

# Asbestos Analysts Inspection Programme 2014/2015

**BOHS CONFERENCE  
Harrogate April 2017**

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HSE, Edinburgh**



# Agenda

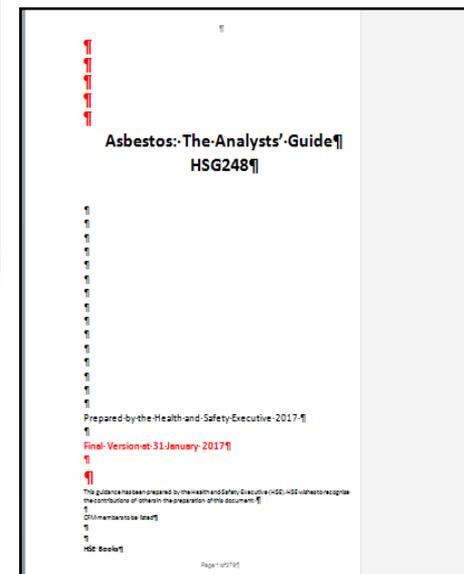
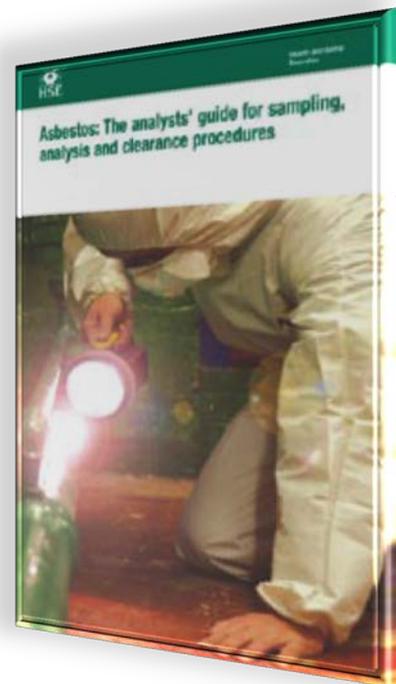


- **Aims and Objectives**
- **Study protocol**
- **Questionnaire findings**
- **Head Office and Inspection findings**
- **Analyst Comments**
- **Future actions**



# HSE's Aims and Objectives

- Obtain current details of the nature and scale of UKAS laboratories carrying out inspection work
- Assess work practices, policies, procedures and 4SC in a representative group of organisations
  - Head office visits
  - Site inspections
- Take any immediate action as necessary
- Obtain Analyst's perspective on issues
- Provide information to inform the review process of the Analyst Guide
- Produce a report to inform HSE and the asbestos industry



# Inspection/Selection Protocol

- **Questionnaire to all GB UKAS inspection bodies**
  - **To obtain basic information on scale/nature of business**
  - **This data used as part of selection process**
  - **95 “Responders” (40 “Non-responders”)**
- **“Responding” Organisations selected for visit/inspection on the basis of a number of criteria including:**
  - **Location**
  - **Frequency of audit**
  - **Number of 4SCs undertaken per day**
  - **Laboratory engaged by licensed contractors**
  - **Size of laboratory and number of analysts**
  - **Anything else from the questionnaires that rang alarm bells!**
- **An approx equal proportion of “non-responders” were also selected for Inspection!**

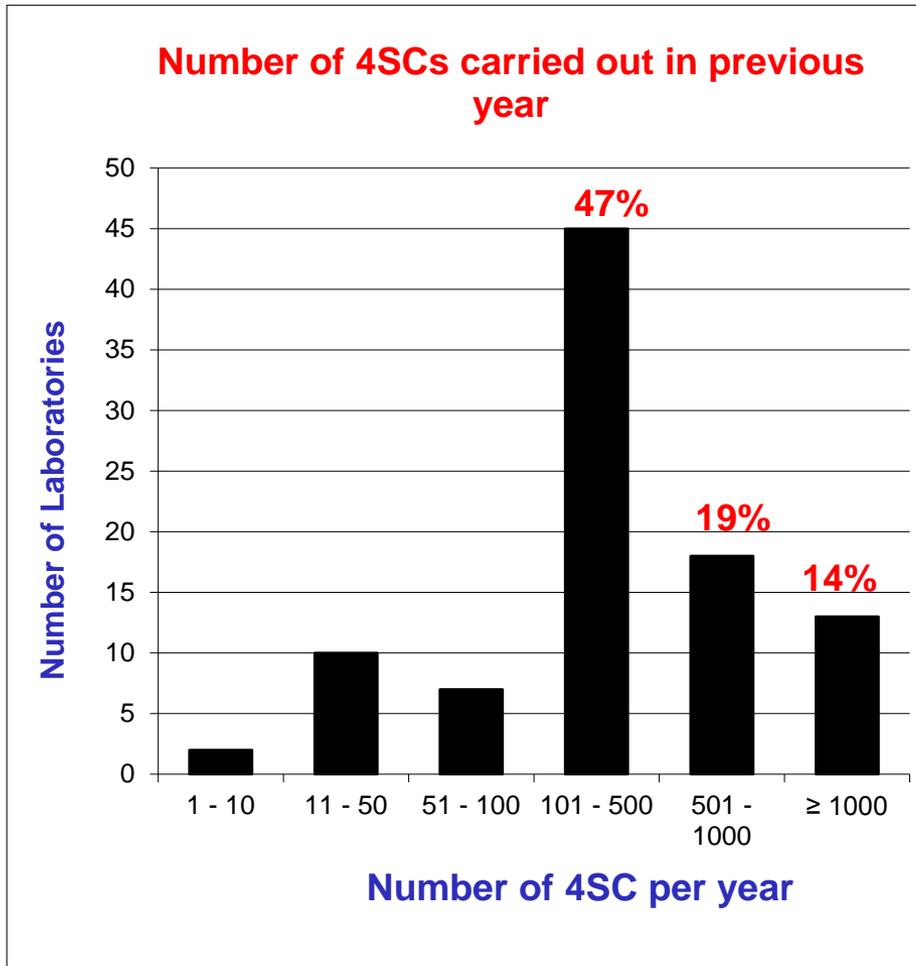


# Programme Protocol: Number of visits/inspections

- **22 Head Office visits:**
  - **Aide Memoire**
  - **Information collected included:**
    - Written procedures for entering enclosures and decontamination
    - Most recent UKAS audit report
    - Personal sampling and leak testing data
    - 4SC certificates
    - Analyst comments
  
- **20 4SC inspections:**
  - **Prearranged following HO visit**
  - **Aide memoire**
  - **Full assessment of:**
    - Site conditions
    - Analyst practices and procedures



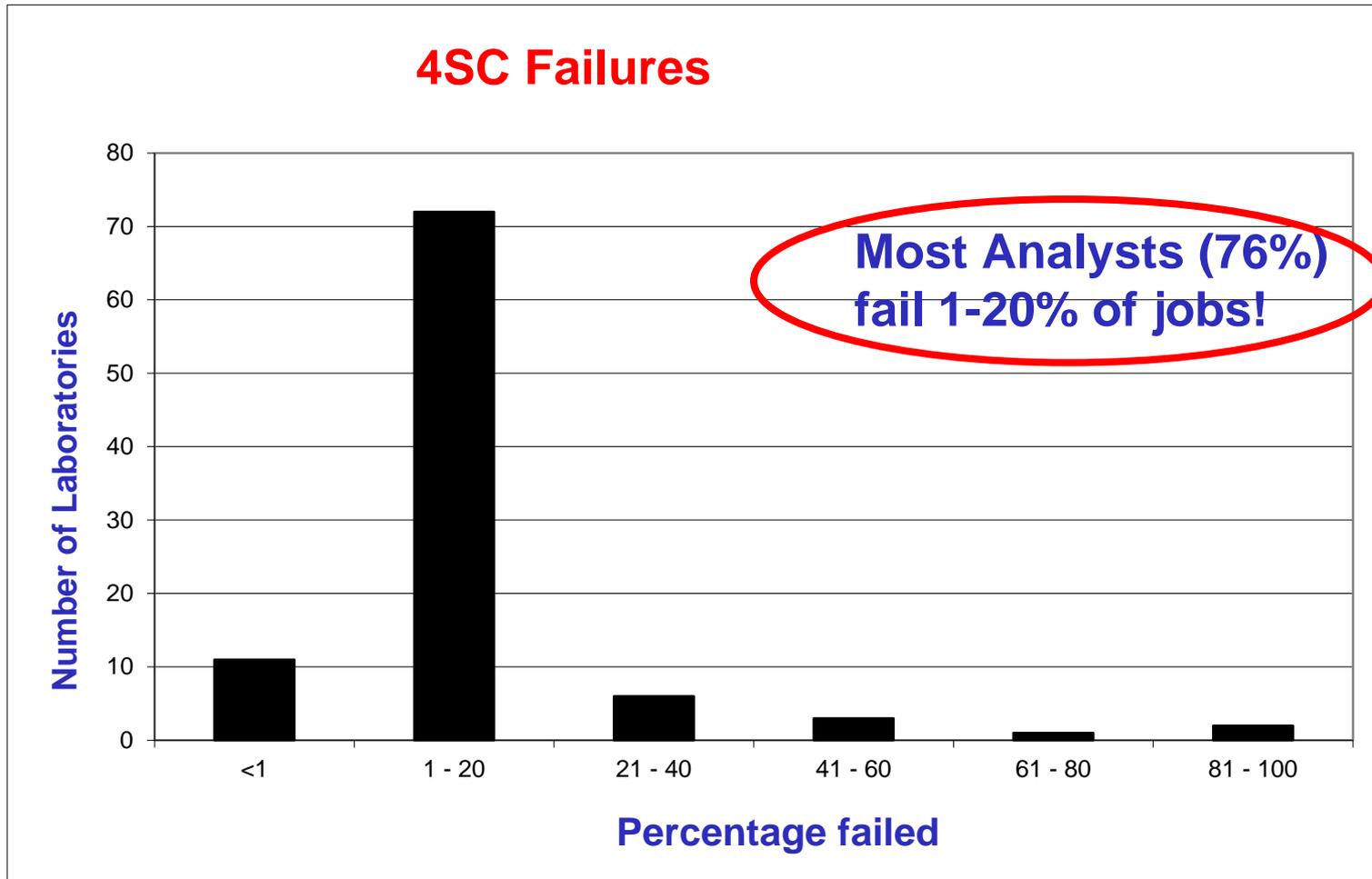
# Questionnaire Results (1): Number of 4SCs carried out in previous year



## 4SC summary:

- **95 respondents:**
  - 47% labs performed between 100-500 4SCs
  - 19% labs performed btw 500-1000 4SCs
  - 14% labs performed >1000 4SCs
- >40% 4SCs carried out by **13 labs!**
- >66% 4SCs carried out by **31 labs!**

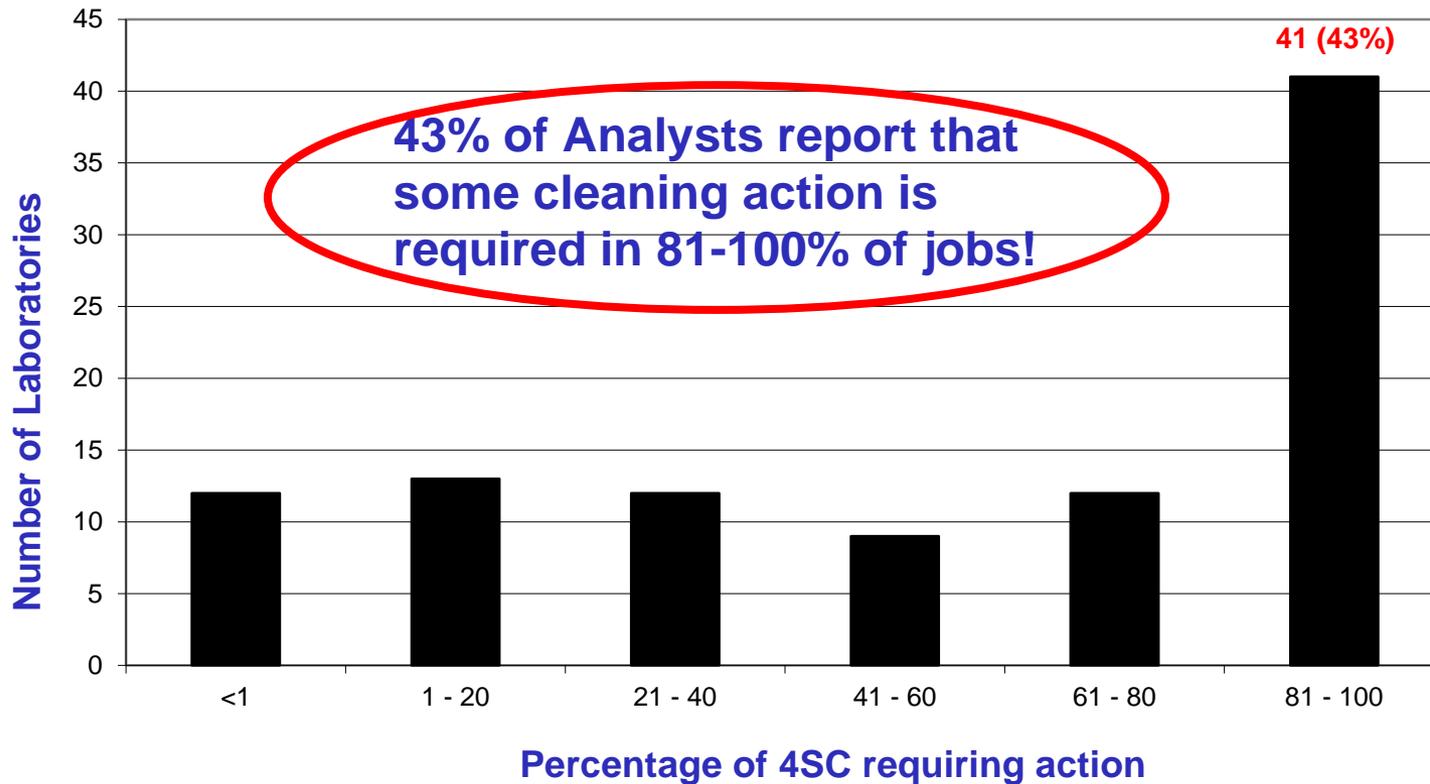
# Questionnaire Results (2): How often are 4SCs failed?



# Questionnaire Results (3): How often is additional action required?

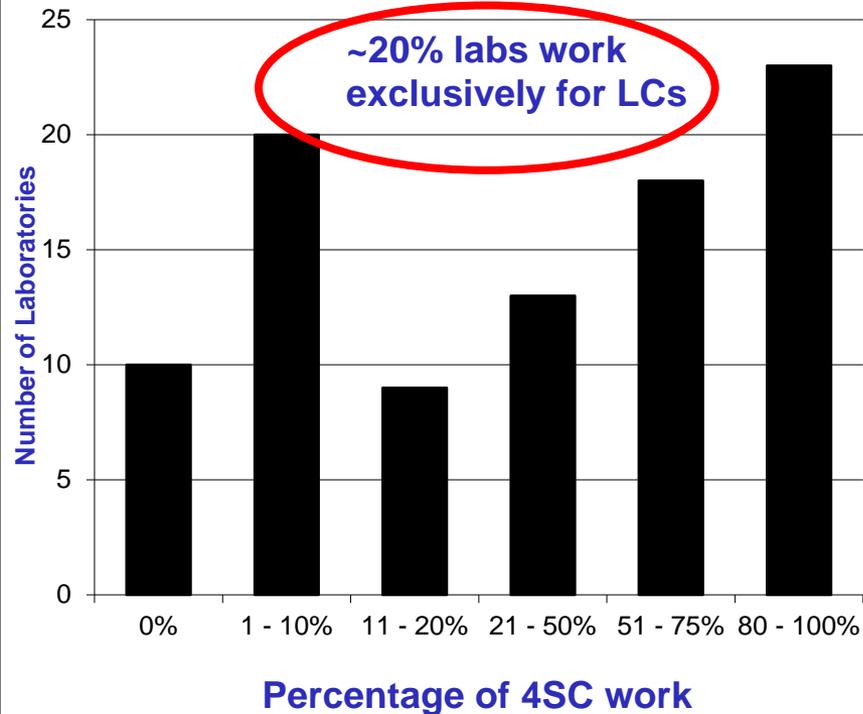


## 4SCs Requiring Action (ie additional cleaning)

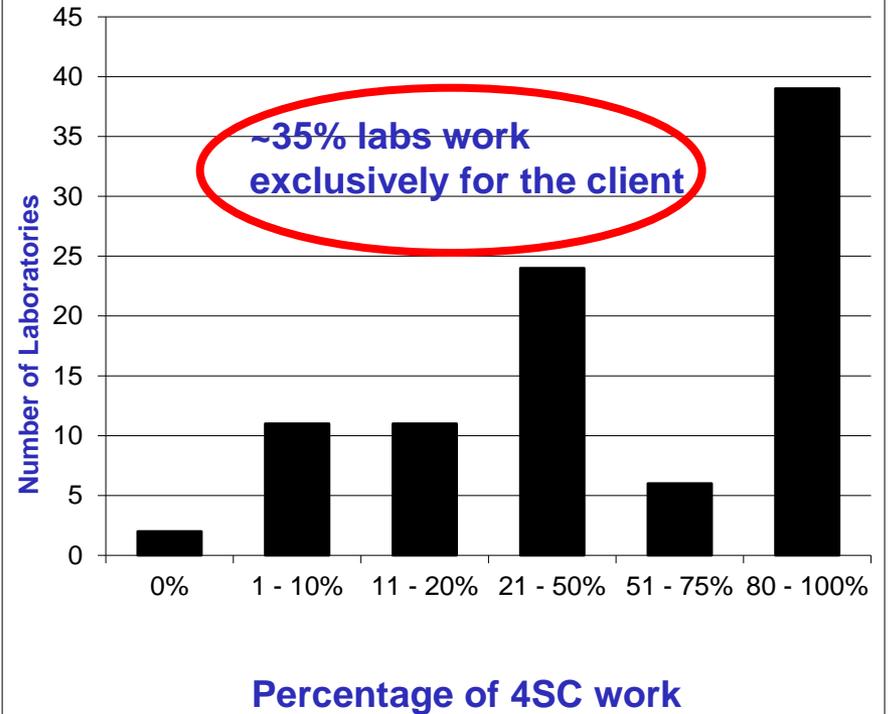


# Questionnaire Results (4): Source of 4SC Contract (in previous year)

Percentage of 4SC work engaged by licensed contractor



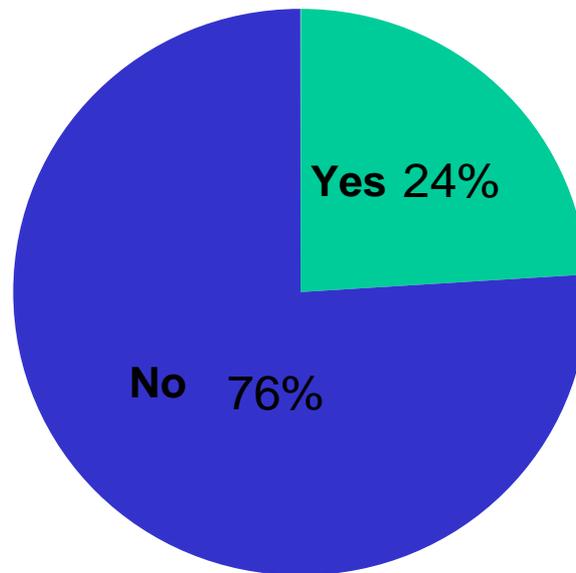
Percentage of 4SC work engaged by the client/property owner



# Questionnaire Results (5): Use of Photos in CfR



## Percentage of laboratories issuing photographs with certificate for reoccupation



# Results of 4SC Inspection Visits and Interrogation of Policies and Procedures



- **Caveat:**
- **These results/findings only apply to some Analysts!**

# Key findings: 4SC Stage 1: Preliminary Check on Site Conditions/Job Completeness



- Checks at Stage 1 not being carried out
- Basic DCU checks not being carried out
  - **Water supply good, waste bags etc**
- Lack of contextual information eg extent of debris/rubble etc
- Analysts reluctant to challenge contractor about transit route



# Key findings: 4SC Stage 2: Thorough Visual Inspection



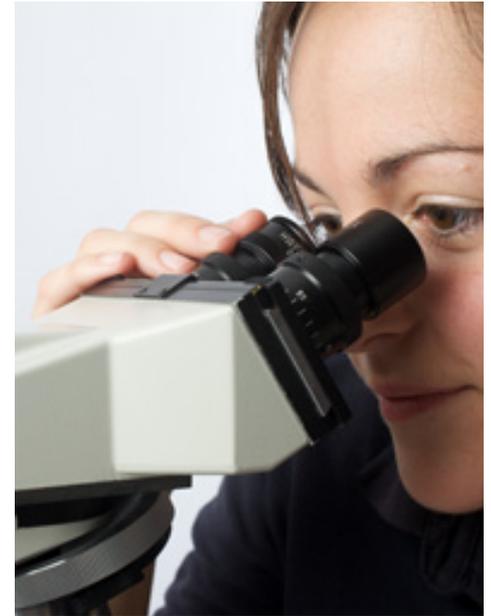
- Analyst cleaning enclosure themselves during visual inspection
- Progressive and systematic visual inspection not carried out
  - **Analysts moving around randomly**
- Lack of contextual information regarding conditions found



# Key findings: 4SC Stage 3: Clearance Air Monitoring



- Regular DCU clearances being undertaken at the same time as stage 3
- Insufficient time to count slides
  - **One example: 3 slides in 9 mins**
- Discrepancies with timings and fibre concentrations recorded on CfRs
  - **Timings between stages and sampling times**
  - **Fibre concentrations wrongly calculated, decimal places incorrect**
- One Analyst “forgot” brush (used a cloth!)



# Other Key findings:

## Personal H&S/Decontamination (Training)

- Laboratory decontamination procedures poor
  - **Absence of written procedures**
  - **No practical training provided**
- Domestic clothing worn underneath coveralls
  - **4 people**
  - **2 Analysts arrived on-site without coveralls!!**
- **2 Analysts unshaven!**
- **Analysts unsure when to use DCU for decontamination**
- **Incorrect entry/exit procedures (eg preliminary decontamination not undertaken on exiting enclosure)**
- **Analysts showering or going through DCU after each stage of 4SC.**



# Other Key findings:

## Additional Cleaning Required!



### Thorough Visual Inspection (Stage 2):

- “Nearly all cases additional cleaning work was required for pass”
  - **43% Analysts stated that cleaning was required in 81-100% of jobs!!**
- Formal failure certificates not issued in these situations
- LC alerted and carried out extra cleaning
- Many Analysts carried out “minor” cleaning themselves
  - **One example: Analyst used vac for 1hr 10mins**
- Serious implications:
  - **Workers not thoroughly cleaning**
  - **“It is very rare that site supervisor carries out an inspection before Analyst arrives”**

# Other Key findings: Airborne Monitoring



## Personal “Operatives”:

- Very short term: many only 10mins
- Absence of supporting contextual information
  - Only “removal works”
- Often quoted results less than the LOD



# Analyst Perspective



- Numerous comments re client should be appointing the Analyst
- Some Analyst thought they were at a commercial disadvantage because they do a “proper” job.
- LCs under pressure from clients on costs/completion times:
  - Has led to pressure on Analysts: Some considered “too fussy” when carrying out “thorough visual inspection”
- Competition pressure has lowered prices leading lower standards
- Concerned about the additional cleaning required:
  - “Rare” for supervisors to carryout proper visual inspection
  - Analysts believe there is a shortage of trained supervisors/Operatives now performing visual inspection

# Inspection: Outcomes

## Implications for Analysts and Contractors:



- **Analyst Implications:**

- **Information used in update of Analyst Guide:**

- **PPE/RPE and decontamination policies/procedures**
- **More robust procedures for 4SC:**
  - **Duration of thorough visual inspection**
  - **Photos**

- **Licensed Contractor implications:**

- **Will be covered in revised Licensed Contractors Guide:**

- **Representative personal sampling**
- **Thorough cleaning of work area/enclosure**
- **Supervisor to thoroughly inspect**
- **Waste/transit route to be clear**

