



Working with businesses
to deliver sustainable and
balanced compliance



Asbestos HSG 248 second edition (July 2021)
Asbestos: The Analysts' Guide
Changes and implications

Presentation Party:

John Evison – Director & Co-founder

Peter Cottam – Technical Director

HAMMAR Southwest
Technical Briefing Day

Agenda

1. Introductions
2. Backdrop to guidance change
3. Taking samples during a survey
4. Analysing the samples in the lab
5. The importance of being impartial
6. Air monitoring on site
7. Key things to take away
8. Q&A

01
Introductions



iON Consultants – a new approach to compliance and assurance in the built environment

Meet the iON team:

- Julian Ransom – instrumental in guidance change
- John Evison – business leader in the asbestos industry
- Peter Cottam – previously UKAS Assessment Manager
- Richard Bennion – previously Group Head of Property Safety & Compliance at RMG

Procurement | Management | Assurance

Introductions

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02

Backdrop to guidance
change

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Backdrop to guidance
change

- Post Grenfell new Building Safety Act 2022 establishing a new focus on independent assurance and monitoring for building compliance
- Long delays in release and implementation of HSG248
- Conceived to improve standards in asbestos testing
- HSE roadshow with JR raised awareness of the impending changes
- How will this affect dutyholders?

03

Taking asbestos samples during a survey

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Key changes

1. Textured coating – two separate samples per surface
 - Non-homogeneous material
 - Greater chance of identifying asbestos fibres
2. Guidance on the sampling of stone – dolomite, basalt, soapstone, talc, marble and vermiculite
 - Trace amounts have been found within these materials in buildings
3. Specific guidance on dust/wipe sampling
 - The HSE is not recommending dust or wipe samples unless there is evidence of contamination.

Taking samples during
a survey

Implications

- Increase in sample volumes – additional cost and time delays
- Fabric repair – cost and time delays
- Damage to stonework – difficult repair and possible removal of expensive materials or added re-inspection costs
- Wipe/Swab Tests - Less chance of areas being cleaned multiple times

HSG248 – 4.10

‘Sampling and analysis of asbestos in settled surface dust is not recommended except in specific circumstances...’

HSG248 – 4.13

‘The implications of small numbers of asbestos fibres in dust are quite different from the presence of visible asbestos debris and fragments.’

‘Overstated claims and imprecise reporting may lead to undue anxiety for the client and occupants’

Taking samples during
a survey

04

Analysing the samples
in the lab

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Key changes

- Higher % of daily checks of samples
 - Lead to more accuracy in the reporting of results.
- 2 points for negative samples
 - Negative samples will be analysed for longer meaning more chance of correct reporting
- Timings recorded for sample analysis
 - Ensures the lab analyst spends sufficient time analysing the samples
- Defined methods for sample preparation
 - Chemical preparation ensures no asbestos elements can be dissolved to allow fibres to be easily viewed, improving detection levels

Analysing the samples
in the lab

Implications

- **Time**

- Analysis will take longer for each sample
- Analysts can still complete 60 samples per day, but many will be re-analysis, therefore less client samples
- More analysts are required to perform the same amount of client analysis

- **Accuracy**

- Reporting of results should be more accurate
- Re-issuing of reports should be less common

- **Cost**

- Costs may increase as labs can analyse less samples and require more staff

Analysing the samples
in the lab

Maximum Client Samples – a numbers game!

Textured Coating			
Period	Old HSG248	New HSG248	Difference
Week	160	155	-5
Month	640	620	-20
Year	7680	7440	-240

Negative			
Period	Old HSG248	New HSG248	Difference
Week	280	155	-125
Month	1120	620	-500
Year	13440	7440	-6000

Should labs have anticipated this?

- First mentioned in the May 2021 v1
- Labs allowed until December 2021 to be accredited to new guidance
- All labs transitioned to the new guidance Feb 2022

Analysing the samples in the lab

06

The importance of
being impartial

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relation or from a
point of view.
Impartiality [im-
treating or affect
all equally, equa
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or from

Key changes

- **Strongly** recommended that clients employ analysts separately from Licensed Asbestos Removal Contractor (LARC)
- Organisations with links to LARCs **should not** be performing 4 stage clearances (4SCs). These links may be through:
 - shared ownership
 - holding companies
 - common management structures
 - or where the organization performs a high % of work
- If links are unavoidable the asbestos consultant needs to declare links with LARCs in writing
- Links can be for individuals, not just organisations

The importance of
impartiality

Implications

Why is it important?

Dual links between the LARC and AC can drive down the quality of the visual inspection:

- Pressure placed on analysts
- Pressure placed on the LARC

What can you do?

- Check for links on Companies House
- As part of their UKAS accreditation laboratories are required to:

‘...identify risks to impartiality on an on-going basis.’

ISO/IEC 17025:2017 4.1.4

05

Air monitoring on site
during asbestos
remediation

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Key changes

- 5% of all 4 Stage Clearances are checked 'blind'
 - To check the analyst after the visual inspection, but before handed back to the client
- At least 5% of completed 4 stage clearance certificates checked
 - Can pick up on obvious errors on site
- Each analyst is audited 4 times per year (with reasonable intervals)
 - Ensure more scrutiny of the analyst

Air monitoring on site during asbestos remediation

Air monitoring on site
during asbestos
remediation

Implications

What to look out for?

- More requests to return to site
- Auditors will be on site more often
- Certificates should be reissued more frequently

What checks can you make?

- Ask for copies of audits undertaken on your sites
- Request 'blind' re-inspection % for your premises - review performance of analysts who work on your premises
- Specifically ask for failures and review how these are dealt with – were you informed?
- Most importantly – ask how their checks are **independent**

07

Key things to take away



Key things to take
away

1. HSG248 relates to the survey process too
2. Designed to improve standards
3. More samples during surveys – increase in repair costs and delays in reports
4. Unavoidable delays in the laboratories as costs have increased by a third – delays in report delivery and higher costs
5. Ensure there is impartiality between laboratories and removal contractors
6. Verify the 4SC and removal audit process is **independent**
7. Have your suppliers updated you on these changes, if not, why not?
8. Asbestos data management – consider what additional information is to be captured post 4SC

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Q&A Session

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