

Appendix 1a/21

Minutes of the 28th meeting of the Asbestos Network Technical Working Group (ANTWG), 12th Feb 2021

Composition of TWG = HSE, BOHS, FAAM, ACAD, ARCA, UKATA, Independent Industry Representative

Asbestos “Cleans” (Environmental Cleaning)

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.

Purpose

1. This document seeks to provide clarity of certain terms used in asbestos cleaning and removal activities. These terms include “environmental clean”, “re-clean”, and “pre-clean”. The document also provides guidance on the application of these terms and their “licensing” position.

Establishing the Category and Type of Work

2. In all situations where asbestos containing materials (ACMs) are (or are likely to be) involved, any work activity is “work” with asbestos and is subject to the requirements of the Control of Asbestos Regulations (CAR) 2012. There is no regulatory distinction between “cleaning up” of ACMs and “removal” of ACMs (or indeed between any other work-related activity where ACMs are handled or disturbed). These activities are all subject to CAR2012. The nature and duration of the activity (including cleaning up of ACMs) will determine the standard and type of controls that should be employed and whether the work is likely to be licensed (and require notification) or not. Incorrect classification of the work may lead to insufficient control and asbestos exposure and spread. It may also not comply with legal requirements.

3. It is the responsibility of the asbestos contractor to assess the nature and circumstances of the work as well as the likely duration to establish if the work will be licensed or not.

Asbestos Work

4. Clearly there are different broad categories of asbestos work. These include: “removing” ACMs from any location (e.g. still in place or attached to surfaces/other items or materials, or material present as debris/rubble/waste); removing remaining material

from a previous poor job (e.g. removal of surface residues) often called “re-cleans”; and “cleaning-up” of mostly loose (i.e. unattached) material such as asbestos dust, debris and broken-off pieces and fragments (sometimes called “environmental cleans”). Jobs may also be a combination of these activities.

5. The type of the asbestos product involved, the duration of the work and the nature of work will determine the level of risk and the appropriate level of control. It will also determine whether the work is licensed or not. The work will be licensed where “licensed” ACMs (as defined in CAR 2012 Reg 2(1) i.e. asbestos coating, asbestos insulation or asbestos insulating board (AIB)) are involved unless the work meets the short-duration and other exemption criteria (*See Notes 1 and 2*). This applies irrespective of the nature of the work including any “re-cleans” or any type of cleaning-up of ACMs (e.g. “environmental cleans”). Cleaning-up activities include simply lifting or picking up or wiping up or collecting/vacuuming up material.

6. As highlighted above, work will be licensable where “licensed” materials/products are involved. Work will also be licensable for other products where exposure is likely to exceed the Control Limit or the sporadic and low intensity (SALI) limit. It is important to note that a “licensed material” is not defined by its asbestos constituent type (e.g. amosite, crocidolite etc). Therefore, if a suspect asbestos material or item is not clearly identifiable as one of the specified licensable products (e.g. it is present in a degraded or deteriorated form or as unidentifiable debris) or it has only been identified as containing an asbestos constituent type (e.g. amosite), then any removal or cleaning activity would not necessarily be licensed work. This applies to all asbestos waste/debris work situations but is particularly relevant to soils and made ground where the exact nature of asbestos dust/debris or degraded/deteriorated material is often difficult to establish.

“Environmental Cleans”

7. The term “environmental clean” has been used in asbestos work to describe certain types of asbestos clean-up and related activities. These cleaning-up activities include simply picking or wiping up or collecting/vacuuming up material loose or unattached material such as asbestos dust, debris and broken-off pieces and fragments. The ACMs may be derived from asbestos incidents or disturbances or from deterioration/damage of asbestos products. There may also be other associated asbestos remnants still in place which have to be removed.

8. The term has not been formally defined in Health and Safety legislation or associated ACOPs and Guidance. The term has been used in some circumstances where there has been uncertainty as to whether a licence is required to carry out the work. The term may have been applied in some situations to incorrectly enable “licensed removal” work to be carried out without notification or appropriate controls.

9. **“Environmental Cleans” will be licensed work** where licensable products are involved (unless the work meets the “short duration” and other exemption requirements

(See Notes 1 and 2)). However, the risk of asbestos exposure and spread in these circumstances (i.e. picking/wiping/vacuuming up etc) is likely to be lower than in most typical removal situations where ACMs have to be scraped from surfaces or physically removed from the fabric of the building. The control regime for Environmental Cleans will reflect these lower risks and should be established in the risk assessment.

“Re-cleans”

10. A significant amount of current licensed work notifications involve “Re-cleans”. These are situations where surface residues (e.g. “snots”) or other asbestos materials remain in place despite prior licensed removal work. Previous removal has been incomplete for various reasons e.g. the material has been simply “missed” or was too stubborn or hard to dislodge (e.g. attached to concrete surfaces) and/or was located in restricted or confined positions. The material is often randomly spread particularly over imperfect surfaces. **“Re-cleans” are asbestos removals and will be licensed** unless the work meets the short-duration and other exemption criteria (see Notes 1 and 2). “Re-cleans” should be differentiated from “environmental cleans”.

“Pre-Clean”

11. Cleaning-up or removal of displaced asbestos materials prior to the start of the main/formal “removal” (or stripping) process involving licensed ACMs (i.e. before erecting the enclosure) is often referred to as a **“pre-clean”** (or possibly as an “environmental clean”). ACMs may have been dislodged or spread from previous damage or disturbance. This pre-clean is essentially the initial phase of the licensed removal job. **It is licensed work.**

12. A **“pre-clean”** is defined in the Licensed Contractors Guide (HSG 247) (paragraphs 6.27-6.28). The pre-clean is part of the inspection process to prepare a site/job for asbestos removal work. The proposed work area should be inspected and assessed. The main purpose of the inspection is to identify the need for a pre-clean and to prepare the site for work (e.g. by sheeting over or removing items, i.e. a “soft strip”), and to deal with matters which may impede or cause difficulties in obtaining clearance certification (e.g. remaining ACMs, wet floors etc). The inspection should be performed in the areas where clearance will be required i.e. the planned enclosure area, the relevant surrounding places such as transit and waste routes, and the area immediately next to where the enclosure will be located. The “pre-clean” will involve cleaning-up minor ACM dust and debris. The activity is work with asbestos and will require appropriate dust suppression controls and adequate RPE and PPE to be employed.

Non-Licensed Work

13. For the sake of completeness, it is important to highlight that there may also be circumstances where asbestos removals including clean-ups will be non-licensed. In some clean-up situations, this work may also be described as an “environmental clean”. It is the responsibility of the contractor to establish if licensed or non-licensed products are involved. A non-licensed clean-up/environmental clean would involve situations where

non-licensed products are present (e.g. asbestos cement items) or the quantities of licensable material or the affected area were relatively small such that the duration of the work would meet the “short duration” and other exemption criteria (*See Notes 1 and 2*).

14. The definitions, applications and licensed status of the various terms listed above are summarised in Table 1.

Note 1: *“Short duration work” is defined in CAR2012 Regulation 2(3) and explained in L143 ACOP paragraph 31. “Short duration work” means that the total time spent by all personnel working on asbestos insulation and AIB does not exceed two hours in a seven day period (including time spent setting up, cleaning and clearing up) and, also, no one person works for more than one hour in a seven day period.*

Note 2: *Work with asbestos insulation and AIB is licensable unless the work is short duration and the Control Limit and sporadic and low intensity (SALI) limit will not be exceeded. Any work on asbestos coating (surface coatings which contain asbestos for fire protection, heat insulation or sound insulation but not including textured decorative coatings) is always licensable, there is no short duration exemption, (L143 ACOP paragraph 30).*

References

[L143 “Managing and working with asbestos”, CAR2012 Approved Code of Practice and Guidance.](#)

[HSG247 “Asbestos: The licensed contractors’ guide”](#)

[HSG210 “Asbestos Essentials, a task manual for building, maintenance and allied trades on non-licensed asbestos work”](#)

Table 1: Definitions, applications and licensed status of various cleaning and removal terms used in asbestos work.

Activity/terminology	Situation	Classification/comment	Control Measures
Pre-clean	Cleaning-up/removing (e.g. picking /wiping/ vacuuming-up) asbestos dust, debris, and other items (including suspect materials) before starting main/formal removal of licensed ACMs.	Licensed* Pre-clean is the initial part of the licensed removal job.	Controls for licensed work as identified in risk assessment.
Re-clean	Cleaning-up/removing licensed ACMs remaining in place despite prior licensed removal work e.g. surface residues (snots).	Licensed*	Controls for licensed work as identified in risk assessment.
Environmental clean	Cleaning-up/removal of licensed ACMs particularly dust, debris, fragments, rubble etc.	Licensed*	Controls for licensed work as identified in risk assessment. Enclosure may or may not be practical or necessary.
Licensed removal work	Most work with asbestos coating, asbestos insulation and AIB. Includes cleaning-up of all licensable ACMs i.e. “pre-cleans”, “re-cleans”, “environmental cleans” and all other situations where licensable ACMs have been spread.	Licensed*	Standard licensed work removal controls including enclosures as appropriate.
Non-licensed work** (including cleaning-up or removal)	Cleaning up or removal of any amount of non-licensed ACMs and work where short duration criteria are met for AIB or asbestos insulation.	Non-licensed or Notifiable non-licensed work. Control Limit and SALI limit unlikely to be exceeded.	Controls in line with Asbestos Essentials: EM4, EM5, EM6, EM7, EM8 and relevant task sheets.
<p><i>Note:</i></p> <p><i>* Unless short-duration exemption criteria are met for AIB or Insulation.</i></p> <p><i>** Most “non-licensed” cleaning-up of material is likely to be “notifiable” (i.e. notifiable non-licensed work under CAR 2012 Regulation 3(2)) as it involves “degraded” material. AC debris will be an exception as fragments/debris of AC are regarded as individually non-degraded pieces. AC clean-up is likely to be non-notifiable under CAR 2012 Regulation 3(2).</i></p>			