

Guidance on the management of bonded asbestos (cement) disposal

Objective

To provide ESA members with guidance to ensure that bonded asbestos (cement) waste received at site is transported and managed in compliance with health, safety and environmental legislation and best practice.

Introduction

Bonded asbestos (cement) is a hazardous material and must only be disposed of at facilities which are fully permitted to accept it. In addition to bonded asbestos (cement), asbestos waste can also include contaminated items such as building materials, tools and PPE.

Health Risks

Asbestos fibres can cause fatal lung diseases and cancers, and must therefore be handled, transported and disposed of properly.

Responsibilities:

Responsibilities relating to the disposal of bonded asbestos (cement) waste, falls to three main parties: the waste producer, the waste carrier and the disposal location. The key responsibilities are highlighted below.

Producer:

- In line with HSE Guidance note **em9: Disposal of Asbestos Waste**:
 - Present the waste correctly double bagged / wrapped in UN approved packaging and appropriately labelled
 - Use enclosed containers as the preferred containment method which remain closed except when depositing material - see Appendix 1
 - Use a licensed waste carrier
 - Correctly declare the category of the waste (Waste Duty of Care)

Carrier (transport):

- In line with HSE Guidance note **em9: Disposal of Asbestos Waste**:
 - Transport in enclosed containers as the preferred method - see Appendix 1
 - Container remains closed during collection
 - Waste Duty of Care paperwork is correctly completed and carried by the driver at all times
- In addition:
 - Provide additional PPE for drivers - disposable overalls, overshoes and gloves. FFP3 disposable dust masks which are correctly face fitted (see INDG479 for guidance)

Disposal:

- Permitted site
- PPE for drivers (as specified above) put on before tipping commences and disposed of with the waste material - other standard PPE, for example a hard hat or safety goggles will also be required
- Fully completed Waste Duty of Care paperwork (Hazardous Waste Consignment Note) with waste correctly categorised

- Visual inspection at the weighbridge to confirm correct presentation / containment for waste type where possible
- Visual check at point of disposal to confirm compliance (e.g bagging / wrapping, waste type). Non-compliance reported to the site manager.
- Asbestos waste is covered as soon as possible after tipping - all asbestos waste is covered before site closes.
- Written procedures in place for dealing with non-compliant loads e.g.:
 - rejecting load if identified prior to tipping; waste removed or covered as soon as possible; quarantine; informing the producer / carrier
- Means for damping available in the event of damaged sheets / split bags

Summary:

ESA members aim to deliver the highest standards in health and safety, environmental protection and regulatory compliance, including the handling and management of bonded (cement) asbestos.

With ESA member companies receiving approximately 180,000 TPA of cement asbestos waste, ESA members can play a significant role ensuring that standards are brought back in line with industry expectations, legislation and lead with best practice.

There are two appendices to this guidance.

The first appendix sets out the minimum standards for receiving bonded asbestos (cement) in a clear way to avoid individual interpretation of what is acceptable.

The second appendix helps to guide disposal site managers in the actions / decisions that need to be taken in the event that material is received that does not comply with the minimum standards.

Appendices:

1. Minimum standards for receiving bonded asbestos (cement) waste
2. Actions to be taken in the event of non-compliant material




References:

HSE Guidance note em9: Disposal of Asbestos Waste

Control of Asbestos Regulations 2012

ESA members own internal documentation

Appendix 1: Minimum standards for the receipt of bonded asbestos (cement) waste

MATERIAL CONDITION (hierarchy of condition)		MATERIAL CONDITION (representative example)	MATERIAL CONTAINMENT (hierarchy of compliance)	
1	Whole / unbroken pieces (i.e. roofing sheets, pipes) or large pieces with limited breakage (i.e. roofing sheet broken in two)			Enclosed container (double wrapped / bagged in UN-approved packaging) - em9 COMPLIANT
				Open container (individually double wrapped / bagged in UN-approved packaging)
				Open container (whole content double wrapped in UN-approved packaging)
				Enclosed container (unwrapped)
2	Broken pieces			Enclosed container (double wrapped / bagged in UN-approved packaging) - em9 COMPLIANT
				Open container (double wrapped / bagged in UN-approved packaging)
3	Smashed pieces			Enclosed container (double wrapped / bagged in UN-approved packaging) - em9 COMPLIANT
				Open container (double wrapped / bagged in UN-approved packaging)
<ul style="list-style-type: none"> Broken / smashed bonded asbestos (cement) waste should always be double bagged / wrapped A single (standard) sheet over the top of an open container containing damaged or broken asbestos (cement) waste is not an acceptable control on it's own 				

Actions are required to be taken by the disposal site depending on how the material is presented

Actions are outline in the table below:

	Verbal instruction to the driver prior to leaving site PLUS Written notification issued to the haulier on the same day (preferably immediately) Material presentation is non-compliant -> 3 months to move to GREEN standard of material presentation
	Verbal instruction to the driver prior to leaving site PLUS Written notification issued to the haulier within 7 days The way in which material is presented, whilst partially compliant, needs to be improved to a GREEN standard of material presentation -> 6 months to move to GREEN material presentation
	No action required - em9 COMPLIANT

Appendix 2: Bonded asbestos (cement) disposal site - self audit / checks

Arrival - Weighbridge Checks		
Question	Response	Actions
Has the material arrived in the preferred method / containment for the type? (i.e. is it em9 COMPLIANT?)	Yes	None
	No	Ask why? Some waste types i.e. contaminated soils could be transported in open containers - confirm with site / operations manager
Is the Duty of Care (Waste) paperwork correctly completed	Yes	None
	No	<ul style="list-style-type: none"> ● Vehicle instructed to park up and site / operations manager contacted ● Site / operations manager contacts producer / carrier to attempt to resolve / correct any errors ● Load quarantined (if facility allows) or returned to producer
Is the driver carrying the minimum PPE required for tipping asbestos (disposable coverall, FFP3 mask, overshoes, gloves)?	Yes	None
	No	<ul style="list-style-type: none"> ● Issue correct PPE (first time) ● Remind carrier / customer of responsibilities under this guidance ● Notify carrier / customer that a repeat will result in a refusal to tip
Discharging		
Question	Response	Actions
Has the driver ONLY exited from the vehicle? / Is the area clear of other vehicles / people?	Yes	None
	No	Mobile plant operator instructs non-driver to return to cab and escalates to site / operations manager as a safety concern
Has the driver put on required PPE before tipping commences (disposal coverall, FFP3 mask, overshoes, gloves)?	Yes	None
	No	Mobile plant operator instructs driver to don correct PPE. Refusal to do so is escalated to site / operations manager and load cannot be tipped
Is the asbestos cement waste correctly bagged / wrapped / presented for the type? (i.e. is it em9 COMPLIANT?) (Observed by the mobile plant operator from inside air filtered cab - periodic 'audit' by site / operations manager)	Yes	None
	No	<ul style="list-style-type: none"> ● Waste covered ● Non compliance escalated to site / operations manager and producer / carrier notified (first time) ● Repeat non compliance from producer / carrier load is rejected
Are the sheets intact / bags undamaged?	Yes	None
	No	Damp down