Appendix 2

Handling of asbestos waste at a Waste Transfer Station:
Main Operational Features and Safe Systems of Work

1. Asbestos waste is defined as “hazardous waste” and, therefore, on removal from its original source, it should be appropriately packaged i.e. double bagged (or wrapped). UN-approved’ packaging must be used with the exception of bonded materials (such as, asbestos cement or textured decorative coatings) where proprietary packaging can be used.

2. Suitably bagged (or wrapped) waste must be taken to an appropriate waste site for disposal (usually a landfill site) (referred to hazardous waste site in England and Wales/special waste site in Scotland).

3. Asbestos waste should only be transferred in a secure storage facility which would normally be a lockable sealed skip. The skip should be taken directly from the place of removal to the disposal site (landfill).

4. In some circumstances it is impractical for the asbestos waste to be transported using a skip eg where small quantities of waste are involved. In these situations, the waste can be transferred by other means eg in a van which has the appropriate features and facilities including a dedicated specific sealed area or dedicated sealed container inside.

5. However, vans are not generally allowed onto landfill sites and consequently van-conveyed waste must be transported to an intermediary (and temporary) storage facility (ie a “Waste Transfer Station”). In waste transfer stations (WTS), asbestos waste will be transferred from the vans to lockable sealed skips for later onward movement to the landfill site. At this stage, it will be the responsibility of the waste transfer station operator to consign the waste to landfill.

6. The purpose of the WTS is to receive small amounts of asbestos waste (approximately ten bags/wrapped items). WTSs should not be accepting asbestos skips for further loading or bulking up. Also, asbestos waste should not be transferred between skips and it is not permitted to “dilute” asbestos waste by adding other materials to the skip.

7. The WTS must hold a permit for asbestos waste from the Environment Agency. In addition, the work activities on the station relating to asbestos are subject to the requirements of the Control of Asbestos Regulations (CAR) 2012.

8. To meet the requirements of CAR 2012, the waste transfer station has to be appropriately designed and there should be adequate arrangements and procedures (ie risk assessments, systems of work/plans of work) in place to ensure that exposure to asbestos is prevented or reduced to as low as reasonably practicable. In addition, the systems should ensure that the spread of asbestos is prevented.

9. Design of the Waste Transfer Station (WTS):

- The facility should be designed to accept small amounts of waste delivered in vans from the asbestos removal industry and other trades. Some may also accept asbestos waste from the public.

- The WTS should be designed to ensure that handling and contact with asbestos is minimised and such that all surfaces and equipment are easily cleanable.

- Asbestos skips should be located remotely from other waste containers ie in a segregated area. This enables the disposal of asbestos waste to be managed away from the public involved in the disposal of other wastes. Asbestos skips should also be stored on impermeable surfaces with sealed drainage.

- The WTS should be designed so that vehicles can drive close to the skip to allow bags/items to be easily and simply transferred directly from the van to the skip.

- A system is required to ensure safe vehicle movement around the site ie traffic management system with regulated access; controlled movement of skips and other vehicles as necessary. The system may require pedestrian segregation, demarcation of traffic routes, use of one-way system etc.

10. Reception of Asbestos Waste

- There should be a system in place to deal with the reception and checking of consignment notes and of vehicles. Inspection will be required to verify the amount, and type of waste.

- Checking will also be necessary to ensure that the waste is properly packaged (ie double wrapped/labelled etc) and that the waste packaging is secure/undamaged etc.

- Deliveries should be checked by staff trained in asbestos recognition and handling.

11. Delivery of Asbestos Waste:

- Asbestos containing waste is typically delivered to WTSs by licensed asbestos contractors; non licensed (trades) contractors; and members of the public.

    a. Where a licensed asbestos contractor takes asbestos they should retain responsibility for handling the waste. These workers are professionally trained in asbestos. There is no need for the waste to be handled by anyone other than the licensed contractor.

    b. Where non-licensed asbestos waste is delivered to the station by contractors the expectation would be that the personnel would transfer their waste bags directly from their vehicles to the skip.

The organisations involved should have the appropriate asbestos training/PPE etc to handle the waste.

c. Where members of the public deliver asbestos waste the arrangements may have to be different as the type and packaging of the waste may be more variable. More thorough checking of waste type, labelling and packaging may be necessary. Further packaging/bagging may also be necessary prior to deposition.

- There should be facilities available to do this work. The expectation here would be that the public (after going through the formalities outlined above) they would transfer their waste bags/packaging directly from their vehicles to the skip (under the supervision of a WTS employee).

- WTS operators should be aware some members of the public may need assistance in lifting/handling waste bags.

12 Safe Systems of Work

- A system of work/plan of work should be devised to prevent or reduce any potential exposure to asbestos, and minimise risk to those who may be exposed.

- Work systems should be designed to ensure that waste bag handling is minimised. The handling of bags should not compromise the bag or its contents. Mechanical handling of bags (use of front-loading shovels etc. to move bags) should not bet permitted. In some circumstances (e.g. movement of large and heavy wrapped/sealed asbestos sheets) the use of a fork lift truck is acceptable, provided the operation is carried out in such a way that limits breakage,

- The waste must be taken from the delivery vehicle and placed directly into a lockable sealed skip. This procedure should be supervised and observed by trained WTS personnel. Skips must be kept secure and locked when asbestos wastes are not being deposited in them.

- Site operators must have procedures to deal with non-conforming asbestos wastes that may arrive at the facility. Non-conformance circumstances include wastes received not being properly contained in bags or wrapping, eg. unwrapped bonded asbestos sheets.

- Sites should also have the capability to deal appropriately with any spillages that may occur e.g., from damaged/leaking bags (see below).

- Skips that have been used to store asbestos wastes should not be used for non-asbestos uses unless they are verified as clean; otherwise the skip must be fully decontaminated. The decontamination of a skip should be done in accordance with normal asbestos decontamination procedures.

- In summary, a system of work at the WTS should be devised to prevent or reduce any potential exposure to asbestos, and minimise risk to those who may be exposed. It can be summarised as follows:

  - Provide a lockable sealed skip at the waste transfer station.
  - The licensed/non-licensed (trades) contractors and members of the public should report to reception as soon as they arrive at the WTS.
  - The waste deliverer should complete the paperwork with WTS management prior to depositing waste.
  - A vehicle inspection is carried out by WTS management to confirm the contents of the load.
  - The waste deliverer drives vehicle to sealed skip and, wearing appropriate RPE and PPE, opens it, removes double packaged waste from rear of their vehicle and carefully places double packaged asbestos waste into skip.
  - Contractor/WTS personnel closes skip.
  - The entire process should be monitored/supervised by WTS management.
  - The waste deliverer completes paperwork with waste WTS management prior to leaving site.
  - When the reception skip is full, the WTS management arrange for it to be taken to landfill.

13 Other Issues:

- *Other Control Systems*:

  Dust suppression facilities should be available to deal with emergencies or other spillages. (for example, hand pressurised spray equipment and a hose pipe with a fine spray attachment).

- *Training: Site Staff*

  Suitable training is required for all staff to ensure that they are competent to accept and handle asbestos waste safely (for example, at least level 2 training for non-licensable asbestos work including non notifiable licensed work –see paragraphs 238-245 –ACOP for Managing and Working with Asbestos release- L143). Training topics should include awareness training (identification of asbestos types/products and potential risks to health from exposures) and procedure for working with asbestos (appropriate use of equipment, bag handling methods, site cleaning, Emergency Procedures, use of PPE, decontamination procedures etc.).

14 Emergency/Asbestos spillage procedures

- It is foreseeable that asbestos waste may be presented unpackaged or inappropriately packaged, or that the containment packaging splits

on site. In these circumstances, the following precautions should be taken:

- Clear the area of non-essential personnel;
- Put on PPE (see Section 15);
- Cordon off the area using cones, bunting and signs;
- Dampen down the area to prevent particles becoming airborne;
- Pick up/clean up spilled material and place in asbestos waste bags or plastic sheeting and seal with tape;
- Place wrapped asbestos into an asbestos skip;
- The asbestos symbol 'Warning Contains Asbestos' should be displayed wherever asbestos is contained (e.g. bags, other packaging, skips etc).

- If the situation is beyond the training and expertise of site staff, appropriate procedures should be in place to obtain expert advice and assistance from a Licensed Asbestos contractor. The contractor should evaluate the risk and decontaminate the area if necessary.

- If an emergency situation arises where gross contamination with asbestos insulating board; or lagging is found (for example, dumped in general waste skips or discarded elsewhere on site) then. The contaminated area should be cleared of people and cordoned off; and. advice and assistance should be sought from a Licensed asbestos contractor..

15 PPE and personal decontamination

- Any staff involved in any direct contact with asbestos eg handling bags/items, general cleaning up in asbestos areas or cleaning spills etc. should wear appropriate PPE and RPE.

- The PPE should consist of disposable Type 5 coveralls, and cleanable lace-less boots or wellingtons. RPE should consist of disposable FFP3 masks or half-masks with a P3 filter. Staff should be fit-tested for the RPE they are using.

- Disposable PPE should be removed and placed in asbestos waste bags whilst footwear should be decontaminated (for example, cleaning in an external footbath).

16 Non -licensed notifiable work

- CAR 2012 requires, some non-licensed work, where the risk of fibre release is significant, to be notified. This would include work undertaken at waste transfer stations and is, subject to three additional requirements: notification of work; medical examinations; and record keeping (the requirement for medical examinations does not come into force until April 2015). (See the decision flow chart for

notifable non licensed work below).