

Work with Asbestos Paper

Appendices are attached to Technical Working Group minutes when the nature and extent of discussions (or the complexity of the subject) warrants further explanation and clarification. The following is a summary of the discussions and conclusions on the above topic.

This document provides guidance on the classification status of work with asbestos paper. Most work on asbestos paper products is likely to be “non-licensed” i.e. non-notifiable non-licensed. However, irrespective of the status of the work, the main emphasis should always be on ensuring adequate control through the risk assessment and plan of work (POW).

Summary and Explanation:

Licensed or Non-Licensed Work:

Asbestos paper, when applied as a thin sheet(s) (<1mm) to pipework, vinyl floor tiles or boards etc, was primarily intended as a vapour barrier rather than for thermal/acoustic insulation purposes. Therefore this type of asbestos paper would not be considered a licensable material as defined under Control of Asbestos Regulations (CAR) 2012 Regulation 8. In addition, as asbestos paper will generally break into fragments and pieces (ie not fine particles of dust), exposure and fibre levels associated with controlled work on these forms would not be expected to exceed the Control Limit or the STEL.

However there are some exceptions to this. Corrugated paper and woven textile material have been used for duct and pipe insulation. This material is thicker (>1mm) than typical sheeted asbestos paper and work on these materials can give rise to airborne levels in excess of the limits. Where the material is employed as insulation (eg pipe insulation), it meets the definition of a licensable product. Therefore removal work is likely to be licensable.

Non-Licensed or Notifiable Non-Licensed Work (NNLW):

Most work on asbestos paper is likely to be part of a “maintenance” activity (eg repair, up-keep, redecoration, refurbishment etc) and therefore the criteria exempting work from notification set out in Regulation 3(2) of CAR 2012 will apply (i.e. it is a short non-continuous maintenance activity on a non-friable material).

“Maintenance” work therefore will primarily be non-licensed. The condition of the material at the outset of the work or the method of removal is not considered as part of the maintenance work criteria and therefore is not taken into account.

Where work is concluded not to be maintenance then by default it is “removal” under CAR 2012 Regulation 3(2). In these circumstances where the asbestos paper is in good condition at the outset and can be removed (mostly) whole, without excessive scraping, damage and disturbance, then the work will also be “non-licensed” as the removal can take place without significant “deterioration/degradation”. In these situations a pragmatic approach should be applied. Where the majority of the paper covering is easy to remove, the presence of a small section where the paper requires scraping does not mean that it becomes NNLW.

Where the asbestos paper is initially in poor condition or has to be mostly scraped off, then the work will be “notifiable non-licensed” (NNLW).

Monitoring:

A personal monitoring/sampling regime should be in place to support the assessments and judgements being made and to inform future assessments and decision making.

The classification of asbestos paper removal is summarised in the Table below:

	Type of work	Quantity/Scale/Condition	Classification
Thin asbestos paper sheets <1mm (for example, on board or pipework)	Maintenance work	Any scale (except large scale refurbishment) Any condition	Non-licensed
	Work is classed as "Removal" i.e. not maintenance e.g. large scale refurbishment	Good condition and removed largely intact etc.	Non-licensed
Thicker asbestos paper >1mm as corrugated board, woven material used for insulation purposes	"Removal" ie not maintenance eg large scale refurbishment	Poor condition or difficult to remove eg large areas stuck to pipework etc.	NNLW
	Any work except "Short Duration"	All work except short duration Condition not relevant	Licensed
	"Short Duration" work	Work meets the short duration criteria set out in CAR2012 Regulation 2(3). Classed as "maintenance*" Estimate of exposure levels: Unlikely to exceed the Control Limit or STEL.	Non-licensed

* Note: Work classed as "removal" (ie larger scale) would not meet the short duration exemption and therefore would be licensable.