Asbestos Network

Appendix 02/24
Minutes of the 44th meeting of the Asbestos Network Technical Working Group (ANTWG), 21st August 2024
Composition of TWG = ACAD, ARCA, ASESA, BOHS-FAAM, HSE, IATP, Independent Industry Representative, NORAC and UKATA

Asbestos Skips, Van Waste Compartments, Waste Storage and Movement on Site

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 and should be read in conjunction with HSG247 and L143.

Purpose
Concerns have been raised through industry stakeholders, HSE licence renewal and HSE site inspections and industry audits. This document seeks to provide clarity of requirements to ensure skips and van waste compartments are fit for purpose. Clarification is also provided on temporary waste storage areas, movement of waste on site and temporary storage in vans.

Rear End Loaders
One skip design, known as a (closed) Rear End Loader, is causing particular concern. It is designed for use with rear-end loading vehicles, but waste can be placed at either end (as shown in photos below).

The following concerns were identified regarding safe loading of waste into this specific design:

- If waste is placed only at either or both ends it is likely that movement will occur during transport with potential loss of primary containment
- To fill the centre of the skip, waste bags need to be thrown
- The height of the openings introduces manual handling risks if heavy bags, or large, double wrapped items are handled

Other Issues with all types of Asbestos Skips

Waste skip checks have identified skips arriving on site from the supplier with:

- Holes and excessive rust
- Significant unknown dust build-up and debris
- Suspected clinical or food waste residues present
- Floor rollers with AIB residue

Minimum Design requirements for Asbestos Skips used for Licensed works

To ensure only skips that are fit for purpose are used for Licensed asbestos works, they should meet the following minimum requirements:

- Accessible to allow for:
    - Easy waste handling with minimal lifting
    - Careful waste placement to all areas of skip/waste compartment
    - Inspection and cleaning of all areas
- Sealed (to prevent loss of material) with a closely fastening door/lid that is not warped/damaged (plastic is more prone to warping)
- Easily lockable
- Resistance to water ingress
- Appropriate signage (see overleaf)

The above should be considered as minimum acceptance criteria for LARCs or duty holders accepting skips on to a licensed asbestos removal site. LARCs should have a policy that covers acceptance criteria that can be shared with the skip hire company. It should also detail action to be taken in the event of a skip arriving on site with suspected asbestos contamination. It is envisaged that the skip will be decontaminated in situ before use, for example using protocols detailed in the LARCs SOP. This should be recorded in the LARCs site diary, and the skip provider notified.

Asbestos Waste Compartments in Vans

Asbestos may be transported in an enclosed vehicle e.g. a van, as an alternative to a skip or container. The design requirements of an enclosed vehicle used to store and transport asbestos waste should be the same as those for a skip.

Issues identified via trade association audits of asbestos waste compartments within vehicles include:

- Storage of non-waste items alongside asbestos waste bags
- Reliance on van doors with no secondary door to internal waste compartment
- No signage on door to warn that asbestos waste is behind it

- Deteriorating seals and/or gaps that lead to inaccessible voids
- Trapping points for debris and dust e.g. crevices between the van door, flooring and storage areas
- Surfaces that are not readily cleanable

To ensure vans used for the transport of asbestos waste are fit for purpose, containers and compartments should meet the following requirements:

- Secondary door where the entire rear van compartment or part thereof is used.
- Accessible to allow for:
    - Easy waste handling with minimal lifting
    - Careful waste placement to ensure bags don't move
    - Inspection and cleaning of all areas
- Surfaces should be relatively smooth, free from holes, grooves etc. Where this is not possible, heavy-duty polythene or Correx® sheeting can be used, but must be inspected for rips, holes and these sealed or the sheeting replaced
- Free from hard edges e.g. over rear wheel hub which could tear bags
- Fully sealed (including joints) with a closely fastening door/lid that is not warped/damaged
- Easily lockable and where a wheelie bin is used secured in place to prevent movement in transit.
- Appropriate signage (see below)

The above should also apply when vans are used to "temporarily" transport waste from enclosure to skips over a significant distance on large demolition or industrial sites (common practice on refineries / power stations).

Annex 1 provides examples of acceptable design options. **Annex 2** provides examples of vans used to transport asbestos waste deemed unacceptable and how to fix them.

Minimum Signage Requirements

Suitable asbestos warning signs should be posted on the door of a skip, compartment or container within a van that alerts a person of the presence of asbestos waste bags so that they do not unknowingly open the door receptacle lid and 'eyeball' the waste. An example is shown below:

Note: There is no legal requirement to remove the signage whenever asbestos waste is not being carried, on the contrary the compartment may not have been cleaned so may still have asbestos present and removal of the sign increases the likelihood of it being mislaid and not being replaced.

Skips and vans will further be required to comply with Carriage of Dangerous Goods Regulations if the waste load carried exceeds the load limit exemption thresholds:

- All vehicles carrying packaged asbestos over the load limit exemption (333kg for amphibole waste (amosite and crocidolite) or 1000kg for serpentine waste (chrysotile) require marking with orange plates front and rear.
- Skips unless the load limit exemptions apply (very unusual for skips), must be marked as required by UN Class 9 hazard placards on all four sides, and the vehicle must also display plain orange plates front and rear.

Waste movement on site

Wheelie bins are often used to avoid the risk of spillage on longer waste routes and can also be used for waste storage within vehicles where adequate means of loading is available. To reduce the risk of dropping bags they should not be overfilled and be suitable for the terrain. In addition, they should have drop fronts (as shown below) to aid the manual loading of heavier waste bags and to facilitate inspection and cleaning.

Wheelie bins (including wheels and any trapping points) should be inspected for visible dust and debris, and cleaned if necessary. If used for storage of waste they should be suitably labelled and lockable.

Receptacles used to transport waste along designated waste routes should carry a suitable asbestos warning sign (see example earlier in document) to alert that it has or is intended to carry asbestos waste only.

Waste Storage on Site

Some sites do not have space for a dedicated skip and so an alternative waste storage solution is required. Any area used for waste storage should meet the following requirements:

- Sheeted out
- Sealed and signed door/access
- Secure (lockable)
- Included within daily checks to ensure condition/integrity
- Inspected as part of Stage 1 of 4SC procedure (waste route and surrounding area only)
- Visual inspection and reassurance air test following waste removal

Temporary Storage in Vans

Waste should be moved to a site with permission to accept it as soon as possible; however there are certain circumstances where this may not be the same day. Some common examples of this could be:

- the site was unexpectedly closed due to unforeseen circumstances when the carrier arrived.
- a carrier missed getting into a waste transfer station on a Friday and the site wasn't due to reopen until after the weekend.

In these circumstances, the respective environment agencies for England and Scotland (Natural Resources Wales have also been contacted) have advised that they would allow a registered waste carrier to leave waste in a secure van overnight or for a few days, if:

- this is incidental to the collection and transport of the waste from a work site; (i.e., not intended for waste 'carrier's rounds'); and
- the intention is not to use the van as a means of longer term storage; and
- provided the waste is secure (a locked vehicle would be deemed to be secure); and
- no treatment of the waste is carried out during this time.

They further advise that if the carrier transports a hazardous waste on a regular basis, it would be good practice to have a written procedure for such events.

References

Managing and working with asbestos. Control of Asbestos Regulations 2012. L143 Approved Code of Practice and guidance (hse.gov.uk)

Asbestos: The licensed contractors' guide - HSG247 (hse.gov.uk)

HSE - Asbestos: Asbestos essentials

Carriage of Dangerous Goods - What are the packaging and documentation requirements related to the carriage of asbestos and asbestos waste? (hse.gov.uk)

Annex 1 Asbestos waste carriage in vans – examples of acceptable design options

1. An 'off the shelf' waste box

2. Entire van compartment sealed and segregated from top to bottom, rounded wheel arch edges to minimise risk of bag puncture [Not shown but there should be a secondary door to protect the door furniture, rear electrical lights and prevent waste falling out on opening]

3. Side access compartment fitted with a secondary door which is signed and lockable

4. Purpose-built compartment/box inside van with door closed (right) and door open (left).

5. Wheelie bin signed and secured in side compartment of van

Annex 2 Asbestos waste carriage in vans - Examples of unacceptable designs and how to fix them.

Why? The compartment is not separated from adjacent compartment at bottom and tools can slide in and puncture waste bags. No secondary door access.

How to fix: Seal gap in compartment to fully segregate. Fit a secondary door.

Why? Open waste compartment in a shared storage area

How to fix: – fit a door to compartment with suitable warning signage

Why? Vulnerable to falling over during transit and wheelie bin lids not secure

How to fix: Secure lid (use a lockable design type) and wheelie bin (straps) and lock wheels (if an option)

Why? The entire van appears to be dedicated to waste but there are other non-waste items carried in the same space which could fall onto the waste bags and split them open. If not stacked correctly bags could fall out on opening, or on closing, be damaged by entrapment in van door.

How to fix: Fit a 'bulkhead' to extend up to the roof. Fit secondary door.

Why? The bags could fall out on opening or be entrapped by sliding door mechanism.

How to fix: Fit a secondary door to the compartment.

Why? Polythene sheeting used to segregate waste compartment at rear, but not sufficiently rigid to protect waste from other stored items.

How to fix: Install a fixed rigid compartment.