

Asbestos stripping

The use of specialists in asbestos removal

Pragma+Associates

Health & safety expertise you can trust

Origins in literature

- 1972 HMFI annual report (published Sept 1973)
 - *“Efforts have also been made to encourage the removal of all asbestos by specialist sub-contractors before demolition starts...”*
- 1973 HMFI annual report (published Sept 1974)
 - Refers to the asbestos subcommittee of the joint advisory committee on safety and health in the construction industry report below...
- 1974 ‘Precautions in the use of Asbestos in the Construction Industry’
 - *“It was accepted that the only safe way of conducting demolition of such plant is for lagging to be removed by properly equipped specialist contractors before demolition is allowed to start.”*
- 1974 HSW 44 (third impression with amendments)
 - *“...industrial premises should be de-lagged preferably by specialist contractors before demolition begins...”*
 - No reference in 1970

'Specialists'

- Definition of a 'specialist':
 - a person who concentrates primarily on a particular subject or activity; a person highly skilled in a specific and restricted field.
- In the 1970s likely to be...
 - Existing insulation contractors, such as Cape Contracts, Newalls Insulation, William Kenyon, Kitsons, etc
 - Heating & Ventilating Contractors Association (HVCA) members
 - Thermal Insulation Contractors Association (TICA) members
- 1978 ACA report – outlines the 'structure of the industry'
- Specific trade associations came later
 - Asbestos Removal Contractors Association (ARCA) (founded 1980)
 - Asbestos Control and Abatement Division (ACAD) (founded 1993)

Development of techniques

- ARC COPs
 - 1966 – Segregate, industrial vacuums, wetting, RPE
 - 1970s – Greater emphasis on wetting & cleaning surrounding areas
 - ‘puncture surfaces to allow water to be introduced into the insulation’
- HSW 44
 - Makes reference to various techniques, including ‘wetting equipment’
“...a manifold with a number of hoses terminating in injection heads which are inserted in the lagging, and water from perforations in the heads seeps into the asbestos.”

Development of techniques

- 1981 HSC ACOP and Guidance Note
“Work with asbestos insulation and asbestos coating”
- Much more detailed and explicit
 - Wet stripping - aim to ‘thoroughly saturate before removal’
 - Dry stripping – reliance on RPE and separation
 - Air extraction
 - Enclosures
 - RPE/PPE - including selection, use and cleaning
 - Hygiene facilities - including type, location, transit, maintenance and cleaning
 - Visual inspection after cleaning and prior to ‘normal occupation’
 - Air monitoring ‘where necessary’
 - Information, instruction, training and supervision

Asbestos (Licensing) Regulations 1983

- Came into force 1 August 1984
- Prohibited work with asbestos insulation/coating unless employer held a licence issued by HSE
- Certain exemptions
- Licences issued for a set period
- Licences could be issued with a number of conditions
- Issued to employer's who could prove a certain 'level of knowledge'
- Did the regulations improve standards?

Enforcement

1993 HSE OC 265/44

- Refers to a letter sent to all Licensed Asbestos Removal Contractors (LARCs) in July 1992

“This letter advised contractors that their industry had not been placing sufficient emphasis on the requirement of Control of Asbestos at Work Regulations 1987, reg. 8, (CAW Regs) that exposure to asbestos dust should be prevented or reduced to the lowest level reasonably practicable. The letter gave prior notice to the industry that amendments to the CAW Regs and to the asbestos removal ACOP, which would come into effect on 1 January 1993, would place much more emphasis on dust suppression or control during such work.”

Levels of cleanliness

- How clean is clean?
 - 1981/83 ACOP
 - 'Inspect after cleaning to ensure debris removed'
 - Air monitoring 'where necessary'
 - 1984 EH10
 - 'Area should be thoroughly cleaned' (wire brush, vacuum, damp cloths)
 - Allow to dry before 'final inspection and air monitoring'
 - Reference to 0.01 fibres/ml, and to clearance monitoring/sampling
 - 1985 ACOP
 - Monitoring at the end of work to assess suitability for 'normal occupation', in accordance with 'established methods'
 - 1988 EH10 & 'Work with...' ACOP
 - reference to 'thorough visual inspection' and 'clearance monitoring'

Role of the Analyst

- 1993 'Work with...' ACOP – 2nd edition

- Under 'site clearance'

"...employer of those who have carried out the work should ensure that the area is thoroughly cleaned..."

"...thorough visual inspection..."

"There will be increased confidence for all concerned if inspection to confirm whether or not the area is clear is done through the employer's own quality assurance system, or by an organisation independent of the employer."

- 2001 EH10
- 2002 'Work with...' ACOP – 4th edition
- 2006 HSG248 Analysts' guide for sampling, analysis and clearance procedures

Final thought...

Licensed Asbestos removal company fined, and company director jailed, for failing to protect workers:

https://press.hse.gov.uk/2022/02/21/asbestos-removal-company-fined-for-failing-to-protect-workers/?utm_source=govdelivery&utm_medium=email&utm_campaign=press-channels-push&utm_term=asbestos-button&utm_content=news-1-mar-22