

Asbestos stripping

Development of guidance and approved codes of practice

Pragma+Associates

Health & safety expertise you can trust

Overview

- HMFI letters: 1945, 1949, 1954
- HMFI report for 1945, 1956
- ARC COPs:
 - Dec 1966, Mar 1970, Mar 1973, Aug 1977
- HSW 44
 - Dec 1970, 1974/75, 1977
- HSE ACOPs and Guidance:
 - Oct 1981, Aug 1983, Feb 1985, Mar 1988, Feb 1993, Feb 1999, Dec 2002, Nov 2006, Apr 2012

HMFI

- 1945 letter: Shipbuilding/repair, wide distribution and 1945 report
 - Respirator for dry removal, clear up ASAP
- 1949 letter: addressed to power station, further ref to 1945 letter:
 - 'all possible steps', exhaust ventilation, respirators, damp to clean up
- 1954 letter: Brief advice to power station
 - Exhaust draught or respirator
- 1956 HMFI report:
 - 'very hazardous process', silent on precautions

ARC COPs

- 1966: Segregate, industrial vacuums, wet lagging, RPE
- March 1970: (no copy available)
- March 1973:
 - Determine type before work starts (colour or sample), notify crocidolite work
 - Pre-wet/soak or spray; cut and bag (don't allow to fall), extraction
 - vacuum overalls and other arrangements, daily cleaning (separate ARC COP)
 - Positive pressure or airline RPE for any dry stripping or crocidolite
 - If screens/tents reduce dust to acceptable level: 'normal processes' proceed
- August 1977:
 - 'Rope off' before removal, screening if required

HSW 44

- Dec 1970
 - Plastic sheeting for floor/plant covering and tenting
 - Portable LEV
 - Industrial vacuum/high efficiency filter (as advertised); 'scrupulous cleanliness'
 - RPE in enclosure
 - Other precautions essentially as per ARC
 - Accepts some work will need to be done dry: 'highest standards of PPE'
 - PPE for 'others in vicinity exposed to dust'
- 1974 or 1975 (date unclear) and 1977
 - Specific reference to difficulties of wet stripping on ships removed
 - Changes to paragraphs regarding cleaning

1981 HSC ACOP and GN

“Work with asbestos insulation and asbestos coating”

- Published in draft in August 1979
- Cross-references to AR 69 and HASAWA
- Much more detailed. Explicit requirements and advice, including re:
 - information, instruction and training
 - ALARP outside working area
 - Hygiene facilities, cleaning of PPE/RPE
 - Travel between work area and changing (change overalls)
 - End of work (visual inspection, sample to show < EH10 ‘where necessary’)
 - Sealing of lagging, choice to seal or remove and precautions
 - Record keeping
- Dry stripping remains an option (high standard of RPE and separation)
- *“Working area should be enclosed”* **but** if not RP, rope or barrier

1983 and 1985 HSC ACOP and GN

“Work with asbestos insulation and asbestos coating”

- 1983 changes refer to revised versions of EH10 only
 - EH 10 April 1983 (change from ‘standards’ to ‘control limits’)
- 1985 explicitly states only change relates to new EH 10
 - EH 10 July 1984 (came into force August 1984)
- Neither 1983, nor 1985 refers to clearance level of 0.01 fibres/ml first referred to in July 1984 EH 10

1988 HSC ACOP: *“Work with asbestos insulation, asbestos coating and asbestos insulating board”*

- ‘Major work’ with AIB included, major work if:
 - An action level or control limit is liable to be exceeded, or
 - > 1 hour or 2 m² and break/cut/machine/abrasion or suspended ceiling work
- ‘Guidance Note’ dropped from title
- In force 1 March 1988, as per CAWR 1987, revised format to ACOP
- Structure as per CAWR, starting with ‘Assessment’
- ‘The work area should normally be completely enclosed’ (para 7),but
- ‘In rare cases enclosure may not be reasonably practicable’ (para 9)
- ‘Dry methods’ remain acceptable
- ‘Site clearance’ includes ref to 0.01 f/ml and visual inspection

1993 HSC ACOP: *“Work with asbestos insulation, asbestos coating and asbestos insulating board”*

- Change of format (cites Regulation, then gives ACOP)
- ‘Enclosure may not be reasonably practicable’ advice is under a new sub-heading ‘open sites’.
- More detailed comment on dry stripping:
 - Exposure may exceed RPE protection factors
 - Dry stripping should not be used unless there are strong reasons (eg hot work, electrical risks) that prevent ‘less dusty methods’
- Increased emphasis on visual inspection after work (para 48)

1999 HSC ACOP: *“Work with asbestos insulation, asbestos coating and asbestos insulating board”*

- New section focussing on action levels and control limits (actions levels introduced by CAWR in 1988)
- Reformatted
- Revised advice on enclosures, use when ‘reasonably practicable’, advice on open sites remains as per previous version.
- Reference to GN EH 51 1989 *“Enclosures provided for work with asbestos insulation, coatings and insulation board”*
- *“Employers should not use uncontrolled dry stripping unless there is no reasonably practicable alternative”* (para 39)
- Reference to HSG189/1 1999: *“Controlled asbestos stripping techniques for work requiring a licence”*

2002 HSE ACOP: *“Work with asbestos insulation, asbestos coating and asbestos insulating board”*

- CAWR 2002
- Introduced ‘Duty to manage’ for ‘duty holders’ in relation to non-domestic premises
- Choice of work method ‘to minimise dust at source’, ‘normally means controlled wet stripping avoiding use of power tools’
- ‘Employers must not use dry stripping unless there is no RP alternative’
- Advice re ‘open sites’ and enclosures as previous version but with qualification (para 131) to the effect of ‘enclosures required inside’

2006 HSC ACOP and Guidance:

“Work with materials containing asbestos”

- Introduction of CAR 2006
- Combined ASLIC, CAWR and prohibition Regulations
- Stripping work covered by the Licensed Contractors Guide HSG247
- HSG247: new, extensively revised and augmented guidance
- HSG247 re dry stripping:

“Except under exceptional circumstances dry work, hot work and work using power tools is not acceptable and must not be carried out”

2013 HSE ACOP and Guidance: *“Managing and working with asbestos”*

- CAWR 2012
- HSG247 Licensed Contractors Guide 2006 remains most relevant for stripping work (and is still current at Feb 2022).