Date 8th March 2012

Asbestos Liaison Group Technical Sub Committee (ALGTSC)

Minutes of the meeting of the ALG TSC held on the 8th March 2012 Hertel offices Preston Brook

Present:

Martin Gibson (HSE), Colette Willoughby (BOHS), Steve Sadley (ARCA), Steve Watkins (UKATA), Terry Slater (ACAD)

Apologies for absence:

None

1.0 Introductions, apologies and welcome:

Martin Gibson welcomed all attendees to the meeting and thanked Steve Watkins for preparing the minutes from the last meeting. It was agreed that Martin would continue as the meeting Chair and Colette would prepare the minutes for this and subsequent meetings.

2.0 Minutes of last ALGTSC meeting (No.6) and acceptance:

The minutes of the ALGTSC meeting held on the 27th January 2012 had been issued in draft form but due to the short time interval between meetings there had not been sufficient time for all to fully review them. Items 3 & 9 were identified as requiring some amendments with any additional comments to be made to Steve W.

Action:

Comments to be made to Steve within the following week

3.0 Matters Arising from the minutes:

Section 3 - Item 10 The entry into live enclosures by other trades

It was felt that in the case where other trades were required to enter a live enclosure for planned work the requirement for them to hold a licence was not practical. Trades entering enclosures is likely to happen fairly frequently. Consideration needs to be given to a staged approach:

- Planned works
- Unplanned works
- Real/immediate emergency works.

The possibility of these tradespeople becoming direct employees was discussed using a master/servant relationship and which had previously been deemed an acceptable arrangement by Greg Haywood.

Action:

A draft memo is to be produced to cover trades entering enclosures. Terry to take the lead, assisted by Steve S. memo to be produced and circulated to committee by 23rd May 2012.

Section 3 – Enclosure Ventilation Study

The study is still underway.

Action:

Martin will circulate the report once completed.

Section 3 - Carbon Monoxide in Decontamination Units.

This action is to be carried forward and included within an ALG memo.

Section 3 - Outside Man – see main agenda

Section 3 - Suppliers

ACAD are putting together an audit for ancillary suppliers to make sure they have good quality control which extends into their supply chain. Terry will circulate the audit form for information.

Action:

No action on this committee at the moment

Section 6 – Gas and electrical safety in DCUs – see main agenda

Section 8 – Gas cylinder storage – see main agenda

4.0 Soffit Guide

A second draft soffit document was circulated on 31st January 2012. Additional comments have been received following this circulation. Martin met with the Glass and Glazing federation to discuss their concerns (see below). The document is now close to completion and will then be issued.

The main points of concern are:

- (a) Concerned about the wording 'scaffolding' as would be better described as suitable access equipment. The document will include a text box which will give examples of suitable access equipment.
- (b) There was some uncertainty regarding the term 'full enclosure'. It was considered to be something which enclosed the whole building. The document will include a box to demonstrate a partial enclosure and also a full enclosure. A partial enclosure will extend up to around waist height. A full enclosure will fix to the slope of the roof. A clearance will be undertaken at the end of the job. If using a partial enclosure then the contractor can move on provided they get the analyst in at the end of the job to check everything, which will include putting the access equipment back in place to provide access for their visual inspection.
- (c) Concerned about the removal of difficult screws/bolts. Suggested to use WD 40 to loosen screws and bolt croppers if screws protrude above the ACM. The document will include a text box to deal with difficult screws/bolts/nails etc.
- (d) For some jobs eg which involve removing the windows and the soffit, there was concern about who carries out work first; LARC to remove soffit or window replacement contractor. If the window is tight against the soffit then do they remove the window and leave the soffit for the LARC or should the LARC remove the soffit first. Concerns raised about removing the window first as this may result in the weight of the unsupported soffit then collapsing.
- (e) Concerned regarding what can be used to provide non-slip working platforms. Consideration given to the use of rubber/plastic mats similar to those used for

showers and baths. The document will include comments on this. It is Martin's intention to have the document completed asap.

Action:

- (1) Martin to circulate completed document to committee, Glass & Glazing Federation plus ALG.
- (2) All to circulate any photographs relevant to soffit enclosures around domestic properties for inclusion in the document.

5.0 Gas and Electrical Safety in DCUs.

A draft guidance document/memo was produced by Steve S and circulated for discussion at the meeting. The document covered both electrical and gas safety checks along with required qualifications to support competence of anyone carrying out the tests. Discussions were had with regards to each type of test.

Electrical:

There are requirements for various tests to be carried out. One requirement is for 3 monthly checks with a requirement for additional checks carried out every 1 to 3 years based on the electricians view when examining the unit.

It would appear that the 3 monthly checks do not get carried out as these need to be done by a qualified electrician. The question was posed – is there a need for these 3 monthly checks? They are also very onerous and would result in 4 tests per year.

The additional check carried out every 1 to 3 years is based on the electricians view at which point he indicates the timescale for when the follow up test is carried out. Steve S advised that after having consulted a company who undertakes such testing that they were unaware of any instances where the recommend re-check interval had been identified as 1 year and that the typical interval is 3 yearly checks. This extended period supported the thought that the 3 monthly checks may be un-necessary. Further advice will be provided by the electrical expert within HSE.

Gas:

Approximately 90% of DCUs have boilers with open flues even though this is contrary to the ACoP. The boilers are sited within a sealed unit so maybe classed as not being within the unit itself. There is a move to install carbon monoxide monitors within DCUs but depending upon where these are fitted then they may not pick up elevated levels. The main issues relate to adequate maintenance of the boiler and sufficient ventilation. Consideration needs to be given to alerting DCU manufacturers to produce DCUs where the boiler/flue is outside. It was reported that annual gas checks are routinely being carried out.

The document/memo contains lots of useful information such as the specification for the unit and door signage but it was felt that perhaps it should be trimmed down so that it just related to maintenance requirements including specifications for gas & electrical safety.

Legionella:

2 documents were provided by Steve W relating to the potential for legionella bacteria within DCUs and requirements to prevent this. The issues are with respect to retention of water in storage tanks & use of that water plus cleaning of the tanks & shower heads. The relevant points from the two documents can be incorporated into the maintenance memo.

Action:

- (1) Martin to circulate the document/memo to the Gas Safety expert within HSE
- (2) Martin to circulate the document/memo to the Electrical Safety expert within HSE
- (3) Steve S to check if there are any more frequent gas checks required
- (4) Steve S to trim memo down to concentrate on maintenance plus gas/electrical specifications & safety requirements. To be circulated to committee by 23rd May 2012.
- (5) Martin to send the information from L8 regarding shower heads & recirculating tanks to be provided by end of April 2012.

6.0 Outside Man

It was agreed that there is no need for a permanent outside man in most situations. However where there are security or safety issues such as within hospitals, schools or where the client requires it, then a permanent outside may be necessary. A risk assessment should be used to identify the circumstances where a permanent outside man is required.

Action dismissed

7.0 | Face Fit Testing

For a number of months HSE inspectors have been looking at the certificates issued by Face Fit Testers. Concerns were raised as they have been seeing a lot of high fit factor values. Guidance advises that if face fit factor values of over 100,000 are achieved (eg in several exercises or tests) then this should be queried. HSL have been looking at the fit testing and tests being carried out which has identified that the guidance provided in paragraph 55 of OC/28228 is not being followed.

3 companies were visited and at each it was noted that there were issues with the probing technique and more specifically the probe not being situated within the right location. This can therefore result in leaks not being detected plus high fit factors being recorded. The investigation revealed evidence of poor fit test practice for these companies.

Fit-2-fit accreditation, which was brought in during 2009, is aimed at ensuring the competence of those carrying of face fit testing. The accreditation process has not focused specifically on probing technique. The process will now be revised to include probing method.

HSE is also currently planning to take action to alert both face fit testers and mask manufacturers.

The current view is that this may be an industry wide issue and that where poor probing technique is identified, there will be a lack of confidence in any of the tests which have been carried out. Consequently many face fit tests may need to be re-done. This has less of an impact for the licensed asbestos removal contractors as the contractors guide (HSG 247) advises of the need for annual face fit testing and so this will suffice with regards to re-doing the tests. There is however more of an implication for analysts as there is no current analytical guidance requiring annual face fit and so this will be something additional which will now need to be undertaken. This is also the same for other industries where RPE is worn. The information relating to the face fit testing issues will also be displayed on the HSE website within a number of weeks.

Action:

- (1) HSE will be writing to all owners of the Portacount face fit testing machines to make them aware of the problems. This will be led by the Construction sector.
- (2) Correct probing technique can be more easily achieved by using a small ball at the end of the probe/tube ("ball sample probe"). The individual is more able to feel the probe and can confirm it is in the correct place before the test starts.
- (3) Where poor probing technique is identified, fit test companies should review the need for retesting. In many situations face fit tests will need to be re-done as there can be no or little confidence in the current ones.
- (4) Information to be displayed on the HSE website.

8.0 Any Other Business

8.1 **RPE** and the 1 hour rule – this issue was raised by Colette from one of the forum sites. The request had related to a site where contaminated soil was being excavated and the machine operators and others had been identified as needing to wear masks to prevent exposure. Half face rather than full face masks had been chosen due to the increased risk if full face (powered) masks were worn through restricted vision. Comments had been made requesting information as to why 1 hour had been identified as the cut-off (approx.) time for wearing non-powered respirators before taking a break as this was proving impractical. It had been assumed that this time interval had been identified as a result of a medical study and information had been requested with regards to the details of the medical study. Martin believed that the timing had been identified through human factors studies. This work had identified that people begin to feel uncomfortable when wearing a mask for long periods and were therefore more likely to start to move the mask. This action could then result in insufficient protection being provided especially if the person was hot and sweating as the seal would not be as effective. Martin confirmed that wear-time, type of work being carried out and other factors would need to be considered as part of the risk assessment when deciding on the most appropriate RPE to be worn.

Action:

Colette to provide feedback to the forum member.

8.2 Asbestos Paper on Pipework – this issue was raised by Colette from a member of the NORAC group. A request had been received to undertake reassurance air monitoring during the removal of asbestos paper beneath MMMF insulation on pipework. The work as to be carried out using the wrap and cut method, without an enclosure. The member was concerned that this would be classed as notifiable work and in light of the article which had been published within the HSL newsletter 'Fibre Aspects' were concerned that if they did not carry out the correct testing then they would be equally liable for the incorrect work. Their query was whether or not this work should be notified plus the need to undertake a 4 stage clearance for licensable work.

It was acknowledged by the committee members that this was quite a long standing issue within the industry which sparked different advice dependent upon who was asked. It was generally believed that this would be a licensable activity as the paper would be classed as insulation. The method of removal would determine whether or not the control limit would be breached.

Martin advised that the paper was not acting as insulation and in accordance with paragraph

	35 of the ACoP L143 would be a material which satisfied the exemptions within Regulation 3(2), (c).	
	Action: Colette to provide feedback to the NORAC group.	
9	Date of Next Meeting	
	30 th May 2012 to be held at the Hertel offices, Preston Brook.	
	All meetings are scheduled to start at 10:30am	