

Position paper - removal of asbestos waste from sites

This position paper relates to an emerging trend within the asbestos removal and demolition industry. At the completion of asbestos removal, asbestos containing material (ACM) is being poorly wrapped and remaining on site in a plastic “parcel”, often at the rear of the property until the end of the demolition process.

This is in breach of the Work Health and Safety Regulation, 2017 (clause 472) which requires asbestos waste to be removed from site as soon as practicable (possible). Note, this guidance relates to all asbestos waste generated by asbestos removal processes, not just parcels of asbestos.



Photo1: Example of an asbestos waste “parcel” not suitably sealed, contained or secured in a manner that facilitates its future safe disposal

Background

Inspectors have observed such parcels are often inadequately sealed for mechanical lifting, and not labelled as being ACM, including instances where a clearance certificate has been issued but an asbestos “parcel” remains on site.

Why this is important

ACM being left onsite creates a risk of:

- Parcels being disturbed when being lifted (e.g. plastic ripping or parcel opening up),
- Parcels being disturbed during demolition processes (e.g. impact damage).

The above can cause asbestos debris to be left on site in the locations where the parcel was stored / moved.

Additionally, it also creates a risk of:

- ACM parcels being disposed of as a non-asbestos waste,
- Persons being inadvertently exposed to asbestos waste ejected from the parcels.

Legislation

The Work Health and Safety Regulation 2017 places several obligations on asbestos removalists in relation to disposing of asbestos waste.

Clause 472 - Disposing of asbestos waste and contaminated personal protective equipment, states “an asbestos removalist must ensure that asbestos waste;

(a) is contained and labelled in accordance with the GHS (Globally Harmonised System) before the waste is removed from an asbestos removal area and,

(b) is disposed of as soon as practicable at a site authorised to accept asbestos waste.”

Clause 473 – Clearance Inspection states “a clearance inspection is an inspection of an asbestos removal area after asbestos removal work has been completed to verify that the area is safe for normal use,”

The Work Health and Safety Regulation 2017 also places obligations on the licensed asbestos assessor or competent person who carried out the clearance inspection.

Clause 474 Clearance Certificates states: “The clearance certificate must be in writing and must state that the assessor or competent person found no visible asbestos residue from asbestos removal work in the area, or in the vicinity of the area, where the work was carried out”.

What to do as a removalist

You must plan ahead for the prompt disposal of asbestos waste generated as part of your asbestos removal job. A licensed asbestos waste facility should be identified prior to the asbestos removal occurring, ensuring the asbestos waste can be taken there and disposed of immediately after the removal takes place and before the clearance inspection occurs.

Consider the site and job features:

- Where is the source of the asbestos waste?
- How will you get it off site during removal?
- Can you minimise distances for manual handling?
- You may have to remove the sealed waste in smaller packages directly to a vehicle tray or skip.

Consider waste disposal when requesting a clearance inspection. The competent person or licensed asbestos assessor should not be asked to undertake a clearance inspection if

asbestos waste remains on site. Asbestos that cannot be removed due to its location until further demolition takes place i.e. packers between timbers on pier caps etc is not yet waste. In this case, a second clearance inspection will be necessary if the remaining asbestos is greater than 10m² or is friable asbestos.

You should include details of how the asbestos will be prepared (double bagged or double wrapped and labelled) and disposed of in your asbestos removal control plan.

All asbestos waste must be suitably double bagged or securely double wrapped in minimum 200µm plastic sheeting AND labelled in accordance with the GHS as asbestos waste. This means that the labelling needs to feature the word “Danger” AND the phrase “May cause cancer if inhaled” AND must also display the graphic below: as per Clause 472 (a)



Figure 1 Example of an asbestos waste label

Labelling needs to be clearly visible: this means applying multiple labels to the waste or using pre-labelled packaging.

Waste Temporarily Stored on Site

Where exceptional circumstances exist and asbestos waste cannot be taken off site and disposed of at the time of removal, then it must be suitably sealed, contained and secured in a manner that facilitates its future safe disposal. This means where the contents cannot be disturbed, and the waste container can be readily relocated for transport. E.g. the waste is contained within an enclosed skip or other container designed for the containment of asbestos waste.

Where asbestos waste is not promptly removed from site it must be secured. E.g. padlocked skip or fencing around the waste. The skip or fence must feature asbestos warning signage “Danger Asbestos” on the outside. This is in addition to labelling of the actual waste.

The clearance certificate must state that asbestos waste is remaining on site and is suitably sealed and secured.

In the above circumstances, a second clearance inspection and certificate will be required in these circumstances, to verify the waste has been removed from site and disposed of as asbestos waste.

Clearance inspection

The competent person or licensed asbestos assessor must inspect areas in the vicinity of the asbestos removal as part of their clearance inspection and confirm the absence of visible asbestos or asbestos-containing material. This includes the transit, waste routes and the immediate surrounds of the asbestos removal area.

Clearance certificate

The licensed asbestos assessor or competent person must ensure that the asbestos removal area does not pose a risk to health and safety from exposure to asbestos.

The licensed asbestos assessor or competent person must not issue a clearance certificate if the asbestos waste is not suitably sealed, contained and secured in a manner that facilitates its future safe disposal.

The clearance certificate must state that the assessor or competent person found no visible asbestos residue from asbestos removal work in the area, or in the vicinity of the area, where the work was carried out. This must be done only after the asbestos waste material is removed from site.



Photo 2: Example of asbestos waste “parcel” not suitably sealed, contained and secured in a manner that facilitates its future safe disposal



Photo 3: Example of asbestos waste “parcel” not suitably sealed, contained and secured in a manner that facilitates its future safe disposal, with apparent additional unwrapped asbestos-containing material added.

For more information, please call SafeWork NSW on 13 10 50.