestos surveying; sampling and analysis to test for the presence of asbestos; airborne fibre monitoring; and 4-stage clearance testing following completion of licensed asbestos works do not require a licence from the HSE but are subject to specific quality requirements. In commissioning these activities, Three Rivers District Council will ensure that UKAS (United Kingdom Accreditation Service) accreditation is held by the organisation for the specific activity they are to carry out.

It is intended RSK Asbestos will provide these services if required.

## **7.3 METHOD STATEMENT AND RISK ASSESSMENT**

All works must be subject to suitable risk assessment and method statement as part of the works planning phase. These documents should include details of:

- Type of asbestos fibre and asbestos material present, along with the volume and condition.
- Description of the proposed work including scale and duration.
- An assessment as to whether the works would be classified as licensable or non-licensable.

- Expected exposure.
- Control measures to prevent / reduce exposure to the lowest level reasonably practicable.
- Control measures to prevent spread of asbestos from the work area to other areas.
- Methods of decontamination (of personnel and plant / equipment).
- Personal protective equipment required, including respiratory protective equipment.
- Waste management.
- Procedures for incidents and emergencies; and
- Non-asbestos hazards (use of plant, buried services, chemicals, manual handling etc.).

All risk assessments and method statements must be produced by a competent person and be provided to Three Rivers District Council Project Manager for approval prior to starting works, as well as to those carrying out the work at the site. If the scope of work or environment changes during the project, then work must stop, and the documents be reviewed and altered as necessary prior to recommencement.

## **8 CONTRACTOR COMPETENCIES**

### **8.1 LICENSED ASBESTOS CONTRACTORS**

If the works are deemed licensed, then they must be carried out by a contractor licensed by the HSE to work with asbestos. A list of licensed contractors is available on the HSE website. The licensed contractor must keep copies of the following documentation on site during the works, provided to the duty holder, Three Rivers District Council:

- 14-day notification to the enforcing authority (ASB5).
- Method statement and risk assessment for the works.
- Training certificates for personnel.
- Medical certificates for personnel.
- Face-fit tests and RPE examination records.
- Test certificates for plant and equipment.
- Site log.
- Results of air monitoring; and
- Any other documentation as required by legislation.

Companies carrying out licensed works must be able to:

- Demonstrate suitable experience of previous similar work carried out.
- Demonstrate high standards of health, safety and environmental management, for example through registration to relevant ISO and OHSAS standards.
- Produce training certificates, medical certificates and face-fit certificates for operatives.
- Produce records of calibrations, servicing and inspection of equipment, including personal protective equipment.
- Produce risk assessments and method statements; and
- Demonstrate membership of a recognised trade organisation.

## 8.2 NON-LICENSED CONTRACTORS

If the works are deemed non-licensed, then contractors do not require a licence. However, all personnel carrying out these works must have undertaken appropriate training (such as UKATA non-licensable work with asbestos); they must all have an appropriate face-fit test for the respiratory protection they are intending to wear and, if works are notifiable, be under medical surveillance and have a health record kept by their employer.

The contractor must keep copies of the following documentation on site during the works, provided to the duty holder, Three Rivers District Council:

- Copy of notification to enforcing authority (if appropriate).
- Method statement and risk assessment for the works.
- Training certificates for personnel.
- Medical certificates for personnel.
- Face-fit tests and RPE examination records.
- Test certificates for plant and equipment.
- Site log.
- Results of air monitoring; and
- Any other documentation as required by legislation.

Companies carrying out non-licensed works must be able to:

- Demonstrate suitable experience of previous similar work carried out.
- Demonstrate high standards of health, safety and environmental management, for example through registration to relevant ISO and OHSAS standards.
- Produce training certificates, medical certificates and face-fit certificates for operatives.
- Produce records of calibrations, servicing and inspection of equipment, including personal protective equipment; and
- Produce risk assessments and method statements.

### **8.3 ASBESTOS CONSULTANCY COMPANIES**

It is intended that RSK Asbestos will provide asbestos consultancy services where required for Three Rivers District Council.

Asbestos consultancy companies providing air monitoring and / or analysis of samples for the presence of asbestos must:

- Possess appropriate UKAS accreditation for the activity they are to carry out. A list of accredited organisations can be found at [www.ukas.org](http://www.ukas.org);
- Demonstrate high standards of health, safety and environmental management, for example through registration to relevant ISO and OHSAS standards; and
- Demonstrate independence, impartiality and integrity. For example, be separate to those involved in asbestos removal or remediation.

### **8.4 NON-ASBESTOS CONTRACTORS AND IN-HOUSE PERSONNEL CONDUCTING MAINTENANCE / CONSTRUCTION WORKS**

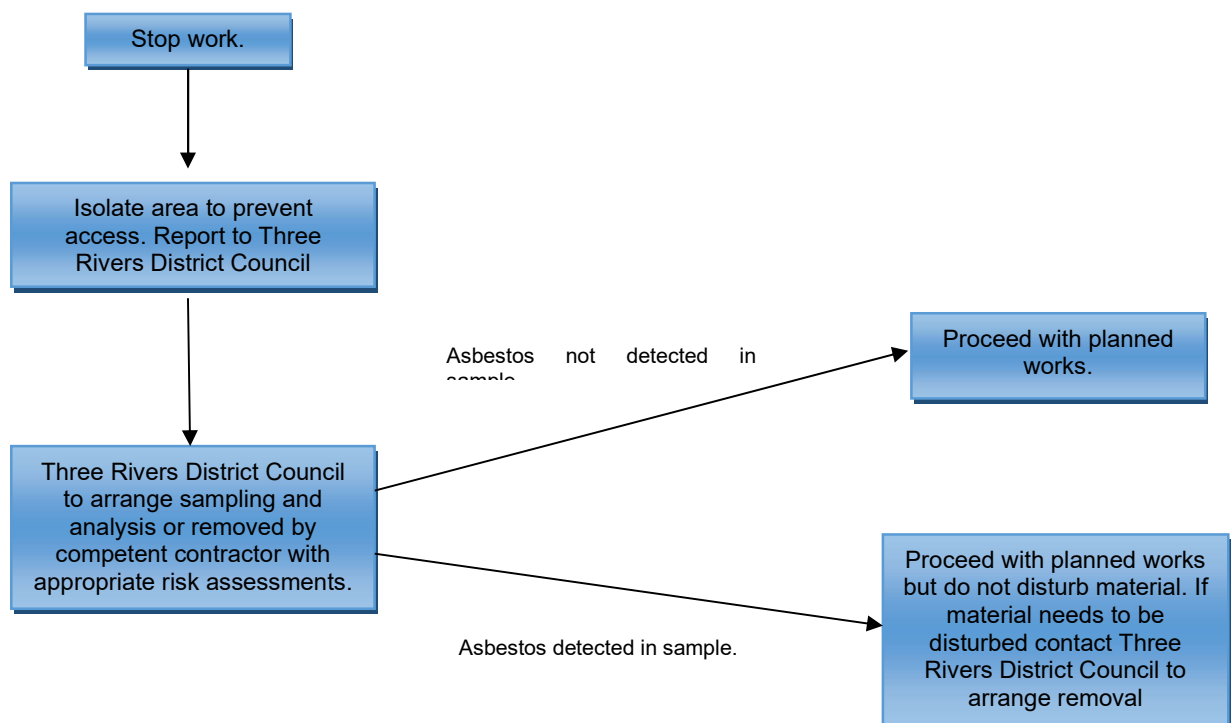
All contractors / in-house personnel conducting maintenance / animal welfare / landscaping / construction works on the premises must be able to demonstrate competence regarding asbestos management. Specifically:

- All those working on the premises or supervising / managing such work must have undertaken asbestos awareness training.
- Method statements and risk assessments must demonstrate that they have considered the asbestos information in their planning and that no work will be carried out that would result in disturbance of any asbestos containing materials.

## 9 INCIDENTS AND EMERGENCIES

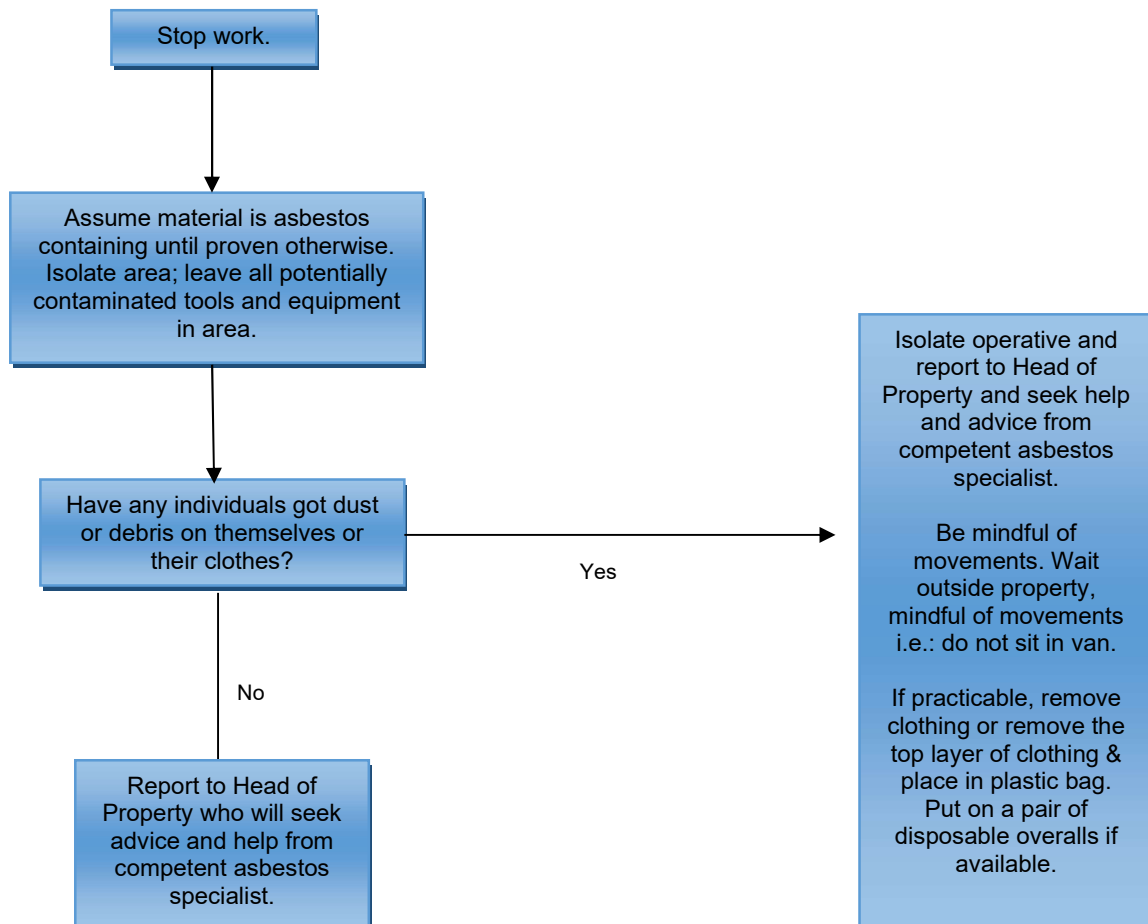
### 9.1 ADDITIONAL MATERIALS SUSPECTED OF CONTAINING ASBESTOS

As per this asbestos management plan, the Aquadrome is managed by a presumption of asbestos materials below ground and the site a no dig zone, this must be assumed for all maintenance, refurbishment, construction or demolition works. However, personnel carrying out the works must be reminded of the potential for further materials suspected of containing asbestos to be uncovered. If any individual comes across a material, they suspect may contain asbestos the following procedure should be followed:



## 9.2 UNPLANNED DISTURBANCE OF ASBESTOS CONTAINING MATERIAL

If materials known or suspected to contain asbestos are disturbed, for example through accidental damage whilst carrying out work on other materials in the vicinity, the following procedure should be followed.



## 9.3 INCIDENTS AND EMERGENCIES ARISING WHILST INTENTIONAL WORK WITH ASBESTOS IS BEING CARRIED OUT

All those carrying out work with asbestos containing materials must include provision in their risk assessment / method statement to manage any incidents and emergencies that occur during the works, including coordination with the emergency services as required. This includes:

- Observing and / or disturbing additional material that may contain asbestos that is not within the scope of the works.
- Accident, injury or illness to an operative who is carrying out the works.

- Fire / explosion or another incident on site.
- Non-compliant management of asbestos waste; and
- Uncontrolled release of asbestos fibres.

All incidents and emergencies involving asbestos must be reported to the Head of Property and will be subject to subsequent investigation, root cause analysis and remedial actions.

## **APPENDIX A**

### **Service Constraints**

## **RSK ENVIRONMENT LIMITED SERVICE CONSTRAINTS**

1 This report and the asbestos survey carried out in connection with the report (together the "Services") were compiled and carried out by RSK Environment Limited (RSK) for Three Rivers District Council (the "client") in accordance with the terms of a contract between RSK and the "client". The Services were performed by RSK with the skill and care ordinarily exercised by a reasonable environmental consultant at the time the Services were performed. Further, and in particular, the Services were performed by RSK taking into account the limits of the scope of works required by the client, the time scale involved and the resources, including financial and manpower resources, agreed between RSK and the client.

2 Other than that expressly contained in paragraph 1 above, RSK provides no other representation or warranty whether express or implied, in relation to the Services.

3 Unless otherwise agreed the Services were performed by RSK exclusively for the purposes of the client. Unless expressly provided in writing, RSK does not authorise, consent or condone any party other than the client relying upon the Services. Should this report or any part of this report or otherwise details of the Services or any part of the Services be made known to any such party, and such party relies thereon that party does so wholly at its own and sole risk and RSK disclaims any liability to such parties.

4 It is RSK's understanding that this report is to be used for the purpose described in the introduction to the report. That purpose was a significant factor in determining the scope and level of the Services. Should the purpose for which the report is used, or the proposed use of the site change, this report may no longer be valid and any further use of or reliance upon the report in those circumstances by the client without RSK's review and advice shall be at the client's sole and own risk. Should RSK be requested to review the report after the date hereof, RSK shall be entitled to additional payment at the then existing rates, or such other terms as agreed between RSK and the client.

5 The passage of time may result in changes in site conditions, regulatory or other legal provisions, technology or economic conditions which could render the report inaccurate or unreliable. The information and conclusions contained in this report should not be relied upon in the future without the written advice of RSK. In the absence of such written advice of RSK, reliance on the report in the future shall be at the client's own and sole risk. Should RSK be requested to review the report in the future, RSK shall be entitled to additional payment at the then existing rate, or such other terms as may be agreed between RSK and the client.

6 The observations and conclusions described in this report are based solely upon the Services which were provided pursuant to the agreement between the client and RSK. RSK has not performed any observations, investigations, studies or testing not specifically set out or required by the contract between the client and RSK. RSK is not liable for the existence of any condition, the discovery of which would require performance of services not otherwise contained in the Services. For the avoidance of doubt, unless otherwise expressly referred to in the introduction to this report, RSK did not seek to evaluate the presence on or off the site of asbestos, electromagnetic fields, lead paint, heavy metals, radon gas or other radioactive or hazardous materials.

7 The Services are based upon RSK's observations of existing physical conditions at the Site gained from a walk-over survey of the site together with RSK's interpretation of information including documentation, obtained from third parties and from the client on the history and usage of the site. The Services are also based on information and/or analysis provided by independent testing and information services or laboratories upon which RSK was reasonably entitled to rely. The Services clearly are limited by the accuracy of the information, including documentation, reviewed by RSK and the observations possible at the time of the walk-over survey. Further RSK was not authorised and did not attempt to independently verify the accuracy or completeness of information, documentation or materials received from the client or third parties, including laboratories and information services, during the performance of the Services. RSK is not liable for any inaccurate information or conclusions, the discovery of which inaccuracies required the doing of any act including the gathering of any information which was not reasonably available to RSK and including the doing of any independent investigation of the information provided to RSK save as otherwise provided in the terms of the contract between the client and RSK.

8 Any site drawing(s) provided in this report is (are) not meant to be an accurate base plan but is (are) used to present the general relative locations of features on, and surrounding, the site.

## **APPENDIX B**

### **Three Rivers District Council Asbestos Policy**

**APPENDIX C**  
**Permit to Work**

**APPENDIX D**  
**Record of AMP Reviews Completed**

[illegible]

**APPENDIX E**  
**Record of ACM Works Completed**

Record of Works Completed (and documents saved on HBI Management System)

	Location	Description of Works	Contractor	Documents and their location	Date Complete
1	Phase 1 Remedials	<p>Areas 1 - handpick woven asbestos textile debris located adjacent to path on the south bank of Batchworth Lake.</p> <p>Area 2 - remove a shopping trolley from the URACS enclosure, which is believed to contain dredged material, including pieces of asbestos cement board.</p> <p>Area's 3, 4, 5 &amp; 6 were locations around Batchworth Lake where buried asbestos cement hotpots was exposed at the surface. Areas were handpicked for surface debris and covered with orange geotextile membrane, delta pegs used to peg in position, then covered with Type 1 (engineer fill), approximately 6 – 12 inches depth.</p> <p>Area 7 - located adjacent to the picnic area providing access to the canal. An extensive surface handpick was undertaken to clear the area, to make safe for public access.</p>	KPL Environmental Ltd	<p>KPL Risk Assessment and Plan of Work</p> <p>RSK Air Monitoring Certificates</p> <p>Waste Note</p>	June 2022
2	Phase 2 Remedial Works	<p>Surface pick of visible asbestos cement debris/fragments to areas/footpaths around Batchworth Lake, including open grass areas and paths leading to swims, and both sides of footpath.</p> <p>The works were divided in to 3 areas, as specified by the Client for segregation from public access. A surface pick of fenced off cement debris/fragments to picnic area and adjacent barriered off area in trees/shrubbery, as well as a surface pick of the canal towpath whilst on site.</p>	KPL Environmental Ltd	<p>KPL Risk Assessment and Plan of Work</p> <p>RSK Air Monitoring Certificates</p> <p>Waste Note</p>	March 2023

	Location	Description of Works	Contractor	Documents and their location	Date Complete
3	Picnic Area	Hand pick of surface AC and AIB debris.	KPL Environmental Ltd	RSK Asbestos Bulk Certificate  KPL Risk Assessment and Plan of Work  RSK Air Monitoring Certificates	Sept 2022
4	Water Ski Club	A hand pick of surface debris west of the Water Ski club was undertaken with RSK analyst provided a watching brief of the removal programme and conducted air monitoring to include static air monitoring adjacent to works and personal monitoring on removal operatives. Also highlighted at the time of the works, was an exposed root ball including ACMs, adjacent to the work area.	KPL Environmental Ltd	RSK Asbestos Bulk Certificate  KPL Risk Assessment and Plan of Work  RSK Air Monitoring Certificates  Waste Note	April 2023
5	Root ball near Water Ski Club	Fallen tree/ Root ball exposed with ACMs in root ball – identified near the Water Ski Club, which was cut back, to reinstate the root ball, works were undertaken as non-licensed with clean and hand pick of any surface debris remaining. Documents awaited from Grounds Maintenance team.			