
SafeNet Thought for the Day

2nd of June 2017

Work done on Asbestos containing products such as roof sheets, gutters, down pipes and water pipes

When driving pass buildings being renovated you often see Asbestos containing material such as roof sheets, slate tiles, gutters and down pipes being removed or already disposed of in the skip provided for the disposal of waste. In many cases the asbestos containing material was removed by the contractor without considering or complying with the legal requirements pertaining to work performed on Asbestos containing material.

The question now arises as to:

1. **What are the legal requirements should you wish to clean your Asbestos containing roof or remove Asbestos containing material?** - On the 29th of November 2010, The Department of Labour issued a memo in which they explain their interpretation. The memo in short states that any work done on Asbestos or Asbestos containing material which **MAY** result in the release of Asbestos fibres should be regarded as Asbestos demolition work and for this reason the legal requirements as listed below are to be complied with. Typical examples of work which may result in the release of Asbestos fibres are:
 - a. Cleaning of asbestos containing roof sheets by means of high pressure water hoses;
 - b. Removal of roof sheets, roof slate tiles, gutters and downpipes or any other material which may contain Asbestos. Asbestos was used in the manufacturing of more products than what most people would think as some older vinyl floor tiles, water pipes, water tanks and even window putty may contain Asbestos; and

- c. Removal or work performed on Asbestos lagging commonly found on steam pipes and exhaust pipes of standby generators.

The following legal requirements are to be complied with when performing any of above mentioned tasks:

- a. The services of a Department of Labour Approved Inspection Authority (AIA) for Occupational Health and Hygiene such as SafeNet (Africa) to be contracted as to draft and submit an Asbestos Work Plan. The Work Plan is a method statement and will prescribed all requirements to be complied with regarding:
 - i. Site preparation;
 - ii. Duties imposed on staff, client, owner of the property and / or body corporate;
 - iii. Personal Protective Equipment to be used;
 - iv. Cleaning or removal methodology to be applied;
 - v. Air monitoring requirements;
 - vi. Final cleanup of site; and
 - vii. Disposal requirements.

According to the legal requirement the Work Plan signed by all parties is to be submitted to the local office of the Department of Labour at least 14 days prior to any Asbestos work being performed;

- b. The services of a Department of Labour Registered Asbestos Contractor (RAC) to be contracted to perform the work on Asbestos containing material or the cleaning of roofs. The RAC should be able to on request submit a registration certificate issued by the Department of Labour. The registration must be renewed annually and it may therefore be important to check the validity date on the certificate. The fact that the contractor and his staff has undergone training on Asbestos, or the fact that he / she has years of experience does not make him a registered RAC;
- c. While the Asbestos work is being performed the AIA appointed must conduct airborne Asbestos monitoring as to determine concentration of Asbestos fibres released during the demolition or cleaning process. In some cases clearance sampling will also be required after all Asbestos work was completed as to

determine that workplaces are safe for entry. On completion of monitoring a formal report will be drafted and be sent to the client; and

d. All Asbestos containing waste to be disposed of on a hazardous waste site specially designated and registered for this purpose. Under no circumstances may Asbestos waste irrespective of the quantity be disposed of on a municipal waste dump. The RAC to be requested to submit a Safe Disposal Certificate as to ensure that all Asbestos waste removed from site was properly disposed;

2. **Do the same requirements apply irrespective of the quantity to be removed or the size of the roof to be cleaned?** – The current legislation does not distinguish or prescribe different requirements for different size Asbestos projects and all of the above mentioned requirements should therefore be complied with irrespective of the quantity to be removed or size of roof to be cleaned; and

Do these requirements apply to private home owners? – As with the quantity the legislation does not exempt certain premises or building. The same legal requirements will therefore apply should I wish to perform Asbestos work at my private home.

Enjoy your week
The team at SafeNet