

Recommended Guidelines for
Working with Asbestos-Containing
Textured Decorative Coatings

No.17

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A large, light blue, curved graphic element on the left side of the page, resembling a stylized 'C' or a partial circle. It contains the text "asbestos removal contractors association" in a small, white, sans-serif font, following the curve of the graphic.

asbestos removal contractors association

1. OBJECTIVE

Results of research undertaken by the Health and Safety Laboratory (HSL) showed that the asbestos fibre release during asbestos textured decorative coating (TDC) removal was much lower than previously thought. Therefore, the Control of Asbestos Regulations 2006 (CAR 2006) no longer requires TDC removal work to be carried out solely by contractors licensed by the Health and Safety Executive (HSE), unless the Control Limit or the Short Term Exposure Limit (STEL) is likely to be exceeded.

As a result of the changes in legislation this guidance note has been prepared to provide best practice advice to anyone planning, organising or intending to carry out removal of TDC. The HSE publication "Asbestos Essentials Task Manual" should be referred to for minor works on TDC. Asbestos Essentials Task Sheets can be downloaded from:

www.hse.gov.uk/asbestos/essentials/index.htm

2. WHAT ARE ASBESTOS TEXTURED DECORATIVE COATINGS?

The Approved Code of Practice (ACoP) which accompanies CAR 2006 states "textured decorative coatings which contain asbestos mean thin decorative and textured finishes such as paints and sealing plasters used to provide a visual effect. These coatings are designed to be decorative and any thermal or acoustic properties are incidental to their purpose. The proportion of asbestos in such coatings is normally between 2 and 5% chrysotile."

3. CURRENT LEGAL POSITION

CAR 2006 significantly changed the asbestos licensing requirements regarding TDC. The ACoP which accompanies CAR 2006 states "work with TDC would not normally need to be carried out by a person licensed to work with asbestos as work with this material will usually fulfil the condition for Regulation 3(2)" i.e.

- The work will not exceed the Control Limit, which is now 0.1 fibres / cm³ when measured over 4 hours
- The work will not exceed the STEL which is 0.6 fibres / cm³ when measured over any 10 minute period.
- The work involves materials in which the asbestos fibres are firmly linked into a matrix, which includes TDC.

All work with TDC must be carried out by competent persons in accordance with CAR 2006. This includes:

- A suitable and sufficient risk assessment. All work on TDC must be undertaken by trained workers in accordance with a plan of work aimed at controlling exposure to asbestos dust as far as reasonably practicable by appropriate methods of work
- Correctly serviced and maintained class H vacuum cleaner
- Provision of adequate Personal Protective Equipment (PPE)
- Provision of suitable Respiratory Protective Equipment (RPE) for which face fit testing has been carried out for each user
- Adequate control measures to prevent the spread of asbestos
- A work method which demonstrates exposure is to be kept as low as reasonably practicable and that Control Limit or STEL will not be exceeded
- Adequate procedures to ensure visual cleanliness on completion of the work
- Provision for waste carriage and disposal in accordance with the Hazardous Waste Regulations 2005, refer to ARCA Guidance Note No. 2.

Work with TDC may also fall within the scope of the Control of Substances Hazardous to Health Regulations 2002, and the Construction (Design and Management) Regulations 2007 (CDM 2007), as there is a need to control general dust, for example during the removal of lath and plaster ceilings. Welfare facilities including showers should be provided if the nature of the work is particularly dirty or dusty.

4. HSE GUIDANCE ON WORKING WITH ASBESTOS TEXTURED DECORATIVE COATINGS

The ACoP which accompanies CAR 2006 states the measures that should be employed to help contain and prevent the spread of asbestos fibres and other materials during all but the most minor work with TDC. The following is a summary of those measures.

- Suitable Respiratory Protective Equipment (RPE) should always be worn such as oronasal respirators with P3 filters.
- Suitable Personal Protective Equipment (PPE) should be worn
- Where work is being carried out in areas where water, fire or other damage has occurred pre cleaning of the area may be necessary
- The work area should be segregated using the existing room or a purpose built enclosure
- Access to the enclosure should be regulated through a two stage airlock
- The inappropriate use of power tools or the use of dry abrasive processes should be avoided
- Workers should decontaminate in the airlock using a class H vacuum cleaner
- RPE and PPE should be removed in the outer stage of the airlock
- The area should be thoroughly cleaned and a visual inspection carried out before it is returned to the occupier
- Clearance air monitoring is not necessary
- Whilst an independently provided certificate of reoccupation is not necessary, a statement signed by the person completing the visual inspection should be provided
- TDC removal would only require notification to the enforcing authority 14 days in advance if the Control Limit of 0.1 f/cm^3 (or the STEL of 0.6 f/cm^3 over 10 minutes) is likely to be exceeded.

5. ARCA RECOMMENDED BEST PRACTICE

If you employ anyone to carry out this type of work you should ensure they are adequately insured in accordance with section 8 of this document.

It is ARCA's opinion that the revised minimum control measures are not sufficient to provide adequate reassurance to those intending to reoccupy the premises following TDC removal work. ARCA therefore suggest that the following best practice advice is adopted by both clients and contractors when planning or undertaking this type of work.

- Provision of a decontamination unit to ensure that operatives adequately decontaminate themselves. Under Regulations 9, 13 and 22 of CDM 2007 duties are placed on the client, contractor, and principal contractor to ensure that welfare facilities are provided in accordance with schedule 2 of the Regulations. In essence Schedule 2 states that there has to be suitable and sufficient washing facilities, including showers if required by the nature of the work. In terms of welfare facilities, what is required will depend upon the work being undertaken. The HSE have said that shower facilities are likely to be appropriate for TDC removal. This is in line with what would be expected for any other similarly "dirty" construction work.
- A 3 stage airlock should be provided
- Work methods should be chosen to minimise the amount of dust created

- Due to difficulty in carrying out adequate dust suppression during removal of TDC, it is recommended that full polythene enclosures are provided under negative pressure in order to prevent the spread of dust.

6. REMOVAL OF ASBESTOS CONTAINING TEXTURED DECORATIVE COATINGS

The main methods of removal include

- Textured coatings on board – the most effective method is to remove the board complete.
- Removal of asbestos containing textured coating on concrete, brick, or block. Use of abrasive methods should be used with caution and only after adequate risk assessments have been carried out.
- Steaming methods are not recommended as this can lead to operatives suffering heat stress within the confines of an asbestos enclosure.
- Chemical treatments – very effective non toxic products are available and it is recommended that these are used.

7. VISUAL CLEANLINESS

The person planning the job should consider how reassurance can be given that the job has been completed to a satisfactory standard. In all cases a thorough visual inspection should be carried out to ensure that the work area has been thoroughly cleaned and that no visible traces of dust and debris remain.

Where work is carried out in areas which are to be reoccupied, air testing should be considered. This may take the form of a 4 stage clearance or reassurance air test performed by an organisation accredited to ISO 17025 by UKAS.

8. INSURANCE

Clients should ensure that contractors engaged in this type of work have the appropriate insurance cover relating to asbestos. All licensed contractors will have Public Liability Insurance which provides specific cover for the removal of asbestos containing materials. The client should make the appropriate checks in order to ensure that they are adequately protected from any future claims arising out of the work. These claims could either be for asbestos related health problems or for contaminated property.

9. WASTE DISPOSAL

The waste generated from this type of work may be classified as hazardous waste under the Hazardous Waste Regulations 2005 in England and Wales or Special Waste under the Special Waste Regulations 1996 which are in force in Scotland. For further information see ARCA Guidance Note No. 2.

10. REFERENCES

The Control of Asbestos Regulations 2006
The Control of Asbestos Regulations 2006 Approved Code of Practice L143
The Hazardous Waste Regulations 2005
The Special Waste Regulations 1996
The Control of Substances Hazardous to Health Regulations 2002
The Construction (Design and Management) Regulations 2007
Asbestos Essentials Task Manual HSG 210