

1. ASBESTOS MANAGEMENT

1.1 DOCUMENTATION FOR OCCUPATIONAL AND ENVIRONMENTAL MANAGEMENT

Table 1 provides a summary of the documentation required by TNPA Program/Project Managers. This information will need to be complied by any Principal Contractor, Sub-Contractor or any other person's activities on sites where some asbestos contaminated soil remains in place.

Table 1: Summary of the required SHE documentation

ITEM No	DOCUMENTATION	TIMING	LEGAL REF:
1	Copy of an Approved Asbestos Work Plan, (Approved by an AAIA).	Before starting the contract	Asbestos Regulations, 2001. Regulation No 21 and 16.
2	Proof of employee Training and Information (Asbestos) e.g. certificates.	Before starting the contract	Asbestos Regulations, 2001. Regulation No 5 and 16.
3	Proof of Medical Surveillance, both lung function and x-rays. (for all employees working on an asbestos contaminated site-site)	Before starting the contract	Asbestos Regulations, 2001. Regulation No 9 and 16.
4	Provide a report on air monitoring results (asbestos), whilst undertaking work on a contaminated site.	Upon termination of the contract.	Asbestos Regulations, 2001. Regulation No 8. and16.

5	Where applicable, provide all Certificates of Safe Disposal and / or Waste Manifest documentation for any asbestos contaminated soil removed from a contaminated site.	Upon termination of the contract.	TNPA requirement.
6	Where applicable, provide details e.g. a register or inventory of quantities and locations (GPS co-ordinates of the removal and final storage sites) of any clean soil removed from any TNPA owned site. This soil must be declared clean by an AAIA before being transported off-site. In addition, provide details e.g. a register or inventory of quantities and locations (GPS co-ordinates of the removal and final storage sites) of any asbestos contaminated soil transferred within any TNPA owned site.	Upon termination of the contract.	TNPA requirement.
7	Letter from TNPA Health & Safety and Environmental Departments stating the site has been adequately capped or otherwise rendered in an acceptable condition regarding asbestos contaminated soil.	Upon termination of the contract.	TNPA requirement.

1.2 Approved Asbestos Work Plan Guideline

A site specific Approved Asbestos Work Plan (either drawn up by the contractor or AAIA). This Work Plan will need to be approved by an AAIA with a copies forwarded to Provincial Director Health and Safety Inspectorate (Department of Labour) and the designated TNPA Programme/ Project/Managers. The following provides guidance on specific issues that need to be addressed within the Approved Asbestos Work Plan:

a) *Notification:*

Any contractor or person who intends to carry out any work involving the movement of soil either within or from these sites, shall first notify the designated TNPA Programme/ Project Managers for TNPA, as to the location and nature of the work involving contaminated soil and the intended use of any excavated soil.

b) *Respiratory Protection:*

Describe how the contractor will protect the health of themselves and their employees from possible exposure (inhalation) to asbestos fibres as a result of working on a listed asbestos contaminated site.

c) *Recognition and Action:*

Describe procedures to be followed by all persons on-site when encountering surface or sub-surface asbestos in order to prevent further spread and contamination of asbestos throughout the site (see paragraph 9 below *Implementation Example*).

d) *AAIA (DoL):*

During soil disturbing activities, an AAIA or person whose ability to perform the measurements is verified by an AAIA, will need to be involved with regards to air monitoring, soil inspections, site audits and the provision of advice on the general management of soil on-site. The name and role of the nominated AAIA will need to be included in the Approved Asbestos Work Plan.

e) *Dust suppression:*

Where construction vehicles are used, outline the continuous use of water trucks on the sites i.e. on access roads and temporary soil stockpiles.

f) *Environmental Management:*

The intended use of disturbed soil e.g. temporary stockpiling, backfill or disposal (provision of documented proof if there was any off-site movement of soil i.e. disposal records). ***Please note, under no circumstances shall any soil, crusher-run or any type material be transported off site without the express permission of the designated AAIA, TNPA Programme Managers, TNPA Representatives or where applicable, the Principal Contractor Manager.***

g) *Medical Surveillance:*

Ensure that all employees undertaking work on the listed sites and who therefore may be exposed to asbestos containing dust, must undergo medicals which include both Lung Function testing and Chest X-Rays. The employee must also be certified fit to work by an Occupational Medicine Practitioner.

h) *Registered Asbestos Contractor (Department of Labour):*

Where applicable, describe the roles of the Registered Asbestos Contractor regarding the removal of soil off-site and the provision of Certificates of Safe Disposal.

i) *Roles and Responsibilities:*

The Tenant, Principal Contractor or Sub contractor where applicable, must provide the designated TNPA Programme Manager with the name of a person (to be shown in the Approved Asbestos Work Plan) responsible for the 1) implementation of the plan, 2) maintenance of records / documentation, 3) on-site management of the plan and 4) his/her reporting line, e.g. to be included in the SHE File compiled by the responsible person.

j) *Tenant Closure:*

If a tenant decides or is instructed to terminate a lease agreement with TNPA, the tenant is responsible for ensuring that any soil disturbing activities that may have been undertaken on their site, that was previously capped, is not left uncapped (ref capped. Definitions), prior to termination of the lease.

k) *Contractors Closure:*

The Principal Contractor must provide a description of the intended final state of the site's surface upon completion of the contract e.g. Crusher-run, Premix, concrete, paving, planting of vegetation or exposed soil. TNPA Occupational and Environmental Management Departments will conduct an asbestos site audit during and before termination of the contract.

l) *Documentation:*

Copies of the following documentation must be provided to the designated TNPA Programme/ Project/Technical Managers:

14.3 Training and Information

Ensure that all employees undertaking work on the listed sites and who therefore may be exposed to asbestos containing dust, are adequately and comprehensively informed and trained, on both practical aspects and theoretical knowledge, with regard to asbestos that may be encountered onsite (as per Regulation 5. of the Asbestos Regulations 2001). Training can be provided by somebody who is competent to provide it and has adequate personal practical experience and theoretical knowledge of all aspects relating to the handling of asbestos contaminated soil. Proof of training will be kept in the site Health and Safety files which will be handed over to the designated TNPA Programme Project Managers upon completion of the work / contract. It is important that all employees are able to recognise asbestos in order to take appropriate action to prevent contaminating themselves, inhaling fibres or further spreading of the asbestos throughout the sites.

14.4 IMPLEMENTATION OF WORK

Upon initiation of the contract and during soil disturbing activities undertaken upon listed sites, the following actions will need to be included in your Approved Asbestos Work Plan. These actions are intended to prevent employees from contaminating themselves, inhaling fibres or further spreading of the asbestos throughout the sites i.e. mixing contaminated soil with uncontaminated soil.

- a) The work must be immediately and temporarily halted.
- b) The designated AAIA or Principal Contractor manager must then be contacted to determine the extent of contamination as well as the appropriate route of action. This step normally involves the manual picking-up and bagging of asbestos **by a designated Registered Asbestos Contractor**.
- c) The designated Registered Asbestos Contractor must provide the Principal Contractor with a certificate of safe disposal from a disposal site authorised to receive asbestos contaminated soil (authorised by DEA).
- d) The Principal Contractor in consultation with the AAIA will provide the contractor with permission to continue excavation type work.
- e) All contractors must co-operate with AAIA personnel in order to document (type, quantities and location) as well as control the movement of any soil, crusher-run or any type material moved within the listed site.
- f) If required, soil to be used as backfill may be stockpiled within a designated area, directed by the AAIA or Principal Contractor manager who will inspect the stockpile and provide guidance in this regard.
- g) Any soil requiring removal from any listed site, will first be cleared for removal by the AAIA or Principal Contractor manager. The contaminated soil will be transported to the Approved Landfill for Asbestos disposal.
- h) Asbestos contaminated soil will be transported to the landfill site in accordance with the requirements of Regulation 19 of the Asbestos Regulations, 2001.