

Recommended guidelines for working textured decorative coatings containing asbestos

Objective

1) This note replaces ARCA Guidance Note 17 (published in August 2007). The previous information has been reviewed and revised in light of the Control of Asbestos Regulations 2012 (CAR) and accompanying Approved Code of Practice (ACOP) and guidance.

Textured decorative coatings

2) Regulation 2 of CAR defines textured decorative coatings as "decorative and textured finishes, such as paints and ceiling and wall plasters which are used to produce visual effects and which contain asbestos. These coatings are designed to be decorative and any thermal or acoustic properties are incidental to their purpose". The proportion of asbestos typically found in such coatings is between 2 and 5% (chrysotile, by weight).

Categories of work: licensed, notifiable non-licensed work (NNLW) and non-licensed work

3) Regardless of category, the main provisions of CAR will apply to any work on textured decorative coatings (TDC). In particular,

- a) all work must be thoroughly assessed;
- b) a plan must be in place to prevent (or reduce) exposure and spread and
- c) work must only be carried out by trained and competent staff, using appropriate control measures.

) Appropriately controlled work with textured decorative coating will not be licensable work: exposure will be less than 'sporadic and low intensity', the control limit will not be exceeded and the other specified categories of work do not apply.

5) The following conditions determine whether work on textured coatings will be NNLW or non-licensed. If any of the following conditions apply, then the work is non-licensed:

- a) Work is short, non-continuous maintenance activity
- b) Removal work can be carried out without deterioration of non-degraded materials where asbestos fibres are firmly linked in the matrix
- c) Work involves the encapsulation/sealing of coatings in good condition
- d) Work is limited to air monitoring, sampling etc.

6) Guidance at paragraph 59 of the ACOP give practical examples of the kind of work that is non-licensed. These are supported by Asbestos Essentials task sheets (a26-a29, see link below).

a) Removal of small areas of TDC using gel/ steam, in support of other maintenance activities. For example, when installing fire alarms or light fittings, or the removal of similarly small areas in the event of water damage.

Recommended guidelines for working textured decorative coatings containing asbestos

b) Removal of TDC without deterioration, for example, removing backing boards to achieve virtually intact removal.

c) Drilling through decorative coating in order to install fixtures and fittings.

7) Any larger scale activities will be considered NNLW and regulations 9 (notifications), 18 (designated areas) and 22 (medical surveillance) will apply:

a) A notification (through HSE's web portal) is required prior to starting work.

b) Designated areas need to be defined prior to work, with access restricted to competent staff and workers need to be under medical surveillance.

c) Employees carrying out NNLW must have a medical examination on, or before 30 April 2015: "From 1 May 2015, anyone carrying out NNLW should have been medically examined under the Regulations in the past three years. Medicals for such employees need to be repeated every three years.

General requirements for any work with TDC

A suitable and sufficient risk assessment of the particular circumstances, used to formulate a plan of work that will control exposure / spread (and non-asbestos risks) as far as reasonably practicable.

Trained workers, working in accordance with the plan of work.

Correctly serviced and maintained class H vacuum cleaner.

Provision of adequate Personal Protective Equipment (PPE). Unlike licensed asbestos work, coveralls may be worn over clothing, but see the note below on welfare arrangements.

Provision of suitable Respiratory Protective Equipment (RPE), such as on-nasal mask with P3 filter. Face fit testing must confirm a good fit for each user.

Adequate procedures to ensure visual cleanliness on completion of the work.

Provision for waste carriage and disposal.

Suitable insurance: clients should ensure that contractors engaged in TDC work have the appropriate insurance cover relating to asbestos.

There is a need to control general dust, for example during the removal of lath and plaster ceilings. Welfare facilities including showers will be required where the work is particularly dirty or dusty: Control of Substances Hazardous to Health Regulations 2002, and the Construction (Design and Management) Regulations 2015 (CDM 2015) are likely to apply.

Standards of control –further detail

8) Controls for 'small scale works' are described in Asbestos Essentials. Where more substantial work is undertaken, the following standards should be achieved.

Recommended guidelines for working textured decorative coatings containing asbestos

a) Enclosure

- i) A full enclosure is required, with negative pressure units capable of providing an airflow of at least 500m³/hour, see paragraph 386 of the ACOP.
- ii) Access to the enclosure should be via a 2-stage airlock, to allow for the controlled removal of work equipment, minimising the spread of dust and debris from the working area. In the inner stage, workers should vacuum (using a H-Class vacuum cleaner), wash footwear and wipe RPE. PPE and RPE should be removed in the outer stage.

b) TDC Removal methods

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

9) Welfare arrangements

a) Duties are placed on the client, contractor, and principal contractor to ensure that welfare facilities are provided. The Construction (Design and Management) Regulations 2015 require suitable and sufficient washing facilities, including showers if required by the nature of the work. Shower facilities are likely to be appropriate for anything other than minor TDC removal. This is in line with what would be expected for any other similarly "dirty" construction work.

10) Cleanliness and reoccupation

a) 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. HSE's Asbestos Essentials sheet EM10, provides a template 'Statement of cleanliness after textured coating removal'

11) Waste disposal. All waste should be:

- a) double-bagged or double-wrapped in plastic sheeting with the correct hazard warning signs attached
- b) carried in a sealed skip (or in a vehicle with a segregated compartment for the asbestos, easily cleanable and lockable) or transported by a registered waste carrier
- c) disposed of at a licensed disposal site
- d) accompanied by a completed Waste Consignment Note.

Recommended guidelines for working textured decorative coatings containing asbestos

References

- HSE L143 Managing and working with asbestos: Control of Asbestos Regulations 2012 Approved Code of Practice and Guidance
- HSE Asbestos Essentials
- HSE guidance on Notifiable Non-Licensed Work
- HSE L144 Managing Health and Safety in Construction: Construction (Design and Management) Regulations 2015.