



# **ASBESTOS** REINSPECTION REPORT Client Peldon Rose Site St Dunstan's OpCo Ltd , 20 St. Dunstan's Hill, London,, EC3R 8HL Date report issued 21st March 2023 Recommended Date for 15th March 2024 Reinspection Survey reference J853079 Lead surveyor Dan Watson Assistant surveyor N/A UPRN N/A No. of Asbestos Risks Identified Category A 0 0 Category B Category C 1 0 Category D Areas not accessed (Presumed asbestos) 0

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Dan Watson	
Josh Senior	

Surveyor Signature:

Approval Signature:

### 1.0 INTRODUCTION

Tersus Consultancy Ltd of 1st Floor Rainham House, Manor Way, Rainham, Essex received instructions from Carrie Lord of:

Peldon Rose, 26 Worple Road, London,, SW19 4EE

to undertake an asbestos reinspection, to HSG 264 standard, of:

St Dunstan's OpCo Ltd , 20 St. Dunstan's Hill, London,, EC3R 8HL

Works were carried out on-site during the period 15 Mar 2023 to 15 Mar 2023. The Lead Surveyor was Dan Watson

Records of previous surveys by Tersus:

Job Number	Survey type	Date of survey
J363725	Reinspection survey (MA only) + Management Plan	16/11/2018
J465230	Reinspection survey (MA only) + Management Plan	21/11/2019
J546513	Reinspection Survey (MA only) + Management options	23/11/2020
J656636	Reinspection Survey (MA only) + Management options	08/11/2021

### The agreed scope of works included:

Reinspection of previously identified items

### **Building notes:**

Commercial

The building was occupied during the time of the survey.

Re-Inspection survey to all accessible previously sampled positive, presumed and no accessed items only.

### 2.0 EXECUTIVE SUMMARY

The extent of this inspection was to undertake a reinspection of known/presumed asbestos as defined in HSG264. The purpose of this survey is to assist the client in complying with requirements of the Control of Asbestos Regulations 2012.

The purpose of a reinspection is to review the condition of all known/presumed ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation. Depending on the original agreed scope, additional samples may have been taken to verify whether or not items identified during this inspection, that were not previously registered, contain asbestos fibres.

Information on the results of this inspection is detailed within report, including appendices and annotated drawings (where instructed to do so). The report and asbestos register must be maintained as one document, as all sections record information on the surveyor's opinions, findings and limitations.

Within the scope of this survey the findings were as follows:

### **ACMs identified:**

### ACMs Recommendation summary:

Remove:	0
Encapsulate & Manage:	0
Manage:	1

Full details of any ACMs requiring action, can also be found summarised within the 'Action Plan'. Details of all identified, presumed and strongly presumed asbestos can be found in the 'Asbestos register'.

#### Non-accessed areas:

Number of non-accessed areas:	0
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Non-accessed areas are noted within the 'Non-accessible areas register'. Any areas or items not accessed must be presumed to contain asbestos until such a time as full access and inspection can be undertaken.

Tersus can assist in compiling asbestos management plans, on-going re-inspection and assisting with the management of asbestos remediation.

# **Action Register**

The following table summarises the asbestos-containing materials (ACMs) that require action based on our assessment of the ACMs identified, strongly presumed and presumed at St Dunstan's OpCo Ltd.

The Control of Asbestos Regulations place a duty on the duty-holder, as the person with the best understanding of the building and its use, to ensure a suitable and sufficient assessment is undertaken and that a management plan is drawn-up.

The recommended actions are provided here to assist in that assessment and management plan. Actions are subdivided into the following categories: Restrict Access, Remove and Encapsulate/Repair. Items that do not require remediation to reduce the risk are not included in this section. Please refer to Sections 3.0 and 4.0 for details.

	Building	Floor Level	Room	Item/Inspection Reference	Item Description	Risk Category	Recommended Action
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No asbestos materials observed or detected that require remediation. Refer to section 4.0 for details of ACMs that require monitoring / managing.

### **Definition of Recommended Actions**

Remove	Restrict Access / Remove (due to an immediate risk) - Restricting access and/or removal of asbestos containing materials is recommended on the basis that its condition, location could result in exposure to persons, spread of asbestos, or release to the environment. Remove (Refurbishment) - It may be that the identified materials need to be removed ahead of any refurbishment or maintenance works.
Encapsulate/ Repair, then manage	Apply encapsulant coating to the asbestos material to safely contain the fibres. Encapsulation is an alternative to removal, where reasonably safe and practicable. Manage within the asbestos management plan once repaired.
containing damaged as	there may be a requirement to prohibit access to a location that has been identified as sbestos materials and poses a hazard. In addition, air testing may also be recommended to anal control measures are required.
	Where asbestos is left in-situ or an area has not been accessed during the survey, the person responsible for the premises has a duty to develop and implement a management plan to help prevent accidental damage and exposure occurring. This plan should ensure that:
Manage	<ol> <li>a current record of the location, condition, maintenance and removal of asbestos- containing materials (ACMs) and/or areas of no access is kept;</li> <li>the ACMs are maintained in a good state of repair through regular monitoring;</li> <li>where there are areas of no access, these are presumed to contain asbestos until proven otherwise;</li> <li>people are informed of the locations of ACMs to prevent accidental disturbance;</li> <li>arrangements are in place to ensure that work which might disturb the ACMs, complies with the Control of Asbestos Regulations (CAR);</li> <li>the plan is reviewed at regular intervals so that it remains relevant.</li> </ol>
	Regulation 4 of CAR requires known and presumed ACMs to be monitored for any deterioration in their condition. How often the ACMs need to be checked varies depending on the type of ACM, its location and the activities around it, but the frequency of monitoring should not exceed 12 months. In some situations, the labelling of ACMs can assist with monitoring and management.

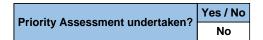
## Non-Accessed Areas Register

The following table summarises specific areas at the property that were intended to be included in the reinspection but have not been inspected, for the reasons provided below. These areas should be presumed to contain asbestos until proven otherwise.

Building	Floor level	Room	Item / Inspection Reference	Item Description	Position	Comments		
All areas within the scope and limitations of this survey were accessed.								

### 3.0 Asbestos Survey Findings

The following table(s) list the areas included in the survey, whether asbestos was found or not and whether the area was accessible or not. For further details on room notes, the risk assessment scores, risk categorisation, recommendations and photographic records, refer to Section 4.0. Asbestos types marked with an (\*) are strongly presumed to be visually consistent with other asbestos items identified at the site.



Building			Room Notes							
Floor Level	Room	Item/ Inspection Reference	Item Description	Item Location	Asbestos Type	Extent	Risk Category	Recommended Action	Material Status Change	
External	External building	#2	Parapet lining	Walls	Amosite	150lm	С	Monitor and manage	Encapsulated	Reinspection survey only.
Z-Sub Level 1	front lightwell	#1	cement panels	durasteel doors	No Asbestos Detected			None required		

#### 4.0 SAMPLE AND RISK ASSESSMENT INFORMATION - Please also refer to Appendix 1 - Survey Methodology and Limitations.

Kenn (Incomention Defe			Due dougt to man		
Item / Inspection Ref:	#1	- <b>&gt;</b>	Product type:		
Sample Ref:	JC011847	Na Asse:	Condition / Damage:		
Survey date:	15/03/2023	essr	Surface Treatment:		
Date last inspected:	21/11/2018	Material Assessment	Asbestos Type:		
Next inspection due:		-	Material Score:		
Building:	Main Building		Occupant Activity:	N/A	
Floor level:	Z-Sub Level 1		Location:	N/A	
Room:	front lightwell	Priority	Accessibility:	N/A	
Position:	durasteel doors	rity	Extent/amount:	N/A	
Item Description:	cement panels	Ass	Number of Occupants:	N/A	
Level of Identification:	SAMPLED	essr	Frequency of Use:	N/A	
		nent	Time in Area:	N/A	
Action:	Name required		Maintenance activity:	N/A	
Action:	None required		Frequency of Maintenance:	N/A	
RISK CODE:	No Asbestos		Priority Score:	N/A	
RISK CODE:	INU ASDESIUS		Total Score:		
0					Material Status Change:
Comments:					
			-		
Item / Inspection Ref:	#2	_ 、	Product type:	3	
Sample Ref:	E01 {JC011848}	Ass	Condition / Damage:	0	

item / inspection Ref:	#2		Product type:	3		
Sample Ref:	E01 {JC011848}	Ass	Condition / Damage:	0		
Survey date:	15/03/2023	Material ssessme	Surface Treatment:	1		
Date last inspected:		Material Assessment	Asbestos Type:	2		
Next inspection due:	15th March 2024	-	Material Score:	6		
Building:	Main Building		Occupant Activity:	N/A		
Floor level:	External		Location:	N/A		
Room:	External building	Priority	Accessibility:	N/A		
Position:	Walls	rity.	Extent/amount:	N/A	150lm	terretira (199
Item Description:	Parapet lining	Ass	Number of Occupants:	N/A		
Level of Identification:	SAMPLED	essn	Frequency of Use:	N/A		
		nent	Time in Area:	N/A		
Action:	Monitor and manage		Maintenance activity:	N/A		
Action:	Monitor and manage		Frequency of Maintenance:	N/A		
RISK CODE:	C		Priority Score:	N/A		
RISK CODE:			Total Score:	6		
Commonto:	No change 15/02/22					Material Status Change:
Comments: No change 15/03/23						Encapsulated

## **APPENDIX 1 - SURVEY METHODOLOGY AND LIMITATIONS**

#### Methodology

#### **Asbestos Reinspection**

A re-inspection survey is a periodic attendance to assess the condition and surface treatment of known and suspected asbestos containing materials and to advise of any actions required in order to assist with compliance with CAR2012.

Each proven/presumed asbestos containing material was inspected individually. All material assessments have been completed during the inspection, including priority assessments if required as part of the contract.

Only proven and presumed Asbestos Containing Materials have been assessed during this reinspection process. No additional survey inspections were undertaken.

If original primary inspection data was undertaken by a third party, Tersus cannot be held responsible for the validity of any testing or inspection data. All third-party data supplied to Tersus for re-inspection has been taken at face value and cannot be validated without a full sampling survey being conducted at the premises.

Details of any third-party information supplied is detailed within this report. Reinspection assessments are undertaken using in house procedures based on HSG 264 & HSG 227.

Priority assessment scores, where included, are not part of Tersus' UKAS accreditation as an inspection body and are only undertaken to provide a representation of the circumstances at the time of inspection. Any additional information supplied by the client after the survey will not have been taken into consideration. The client is advised to refer to HSG 227 for guidance on how to conduct a priority assessment, should this be required following the reinspection.

The reinspection does not represent a full survey therefore it may be possible that asbestos containing materials may remain unidentified at the site. Furthermore, the surveyor may have re-sampled materials to aid in the reinspection process.

All inspections and any sampling were carried out in accordance with our UKAS accredited Quality system and guidance publication HSG 264 Asbestos: The Survey Guide.

Methods used to carry out the survey were agreed with the client prior to any works being carried out. All reasonable attempts were made to access all areas within the scope of the survey. Areas not accessed that were intended to be included in the survey, are reported in the executive summary; further details are provided in sections 3.0 and 4.0. Our surveying work is carried out in line with published guidance and our in-house procedures.

#### Sampling

Sampling is carried in line with published guidance and in-house procedures. The number of samples collected is dependent on the extent and range of materials present and the extent of variation in those materials. In addition, the occupancy and operation of a site may also have an impact on the ability for sampling to take place safely. This being so, the surveyor will determine an appropriate and representative sampling strategy at site during the survey. Materials that are not obviously asbestos (e.g. brick, glass, wood) will not be sampled, but may be detailed in the room notes.

Findings with the survey report, including samples are referred to as follows:

**Sampled items** - these are identified by the following reference number format e.g. J999999#01. The item has been sampled and will have been analysed for asbestos using polarised light microscopy to determine whether asbestos is present and the type of asbestos fibre.

**Strongly Presumed** - these items are identified by the following reference number format e.g. As Sample J99999#01\*. Such items are observed to be visually consistent with a similar material sampled within this survey.

**Presumed** - these items are identified by the following reference number format e.g. J999999#Presumed. Such items have not been sampled but may contain asbestos and/or it is unsafe to obtain a sample. Asbestos may also be presumed to be present in inaccessible areas.

#### Samples of textured coating

The sampling of textured coating is undertaken carefully, in-line with published guidance and our in-house procedures. However, the asbestos fibres in textured coating are not uniformly present and this can make the positive identification of asbestos fibres in samples difficult. Therefore, it is recommended that where a building/area is proven to contain asbestos textured coating through sample analysis, that all textured coating in that building/area is assumed to contain asbestos, irrespective of any analysis that indicates otherwise.

#### Samples of dust

Unless specifically requested by the client the sampling of dust has not been undertaken. Guidance in HSG248 states that sampling and analysis of asbestos in settled dust is not recommended except in specific circumstances where the spread of asbestos from a substantial recent release incident is being investigated - it should not be routine or part of a bulk sampling programme.

Sampling is not advised due to the technical difficulties (e.g. efficacy of collection methods) and surface deposit/settled dust variability (i.e. representativeness) as well as uncertainties in the statistical relevance and in the assessment and evaluation of risk that arises from the detection of low numbers of fibres.

#### Soil and made ground

This report does not include any sampling for asbestos in soil and/or made ground.

#### Inaccessible areas within scope

Although every effort was made to access all areas of the building it is possible that concealed cavities, floor voids etc will only be accessible during actual demolition. The client's management plan should include arrangements to mitigate any latent risks relating resulting from areas not accessed.

# Potential asbestos containing materials or areas of the buildings that were inaccessible must be presumed to contain asbestos until proven otherwise.

#### **Miscellaneous**

All quantities given are approximated without the use of measuring aids. The quantities are for guidance purposes only and Tersus do not take any responsibility for the accuracy of the quantities.

Materials have been referred to as Asbestos Insulating Board or Asbestos Cement based on content and visual appearance alone. Water absorption tests on materials have not been carried out unless otherwise stated.

The survey report remains the intellectual property of Tersus until full and final payment has been received. On settlement, the information in this report remains the property of the client only and does not allow for or imply any collateral warranty to third parties.

#### LIMITATIONS & RESTRICTIONS

An asbestos reinspection will only include previously identified items of asbestos or specific previously inaccessible rooms/items. Therefore, access restrictions reported in here will be limited.

However, restrictions can place constraints on the inspection process, due to the need to protect health and safety, structural stability, security and/or or weather tightness of the property, on completion of the survey.

Access limitations may trigger the need for a re-visit when the restrictions can be safely lifted and/or may require specialist contractors, or demolition works. Materials, products, items and areas not identified in this report should be presumed as asbestos containing in the absence of information to the contrary. Please contact the Tersus contract team in the event additional work is required or for more advice.

Additional asbestos containing materials (ACM) may be present behind or above suspected/known ACM and so additional surveying may be required in these areas, which is beyond the scope of this reinspection.

We are unable to quantify/qualify nor report on asbestos in these areas, as follows:

• Unknown/unseen materials, where the extent and presence of these is not evident due to inaccessibility or insufficient knowledge of

the structure at the time of the survey, have not been reported herein.

• Known areas within the scope which have not been accessed, for the reasons given herein, including some products and 'live' plant.

#### Plans

If plans of the premises to be inspected are not made available for the reinspection, this can lead to areas not being clearly identifiable which may result in some items not being reinspected.

#### **Reasonable access**

Furniture, fixtures or fittings shall be moved where possible during the survey. Access to areas obstructed by these items where known will be restricted and have been recorded within the survey report.

Access to voids, risers, ducts etc. was made through existing removable access hatches, panels, ceiling tiles etc. which can be replaced in the same condition. Where excessive damage is required especially in occupied areas this will be recorded as a no access.

Site conditions at the time of the survey may mean that floors under large carpeted areas have not been surveyed in their entirety; the carpeted area may be very large, have furniture placed upon it, or it may be stuck down etc.

Where materials exist at a height and these were beyond which it was reasonably practical to access the materials have been visually determined and presumptions may have been made.

#### **Potential Access restrictions**

Any known and identifiable potential access restrictions will not have been recorded in this reinspection as these should be documented within the original survey report upon which this reinspection will be based.

Examples of typical access restrictions are as follows:

Service ducts, risers, voids and cavities (concealed under floors, in voids etc.) We have not inspected flues, ducts, voids and any similar enclosed areas where access would have necessitated the use of specialist equipment or tools, or which would have caused damage to decoration, fixtures, fittings or the structure of the building.

Live mechanical and electrical services i.e. in the absence of an isolation certificate or similar.

Lift shafts, where installed.

Un-boarded or unsafe roof / loft spaces and any area at excessive height.

Into concrete slabs.

#### **RISK ASSESSMENT PROCESS**

#### **Material Assessment**

Number scores are allocated to ACM depending on product type, extent of damage/ deterioration, surface treatment and asbestos type (which shall be scored as Crocidolite (blue) asbestos unless similar samples show otherwise or it is likely that another type of asbestos is almost always used).

ACMs with scores of 10 or more are regarded as having a high potential to release fibres if disturbed, 7-9 medium potential, 5-6 low potential and 4 or less very low potential.

These scores and other recorded observations, which are perceived as being likely to affect the release of asbestos fibres, are then used to allocate a risk code, which provides some basic advice on how the ACM should be treated in our opinion.

#### **Material Assessment Algorithm**

Sample Characteristic	Score	Example description
Product Type	1	Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi rigid paints or decorative finishes, asbestos cement etc.)
	2	Asbestos insulating board, mill boards, other low-density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt.
	3	Thermal insulation (e.g. pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing.
Extent of Damage	0	Good condition: no visible damage
(Condition)	1	Low damage: a few scratches or surface marks; broken edges on boards, tiles etc.
	2	Medium damage: significant breakage of materials or several small areas revealing loose fibres
	3	High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris
Surface Treatment	0	Composite materials containing asbestos: reinforced plastics, resins vinyl tiles
	1	Enclosed sprays and laggings, asbestos insulating board (with exposed face painted or encapsulated), asbestos cement sheets etc.
	2	Unsealed asbestos insulating board, or encapsulated lagging and sprays
	3	Unsealed laggings and sprays
Asbestos Fibre Type	1	Chrysotile
	2	Amphibole asbestos excluding crocidolite
	3	Crocidolite

#### **Priority Assessment**

This report does not include priority assessed items. The duty-holder can utilise the information below to undertaken the priority assessment, if required. Number scores are allocated to each ACM location to assess the risk of someone disturbing the ACM. Factors assessed are, Occupant Activity, Likelihood of Disturbance, Human Exposure Potential and Maintenance Activity.

The Priority Assessment scores are added to the Material Assessment scores to provide an overall risk assessment for each ACM. ACMs with scores of 19 or more are regarded as being at a high risk, 13-18 medium risk, 9-12 low risk and 8 or less very low risk.

These scores are then used to allocate a risk code to assist in the prioritisation of mitigation actions to reduce the risk.

**IMPORTANT:** The priority assessment should be based on that detailed within HSG227 - A comprehensive guide to managing asbestos in premises - 2002 and where provided. Should you require any further assistance with that, please contact us.

#### **Priority Assessment Algorithm**

Sample Characteristic	Score	Example description
Normal Occupant Activity	0	Rare disturbance activity (e.g. little used store room)
(Repeat for secondary activities as necessary)	1	Low disturbance activity (e.g. offices)
	2	Periodic disturbance (e.g. industrial or vehicular)
	3	High levels of disturbance (e.g. fire door with asbestos insulating board sheet in constant use)
Likelihood of disturbance		
Location	0	Outdoors
	1	Large rooms or well-ventilated areas
	2	Rooms up to 100m <sup>2</sup>
	3	Confined spaces
Accessibility	0	Usually inaccessible or unlikely to be disturbed
	1	Occasionally likely to be disturbed
	2	Easily disturbed
	3	Routinely disturbed
Extent/amount	0	Small amounts or items (e.g. gaskets, fuse linings)
	1	<10m² or <10m pipe run
	2	>10m² to ≥50m² or >10m to ≥50m pipe run
	3	>50m² or >50m pipe run
Human exposure potential		
Number of occupants	0	None
	1	1 to 3
	2	4 to 10
	3	>10
Frequency of use	0	Infrequent
	1	Monthly
	2	Weekly
	3	Daily
Average time in use	0	<1 Hour
	1	>1 to <3 Hours
	2	>3 to <6 Hours
	3	>6 Hours
Maintenance activity		
Type of maintenance	0	Minor disturbance (e.g. possibility of contact when gaining access)
	1	Low disturbance (e.g. changing a light bulb in asbestos insulating board ceilings)
	2	Medium disturbance (e.g. lifting one or two asbestos ceiling tiles to gain access)
	3	High levels of disturbance (e.g. removal of numerous asbestos insulating board ceiling tiles)
Frequency of maintenance	0	ACM unlikely to be disturbed for maintenance
	1	≤1 per year
	2	>1 per year
	3	>1 per month

#### **Risk Category Selection**

# HIGH RISK (A) - 19 points or more with the Priority Assessment and Material Assessment combined, 10 points or more with only the Material Assessment.

This is the highest risk category level and ACMs in this category require urgent action to reduce the risks. Items in this category are either damaged and/or friable and may be in a position likely to cause an exposure to occupants. In most cases it would be necessary to prevent access to the area and plan for remediation. Typically, this will mean removal of the material, however in certain circumstances encapsulation or repair may be possible.

MEDIUM RISK (B) - 13-18 points with the Priority Assessment and Material Assessment combined, 7-9 points with only the Material Assessment.

This category indicates that there is a potential for asbestos fibre release to occupiers. Remediation of the ACM will normally be necessary, such as encapsulation or repair. In some cases it may be necessary to prevent access or occupation. Following remediation measures, normal management procedures should be followed (e.g. annual inspection for damage).

LOW RISK (C) - 9-12 points with the Priority Assessment and Material Assessment combined, 5-6 points with only the Material Assessment.

This category indicates that there is a low risk overall from the material due to its characteristics and/or there is a low possibility of accessing the material. Normal management procedures should be followed (e.g. annual inspection for damage).

VERY LOW RISK (D) - 1-8 points with the Priority Assessment and Material Assessment combined, 1-4 points with only the Material Assessment.

This category indicates that there is very low risk of the ACM releasing fibre into the air, or that it is so remote from the occupants that any airborne asbestos would not be present in the breathing zone. Normal management procedures should be followed (e.g. annual inspection for damage).

# **APPENDIX 2 - BULK ANALYSIS CERTIFICATE (IF APPLICABLE)**

No additional samples were taken during the course of this survey.

# **APPENDIX 3 - ANNOTATED PLANS (IF APPLICABLE)**