**RE Cavity Contamination Risks:**

There is a legal requirement to remove the asbestos containing materials (ACMs) from buildings before demolition and you should ensure that this is done, where reasonably practicable. There may be some circumstances where the risks involved in the removal of ACMs out-weigh the residual risks of leaving them in situ. For example this could apply to textured coating to concrete or bitumen adhesive which are generally low risk items.

The former British Home Store site in Hull however contains a higher risk product known as sprayed coating. The building is heavily contaminated with this asbestos spray coating to an extent that it appears structurally impossible to remove under normal controlled measures. Sprayed coating residues have been identified within the hollow cavities of the block and beam floor structure. At present it is not possible to remove or access these blocks to remediate the asbestos material without disturbing the structural integrity of the building.

Aside from the known residual material in the block and beam cavities, residues have also been located to other cavities and crevices which, due to the nature of the material and the existing locations where it have been found it is extremely likely that this contamination in residual form/small amounts could be present throughout the building. The analyst issuing the 4SC certification will identify these potential areas as required by HSG248 para(s) 6.28-6.29, which shall in turn be addressed prior to or during the demolition.

The City of Hull has planned to remove and preserve the Murals from the BHS building however at present we cannot confirm that cavities around these structures are or will be asbestos free to the extent that the murals can be removed without risk of asbestos fibre release.

The material is being removed as far as possible at this stage of the programme however small amounts of residues will remain in the building. While enclosed or encased, they are not an immediate risk to the general workforce or public unless disturbed in an uncontrolled environment. The demolition of the building will be completed against a methodology which will address the residual materials and ensure that the correct control measure and monitoring are in place. With regard to the preservation of the mural it is becoming apparent that some of the asbestos may not be accessible enough to be removed or mitigated enough to allow the extraction of the murals until the point of demolition. If the extraction is completed at this point further tests and inspection may be necessary to confirm that it can be dismantled and cleaned in order for it to be re-established elsewhere. This task, practically, may not be achievable.

Below are some extracts from the CAR regs, supporting ACoP guidance and HSG Docs.

While every effort will be made to satisfy the analyst that an area is asbestos free as far as reasonably practical there will be areas which cannot be made accessible, as such these will be identified and may be removed at a later date either prior to or during the demolition, either way a suitable method will be established to see that asbestos fibre release is prevented or reduced so as not to exceed the control limit.

**CAR Regs 2012:**

Reg 7

*(1) An employer must not undertake any work with asbestos without having prepared a suitable written plan of work detailing how that work is to be carried out.*

*(2) The employer shall keep a copy of the plan of work at those premises at which the work to which the plan relates is being carried out for such time as that work continues.*

*(3) In cases of final demolition or major refurbishment of premises, the plan of work must, so far as is reasonably practicable, specify that asbestos must be removed before any other major works begin, unless removal would cause a greater risk to employees than if the asbestos had been left in place.*

*(4) The plan of work must include in particular details of—*

*(a) the nature and probable duration of the work;*

*(b) the location of the place where the work is to be carried out;*

*(c) the methods to be applied where the work involves the handling of asbestos or materials containing asbestos;*

*(d) the characteristics of the equipment to be used for— (i) protection and decontamination of those carrying out the work, and*

*(ii) protection of other persons on or near the worksite;*

*(e) the measures which the employer intends to take in order to comply with the requirements of regulation 11; and*

*(f) the measures which the employer intends to take in order to comply with the requirements of regulation 17.*

*(5) The employer must ensure, so far as is reasonably practicable, that the work to which the plan of work relates is carried out in accordance with that plan and any subsequent written changes to it.*

**L143 Extracts**

**Demolition work**

190 In the case of demolition or major refurbishment, the plan of work must specify that all asbestos is removed before any other major work begins, where this is reasonably practicable and does not cause a greater risk to employees than if the asbestos had been left in place.

191 Where removal of ACMs is time-consuming and resource-intensive and only involves lower-risk material such as textured decorative coatings containing asbestos, then removal before demolition or major refurbishment may not be reasonably practicable.

**HSG248 Analyst Guide:**

Inaccessible asbestos

*6.28 Where asbestos has been spray applied, there are often crevices or holes through walls where pipe work or girders run. These may contain asbestos but are impossible to clean so that all asbestos is removed. In these cases, the analyst may permit the use of non-flammable sealant such as foams or plaster to fill the hole and seal the asbestos within it. However, the analyst should be satisfied that as far as reasonably practicable, the asbestos has been removed before the sealant is applied. The client for the contract (eg building occupier) should be informed that this is the proposed course of action before the encapsulation takes place. It should be in the plan of work. The location of the sealant and remaining asbestos should be noted on the certificate of reoccupation, so that the client can record the presence of the asbestos in the management plan. If an analyst arrives on site to find that holes around the area where the sprayed asbestos was applied have been plugged with foam or other sealant, the contractor should be instructed to remove the sealant before the Stage 2 inspection begins.*

Use of encapsulant and sealant

*6.29 Where asbestos has been sprayed onto porous surfaces (eg breeze blocks) or onto tar, it is almost impossible to remove all the asbestos, sufficient to pass a visual inspection (see Figure 6.5). In these cases the analysts having satisfied themselves that further removal is not reasonably practicable, should advise the contractor and/or client to seal the residual asbestos with a permanent proprietary sealant. The visual inspection can then begin again once the sealant has been applied and dried. Encapsulation of asbestos in these instances should not take place before the analyst has seen the residual asbestos.*

*The findings of Stage 2 of the inspection should be recorded on the certificate of reoccupation. There should be confirmation that the airlocks and enclosure are free from visible debris and contamination, that all ACMs have been removed and that the interior surfaces of the enclosure are free from visible debris and settled dust. See Appendix 3. As for Stage 1, if problems are encountered during the Stage 2 inspection, the analyst must make a formal record of the scenarios encountered and the discussions and actions that took place to rectify them. The analyst should also make specific comments on the certificate of reoccupation if any asbestos is to remain (see paragraphs 6.28-6.29) and clearly identify the locations of these areas with a recommendation that this information should be entered into the management plan/asbestos register.*