OXYL8 Initial TExT Template (in MS Word)

**Notes:-**

1 The Template is provided for all delegates to use if they wish as a basis for their own TExT Template. It is provided on a free to use licence basis although OXYL8 Ltd do retain copywrite.

2 This template is not HSE approved, however it has been discussed at length with HSE LEV specialist representatives who have made observations and suggestions as to its format and layout. It is therefore as close as it gets to a template which is likely to be acceptable to HSE.

It may be that for some LEV systems and processes that the template is ‘over complicated’ but …. in most situations this will represent the full standard required,

3 Recent feedback from HSE Inspectors has indicated that they are seeing TExT templates that more closely accord with CoSHH requirements than before ….. however, they are concerned that in many cases TExT Examiners are not filling the forms in correctly or appropriately.

4 Be aware that boxes should be filled in and not left blank. If the box does not apply – say so (using eg N/A or N/R etc). If the information required for the box cannot be obtained (for operational or safety reasons etc) – say so!

5 HSE have accepted that some boxes – eg Methodology, Instruments used, References, etc may be common to a number of TExT reports being undertaken at a single location. In such cases they have accepted that these boxes could be removed from the Form and put as an Introduction to the set of TExT Reports for that location.

6 HSE are currently inviting LEV TExT Examiners to visit their offices to discuss (and justify) their TExT Methodologies and their Report layout and contents.

 Be warned – and be aware!

**Observations:-**

Published requirements for TExT and guidance on best practice – coupled with information gathered from recent discussions with HSE have highlighted the following issues/ observations (not in any specific order) relevant to TExT Inspections and Reports etc.

* **Test as Found!** – Normally where undertaking TExT and servicing – would test “*as found*” and then reconsider TExT results after servicing. Significant performance changes between pre and post servicing TExT results could cause tester to comment on appropriateness of frequency of servicing and/or client maintenance.
* **Hoods?** - State hood type and shape as well as size in reports
* **No Risk Assessment?** – HSE have commented that if there is no Risk Assessment then TExT examiner should carefully consider the specific situation and – in some cases – TExT surveyor may need to say that as a result the TExT was “**inconclusive**”?
* **Duct Velocity Test Point Position?** - When measuring in ducts if cannot get test point at a position greater than 4 duct diameters downstream of turbulence etc – then say why could not do so in the TExT Report
* **Duct Velocities measured below Transport Velocities – Pass or Fail?**  *“That would depend on the process and the substance. If it was a low use, intermittent process – and internal examination showed to be clean …. then probably ‘Pass’. If it was a heavier use process and/or substance foreseeable would drop out ….. then probably ‘Fail’*.

HSE made clear they would expect internal examination at every TExT .

Do therefore prove that you have internally inspected ducts at every Test Point (use borescopes – and images(?) if necessary).

* **Captor Hoods/Captor Distances?**

*“Would like to see all TExT Examiners putting “****Effective Distance****” stickers on CAPTOR hoods. HSE wants calculated Captor Distances (using Fletcher’s Equations) put on hood stickers – not simply using smoke on its own to make that decision. But do use smoke release to prove that ‘control’ goes at least to that distance.* [**Use OXYL8 App – Android or IOS or the Excel spreadsheet version – both of which are free and use Fletchers Equations**]

* **Process Observation?** *“Concerned that TExT examiners were not observing the processes and how the operator used the hood. These observations should be noted in TExT Reports.*

*If operator was not working within the Captor Distance that would not necessarily be a FAIL in its own right but could use an “Amber” Satisfactory marking – meaning the*

*LEV Control itself was found to be Satisfactory but a ‘Caution’ due to improper use by the operator.*

* **Initial Operating Parameters** – Be careful of erroneously interpreting this as “*does it still do what it initially did*” rather than the correct “*does it do what Reg 6 and Reg 7 requires?*”
* **Hood Static Pressures?** - Static Pressure should normally be taken behind every hood as it is a very important measurement! (If Routine TExT) - compare with values obtained at Initial TExT
* **Occupational Hygiene Monitoring?** – Do remember to ask if occupational hygiene monitoring has been carried out in the area relative to the LEV being tested! In some cases the LEV system could potentially be assessed as ‘*Control Not Determined*’ without this – depending on circumstances.
* **Instruments for Measuring Face Velocity at small Hoods.** HSE *Horrified to learn some testers using Rotating Vanes at small captor hoods!*
* **Does HSE expect TExT examiner to comment in the TExT regarding DSEAR/ATEX issues discovered (eg badly installed filters, explosion relief panels etc etc)?** – *“Yes” otherwise HSE sees it as a breach of the TExT Examiner’s duties under S3 of HSWA! Not insisting it’s incorporated into the TExT report – could be in a separate sheet/report …… but it Must be Reported.*
* **Hood Indicators/Gauges?** *“HSE fell short of saying they would demand it in every situation …. but they are expected.* *Although not mandatory – would definitely expect to see them on new hoods and on filters – especially recirculating filters”.*
* **Can TEXT/Commissioning Engineers combine their Reports in to one** (saving lot of duplication)? “*Yes – but each test has specific requirements and data to be recorded. So long as this is recognised, HSE saw no reason why could not be combined in to one Report”*
* **Duct Test Points (in wrong place)?** - If in wrong place – explain to duty-holder why a new one is required and where it should be installed**. Label old one “Not to be Used”**. Ensure old holes are sealed correctly.
* **Commissioning Reports Missing or of Poor Standard.** “*HSE are generally concerned at the frequently poor standard of Commissioning that they see and that this was an area they were looking at*
* **Satisfactory/Unsatisfactory marking box coloured backgrounds.** “*Red/Green coloured backgrounds preferred - to make it easier for the Client to understand and immediately obvious what the final assessment was. Discussed the option of* ***Amber*** *backgrounds on a Satisfactory TExT Report and HSE’s view – could see a point for this where there was ‘Satisfactory’ control being achieved but with ‘Cautions’ (eg operator not working correctly at hood/control)”*.
* **Recirculating Filters?** *“This was an area where the TExTs on such systems frequently did not properly incorporate the CoSHH ACoP requirements or adequately assess risk. It was agreed that there was currently insufficient guidance/information around as to what and how to test. Testing of the recirculation effectiveness however is expected and required!”*

*Continued use of the unenclosed cotton bag style filters inside the work areas still of concern as these frequently do not adequately control fine dusts from the processes. Use of any recirculation filters requires proof that it is effective (and checked regularly by the client and at TExT by the Examiner).*

* **Fans in Reverse?** *Still too many fans being discovered in this condition and concerned that not all TExT Examiners were physically checking for correct direction of rotation for every fan at every TExT.*
* **Spray booths, Pleated Filters etc? HSE’s view on minimums etc?**
	+ For concertina filters at the back of booths the best angle for the pleats is just under 900
	+ Do face velocities at booth entry face and at back wall (pleated filters)
	+ For the pleated face may well have to use a device such as a Top Hat to be able to take meaningful readings
	+ Undertake smoke tests to establish/check Clearance Times
* **Views on Stack Discharge Arrangements?** “*HSE view is that the Environment Agency guidance note D1 was the preferred way to go. They did accept that 3m above highest point was still a good generic standard to follow.”*
* **If a system was found to have a faulty alarm/indicator …. and if all other tests/observations were OK (including qualitative tests) – would HSE expect that system to be classed as “unsatisfactory”.** “*Normally “Yes” as the TExT is only on one day and there are another 354 days in the year where it is monitoring/required. But the final decision would depend on the process, risk, substance*”.
* **HSE’s view on a multi-hood system where only one hood was “Unsatisfactory” and other were OK? How to report in a TExT?** “*Impression was that HSE would look to possibly using the* ***Amber*** *satisfactory marking – or possibly even to spilt the Satisfactory/Unsatisfactory box into 2 with an Unsatisfactory Hood “X”? Accepted not normally necessary to fail the whole system but added the usual caveat of – it would depend on the substance, the risk and the process!*”.
* **Manuals & Log Books** - HSE expects to see them available for each LEV system! Was not necessary for them to be on/by the actual LEV but they should be “*readily accessible*”
* **Repeat TExT Failures**? – HSE still seeing repeat failures on same system year after year. TExT Examiner **should** state in report something along the lines of - “***this fault was present at previous TExT and no action has apparently been taken to rectify***”
* **LEV performing adequately but significant issues eg hole in duct, rattling fan, torn hood?**  HSE’s view is that this system would  *“(normally) be classed as “Unsatisfactory” until such issues rectified”*.
* **Benchmarking test figures** – always ensure that your test results are appropriately benchmarked eg against commissioning data, HSG258 guidelines, ACGIH Manual etc
* **CoSHH Compliance?** – Do always make sure you testing regime and Reports comply with CoSHH ACoP paras 186 and 189 – HSE will almost certainly benchmark your performance against these requirements.
* **Qualitative Testing?** – Always consider the appropriate qualitative test – eg smoke release/dust lamp. Difficult to see how TExT examiner could be assessed as having undertaken a competent TExT (where they say system is “Satisfactory”) without a qualitative test?