

## **Duty Holder Inspection Project**

### **Evaluation of the Duty to Manage Asbestos on Offshore Oil and Gas Installations 2007/2008**

**SPC/ENF/135**

**Target Audience: Heads of Units, OSD1, OSD2**

<b>Date issued:</b> 2007-06-28	<b>OG Status:</b> Fully open
<b>Review date:</b> 2011-06-28	<b>Author Unit/Section:</b> HID Occupational Health Strategy Team

Purpose

Action

Background

Aims and Objectives

Project Arrangements

Further Information

Appendix - Questionnaire. Evaluation of the Duty to Manage Asbestos on Offshore Oil and Gas Installations 2007/2008

## **Purpose**

- 1 To inform IMTs of an (postal) inspection project which will investigate duty holder approaches to managing asbestos-containing materials (ACMs) offshore (see paragraph 4).
- 2 Establish the current level of compliance with Regulation 4, 'Duty to manage asbestos in non-domestic premises' of the Control of Asbestos Regulations (2006).
- 3 Follow-up with duty holders who have not taken significant steps towards compliance with Regulation 4.
- 4 Asbestos is a priority for HSE and is a key part of the OSD Occupational Health workplan, which was agreed by the DMM in December 2006. This project forms part of OSD's contribution to the Fit3 programme and its commitment to dealing with serious health risks. The project will contribute directly to the work of the Disease Reduction Programme (DRP).

## **Action**

- 5 Heads of Unit (OSD1 and 2) are requested to discuss this project with their IMTs and ask them to assist the HID Occupational Health Strategy Team (HID OHST) in identifying suitable contacts amongst their duty holders operating offshore oil and gas installations in the UKCS (there may be a number who will not need to be included because of previous contact, advice and/or action on this matter etc – this will be agreed with the relevant IMTs).
- 6 The information will be collected by a postal survey administered by the HID OHST. Involvement from the IMTs will be restricted to:
  - a) agreement to their duty holder involvement;
  - b) providing suitable contact details and facilitating contact as required; and
  - c) involvement in follow up action as required.

7 The questionnaire is given in the Appendix. It will be web based and supplied to the duty holders electronically. They will be able to respond electronically, which will assist both the duty holder in replying and HSE in analysis.

## **Background**

8 .Over 4000 people are dying from asbestos related diseases each year in GB. The largest group at risk are those in maintenance and building related trades such as carpenters, plumbers, electricians and cablers. These workers are particularly vulnerable because they can unknowingly disturb or work on ACMs. Similar activities which disturb the fabric of an installation and therefore ACMs, also take place offshore.

9 Although the remaining uses for asbestos were prohibited in 1999 (with a few time limited derogations for uses where there was no technically feasible alternative – now expired) it is estimated that around 4.4 million buildings still contain ACMs in Great Britain, with 2 million of these being in the non-domestic sector.

10 The main findings of the offshore (HSE/OSD) Asbestos National Inspection Programme (NIP) carried out in 1996/97 (concerning 17 duty holders) included:

- a) 82% of installations had some form of ACM onboard.
- b) Even if they were not aware of it most offshore companies still had asbestos on some of their installations albeit often (but not always, and quite the opposite in some cases) in low hazard forms (eg brake and clutch lining, gaskets etc).
- c) Management of asbestos seemed to be largely a reactive process. Few companies had management plans to control the risk from asbestos.
- d) The number of companies saying that they made use of their own expertise was high compared with the number saying that they had made asbestos assessments. It was likely that this reflected expertise being used only on an ad-hoc basis e.g. when asbestos was found or suspected during ongoing work.
- e) Only just over half of the installations had labelled asbestos.
- f) Awareness of asbestos hazards among employees offshore was quite high and concern low. But they were often not aware of its presence except when planned work on asbestos was going on.

11 There have been a number of incidents over the past two years where a lack of an asbestos management plan or ineffective application has lead to the disturbance of ACMs resulting in exposure to and spread of asbestos. Several improvement notices have been served and two incidents are under investigation (Q1, 2007).

12 As long as ACMs remain in good condition and are not disturbed, they will not cause any harm. However, disturbance will result in fibres becoming airborne, which if breathed in, are harmful to health. With this in mind, the Control of Asbestos at Work Regulations (2002) introduced a new Regulation 4, "Duty to manage asbestos in non-domestic premises" which came into force in May 2004. The regulation requires the person in control of the maintenance of non-domestic premises to:

- a) find out whether ACMs are present in their premises, where it is located and what condition it is in;
- b) presume that materials contain asbestos unless they can be sure they do not;
- c) record their findings;
- d) assess the risks from these materials;
- e) prepare and implement plans to manage the risks from such asbestos;
- f) provide information to anyone liable to come into contact with asbestos; and
- g) Review the plan and revise as necessary.

This regulation has passed unchanged into the new Control of Asbestos Regulations (CAR) (2006) which came into force in November 2006. This regulation is applied offshore by virtue of Regulation 34 of CAR.

13 The Regulatory Impact Assessment for CAWR (2002) estimated that around 3800 fatalities would be prevented over the next century.

## **Aims and Objectives**

14 The aim of this project is to obtain information on the current arrangements for managing ACMs on offshore oil and gas installations so that an evaluation of the extent of any future intervention required to ensure compliance with Regulation 4 of CAR can be determined and that the effectiveness of the duty to manage can be judged. This will include manned installations as well as other structures such as Single Point Moorings, Normally Unmanned Installations etc.

15 The specific objectives of this project are to:

- a) determine the extent of ACMs on offshore oil and gas installations;
- b) determine the current level of asbestos management (information will also be taken from the 1997 NIP);
- c) establish typical measures taken to manage asbestos; and
- d) judge the effectiveness of the Duty to Manage and plan future guidance, policy and operational interventions.

## **Project Arrangements**

16 The postal survey will be managed by the HID OHST in consultation with IMTs. The proforma in the Appendix will be sent (electronically) to an appropriate contact identified by the IMT. A period of 3-months will be given for completion. Where a duty holder has not returned the questionnaire after this period a reminder will be sent.

17 If after the reminder the questionnaire is not returned after a further 2-months consideration will be given between the HID OHST and the IMT to carrying out a specific Head Office visit.

## **Further Information**

18 The information will be analysed by the HID OHST using, where practical, the Risk Control Indicators (RCIs) as outlined in the 'FOD Inspection Pack for the Duty to Manage Asbestos in Premises'.

19 A summary of key findings will be circulated to IMTs and interested parties in other Directorates. The results will be used to judge the effectiveness of the Duty to Manage and plan future guidance, policy and operational interventions.

20 Consideration will be given to how the summary (and anonymised) data can be fed back to the industry.

21 For further information please contact the HID OHST (Damian Stear vpn 523 4656 – technical and Sandra Hincks for project administration).

**Appendix – Questionnaire. Evaluation of the Duty to Manage Asbestos on Offshore Oil and Gas Installations 2007/2008**

Contact details

Name:

Position:

Company (Name & address):

.....  
.....  
.....  
.....  
.....  
.....  
.....

Tel:

Fax:

Email:

**Q1.** In the table below, please indicate for each type of installation: the total number of assets your company operates, the range of ages, and how many have asbestos-containing materials (ACMs) onboard.

Type of installation	Number	Age range (years)	How many have ACMs onboard?
Fixed			
Semi-submersible			
Floating production, storage and offloading (FPSO)			
Jack-up drilling unit			
Drilling vessel			
Floating storage unit (FSU)			
Normally unmanned installation (NUI)			
Single point mooring (SPM)			
Other (please specify)			

**Q2.** In the table below, please indicate the types and approximate quantities of each type of ACM (combined across all your assets).

Type of ACM	Approximate quantity
Sprayed ('Limpet') coating	(in square metres)
Boiler/vessel lagging	(in square metres)
Pipe lagging	(in linear metres)
Asbestos boards <u>internal</u> wall panels (AIB, 'Millboard' etc)	(in square metres)
Asbestos boards <u>external</u> wall panels ('Durasteel' etc)	(in square metres)
Asbestos insulating board ceiling tiles	(in square metres)
Asbestos cement sheets	(in square metres)
Other ACMs such as bitumen products (eg external Galbestos panels), brake & clutch linings, arc chutes etc.	(Free text)

**Q3.** Following on from Q1, on what basis did you conclude whether ACMs are present on your assets?

Approach	You may tick more than one approach
----------	-------------------------------------

Survey	Note for web team – please insert tick boxes for each option
Presumption	
Combination of survey/presumption on individual installations	
Date of construction	
Plans	
Records of samples taken over a number of years	
Its all been removed in the past	
Other – please specify	

**Q4. Do you have a written policy and procedure for the management of ACMs?**

- Yes – Go to Q5
- No – Go to Q6

**Q5. What is your policy for managing the risk from ACMs?**

- Programme of planned removal
- Long term management
- Other – please describe

.....

.....

.....

.....

.....

**Q6. Do you have a nominated person(s) who is**

- Responsible for the management of asbestos at a corporate level?  
Yes  
No
- Responsible for the management of asbestos on each of your assets?  
Yes  
No

If you answered “yes” to either question please go to Q7, otherwise go to Q8.

**Q7. What type of training have the 'nominated person(s)' been given (if required, tick more than one)?**

- None
- 'Asbestos awareness training'
- 'Training for non-licensable work'
- In-house
- Consultant
- Other – please describe

**Q8. Do you have an asbestos register?**

- Yes – Go to Q9
- No – Go to Q11

**Q9. What form is this register in?**

- Electronic
- Paper
- Other – please describe

.....  
.....  
.....  
.....  
.....

**Q10. Who manages the register?**

- Medic
- Safety, Health and Environment Advisor
- Other – please stipulate

.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....

**Q11. Do you have a procedure to control maintenance work or other activities, which may disturb the fabric of the installation?**

a) Yes – please outline/provide a copy

.....  
.....  
.....  
.....  
.....

b) No – Go to Q13

**Q12. Does this procedure also consider unmanned installations such as NUIs, Single Point Moorings etc?**

a) Yes – please outline/provide a copy

.....  
.....  
.....  
.....  
.....

b) No

**Q13. Does your risk assessment and Permit System include a specific trigger for asbestos?**

- a) Yes – Go to Q15
- b) No – Go to Q14

**Q14. If not, how do you make sure that the presence of ACMs is considered during planning?**

- a) Knowledge of locations where ACMs have been used
- b) Rely on the planning team raising it during the planning process
- c) Personal knowledge
- d) Other – please describe

.....  
.....  
.....  
.....  
.....

**Q15. Does your planning system/procedure identify when a Type 3 'intrusive' survey is required e.g. pre-demolition/refurbishment?**

- a) Yes
- b) No

**Q16. When would you interrogate the asbestos register?**

- On an ad-hoc basis
- Always during the job planning process
- Only during planning for refurbishment or decommissioning.
- If you found a suspect material
- Other – please specify

.....  
.....  
.....  
.....  
.....

**Q17. How do you communicate information on the presence of ACMs to employees and others who need to know eg maintenance workers, contractors, visitors etc?**

- a) We don't
- b) Written e.g. risk assessments
- c) Verbal e.g. Tool box talks.
- d) Don't know
- e) Other – please describe

.....  
.....  
.....  
.....  
.....

**Q18. Do you have anyone on your assets such as the 'House Mouse', 'Handyman' or maintenance technicians who carry out routine maintenance tasks which could directly or inadvertently disturb ACMs?**

- Yes – Go to Q19
- No – Go to Q22
- All work involving ACMs is done by a licensed contractor – Go to Q22

**Q19. If yes, do you have any procedures for this type of work eg changing out CAF gaskets?**

- Yes – Go to Q19

- No – Go to Q20

**Q20. Who developed the procedures referred to in Q18?**

- In house – specify positions

.....  
.....  
.....  
.....  
.....

- Consultant
- Other – please specify

.....  
.....  
.....  
.....  
.....

**Q21. What training are the above trades provided with in relation to working safely with asbestos?**

- None
- Asbestos awareness training
- Training for non-licensable asbestos work
- In-house
- Consultant
- Other – please describe

.....  
.....  
.....  
.....  
.....

**Q22. Do you have a procedure to audit the management system to make sure that it is working effectively?**

- Yes

.....  
.....  
.....  
.....  
.....

- No – Go to Q24

**Q23. Who carries out the auditing?**

- Consultant
- Industrial Hygiene Advisor/Occupational Hygienist
- HSE Advisor
- Other – please describe

.....  
.....  
.....  
.....  
.....

**Q24. Do you buy in any external expertise**

- Yes – please specify

.....  
.....  
.....  
.....  
.....

- No

**Q25. Do you have copies of any of the following guidance on asbestos?**

- L127 “The management of asbestos in non-domestic premises”.
- L143, “Working with materials containing asbestos”.
- MDHS100, “Surveying, sampling and assessment of asbestos in premises.”
- INDG223(rev2), “Managing Asbestos in Premises.”
- HSG210 and 213, “Asbestos Essentials.”
- HSG247, “The Contractors Guide.”
- HSG248, “The Analysts Guide.”
- HSG189/2, “Working with asbestos cement.”
- Other?

.....  
.....  
.....  
.....  
.....