

## Management of asbestos containing materials – Transport for London

### Background

In 2012, HSE updated the Control of Asbestos Regulations to fully implement the EU Directive on the exposure to asbestos. The new regulations acted as a catalyst for Transport for London's tube operations to consider how they were managing asbestos-containing materials.

A proposed three year strategy on improving the information held on asbestos was agreed by the London Underground Board in 2013 and the Asbestos Control Unit was allocated a specific budget for asbestos management for the first time. They restructured their asbestos register and introduced new station asbestos surveys. They also surveyed 600 line side buildings and produced plans which could be accessed through the register. The register has been updated to include information on substations and tenancies.



The ACU's current three year plan recommends:

- Station data be continually reviewed every year;
- Line side structures assessed every two years with those containing more high risk material done every year;
- Track sections assessed every two years; and
- Depots assessed annually because of their constant use and more frequently for those containing more high risk materials.

The whole purpose of this is to ensure the asbestos register is a live, up to date source of information that can be relied upon.

The new strategy also proposed a more detailed survey of platform inverts, currently presumed to contain asbestos, would be done over the next two years as and when access becomes available through the contract let for the cleaning of the inverts. A platform invert is the space below the platform created by the way it is constructed.

## TfL's Asbestos Register – How it is used.

The screenshot shows the homepage of the London Underground Asbestos Register. At the top left is the logo 'London Underground Asbestos Register'. A navigation menu on the left lists various documents and forms. The main content area features a central circular diagram with 'LONDON UNDERGROUND ASBESTOS REGISTER' in a blue box. Surrounding this box are red circles representing different areas: Stations, Station tenancies, Track, Asbestos faults, Helpful information, Depots, Gallery, Platform inverts, Lineside buildings, and Substations. Above the diagram, there are warning messages: 'All available asbestos surveys for LU stations, depots, track and lineside buildings can be found by clicking the relevant red button below.', 'These surveys are suitable for general maintenance works only.', and 'If your work penetrates the fabric of the building in any way you must arrange a demolition/refurbishment survey before works commence.' Below these warnings is an email address: 'If you need further assistance please email [asbestosregister@tfl.gov.uk](mailto:asbestosregister@tfl.gov.uk)'. On the right side, there is a red 'WARNING CONTAINS ASBESTOS' sign with the text 'Breathing asbestos dust is hazardous to health. Follow safety instructions.' Below the sign is the 'Asbestos Control Unit' logo and a grid of eight blue circular buttons: 'Asset Performance registration form AC1', 'LU projects registration form AC2', 'Asset Performance asbestos removal form AC3', 'Completion certificate submission form AC4', 'How to report an asbestos fault', 'How to report an asbestos incident', 'Track work permits', and 'Track & Signals asbestos awareness brief'.

Everyone in London Underground Ltd has access to their asbestos register through the Intranet which is available through a quick link. The register is subdivided into four areas stations, track, line side buildings and station tenancies. It is proposed that trains and engineering trains be added in the future.

Each location has a management survey plan, the surveyors report and photographs of the position of the asbestos containing material (ACM). Each ACM is given a risk scoring based on current use, occupancy and type of asbestos 18=high, 12 to 17 medium and below 11 low. It also made clear that these are management plans and therefore where intrusive work is planned more detailed surveys may be needed.

The register also contains a wealth of other useful information including access to [HSE guidance on asbestos](#), how to report asbestos faults and incidents, briefing on higher risk work such as track and signals and a photographic gallery of ACMs.

## Managing ACMs – maintenance and construction work

The image shows two screenshots of the London Underground Asbestos Control Unit (ACU) forms. The left form is the 'Asset Performance registration form AC1' and the right form is the 'Completion Certificate AC4'. Both forms include the ACU logo and the London Underground logo. The AC1 form is for registering work and includes fields for work location, dates, and contact information. The AC4 form is for confirming completion and includes fields for work location, dates, and contact information.

Before any work is started, the project manager must complete a form for maintenance works or and for major projects. This will list the type of work, location and confirm if ACMs will be encountered. It also confirms what the project manager must do to manage the risks. A form also is used to confirm completion of the work.

Where any ACMs are to be removed a form is completed setting out the location, type of work, and whether it is licensable and or notifiable to HSE.

If a station tenant wishes to carry out work, they are required to notify LUL before starting under their tenancy contract so they can be advised of the risks involved.

### Costs and benefits

The cost of surveying ACMs and development of their asbestos register was approximately £3m over three years. It costs about £450k per year to maintain and carry out re-inspections.

There have been three main benefits:

- A reduction in the risk of exposure to asbestos;
- A significant decrease in the number of asbestos faults reported resulting delays to maintenance works; and
- Less adhoc surveys needed to identify whether material contains asbestos.

The more robust asbestos management both reduces the potential for workers to be harmed by reducing the risk of exposure and long term will reduce the potential for compensation claims.

In addition, TfL estimate that they reduced ad-hoc survey costs by £72,000 over four years that would have been needed to identify if material contained asbestos. They have also reduced the number of lost work shifts caused by asbestos faults which

amounts to over £100k per annum. TfL have purposely kept this figure low for the time being as they have only just started to evaluate these costs. But as the years go on, and the information becomes more reliable and people become more practiced in using the information in their planning, this figure will increase.