Mirvac Real Estate Pty Ltd

Hazardous Chemicals Assessment

75 George Street, Parramatta NSW

28 November 2022

Project Ref: 754-SYDEN228268

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HAZARDOUS CHEMICALS ASSESSMENT

Prepared for
Mirvac Real Estate Pty Ltd

Prepared by
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Quality information

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EXECUTIVE SUMMARY

Tetra Tech Coffey Pty Ltd (TTC) was commissioned by Mirvac Real Estate Pty Ltd (the client) to conduct a Hazardous Chemicals Assessment (assessment) of the office building, located at 75 George Street, Parramatta, NSW (the site). Ben McCann conducted the assessment on 26th October 2022.

Assessment Findings

Summary of Hazardous Chemicals Identified on Site

The following table presents a summary of the approximate total volumes of hazardous chemicals stored on site by hazard class. It also details whether placarding and/or manifests are required for any hazardous chemicals stored in bulk at the site. Refer to **Appendix B** for full hazardous chemicals register.

Hazard Class	Approximate Quantity Stored on Site	Placarding Required	Manifest Required
Class 2.1 ï Flammable gases	-	-	-
Class 2.2 ï Non-flammable, non-toxic gases	398kg	-	-
Class 3 ï Flammable liquids	20L	-	-
Class 3 (Category 4) ï Combustible liquids	1,000L	-	-
Class 5.1 ï Oxidising substances	-	-	-
Class 5.2 ï Organic peroxides	-	-	-
Class 6.1 ï Toxic substances	-	-	-
Class 8 ï Corrosive substances	225L 9 x batteries	-	-
Class 9 ï Miscellaneous	2L	-	-
Unknown and/or Unclassified	101.2L	-	-

Observations

The following observations were made at the time of the assessment (refer to **Appendix A** for a photographic supplement):

- Quantities of hazardous chemicals stored on site did not exceed the threshold levels for placarding and manifest requirements.
- The majority of the inspected hazardous chemicals observed on site were securely stored in sealed containers and provided with adequate secondary containment, however the Integra CWT BT 1032 container in the Level 7 cooling tower area was not stored within secondary containment at the time of inspection.

- The majority of the inspected hazardous chemicals appeared to be appropriately labelled, however an inappropriately labelled 5L chemical container was identified in the Ground Level Cleaners Store Room at the time of the assessment.
- Hazardous chemical storage areas appeared to be appropriately ventilated.
- A copy of the hazardous chemicals register was not readily accessible within any of the hazardous chemical storage areas at the time of the assessment.
- Spill kits were observed in the Cleaners Store Room and the Generator Room on the Ground Level, however a spill kit was not available in close proximity to the hazardous chemicals stored in the Level 6 and 7 cooling tower areas.
- Emergency eye wash stations were available within the Level 6 Chiller Room and the Ground Level Cleaners Store Room. The contents were within date (expiry April 2025).
- Appropriate fire safety measures appeared to be available within hazardous chemical storage areas e.g. dry chemical fire extinguisher (last tested in May 2022) available adjacent to the Generator Room entrance.
- Hazardous chemical storage areas were secured from unauthorised access (e.g. within locked rooms).
- Incompatible hazardous chemicals generally appeared to be appropriately segregated, however a Class 8 corrosive substance (Research Products, Punch) was observed stored with Class 3 flammable liquids (Recosol, R55 Shellite and Diesel) in the Ground Level Generator Room.
- Safety Data Sheets (SDSs) were available for the majority of hazardous chemicals stored on site, however SDSs were not available in all hazardous chemical storage areas e.g. diesel in the Generator Room and refrigerant in the Chiller Room.
- The majority of the SDSs reviewed on site were current (within 5 years of issue date), however a number of the SDSs reviewed were not current e.g. the SDSô s f o r t h e c o o l i n g t o w chemicals expired in 2020/2021.

Recommendations

The following recommended actions (and the associated indicative recommended timeframes) are provided based on the findings and observations presented above:

High Priority (action within 1 month)

No high priority actions are required.

Medium Priority (action within 3 months)

- Remove the Class 8 corrosive substance (Research Products, Punch) from the Generator Room and ensure that it is kept apart from any Class 3 flammable liquids by at least 3m.

Low Priority (action within 6 months)

- Ensure the Integra CWT BT 1032 container in the Level 7 cooling tower area is stored within an appropriate secondary containment or removed from the site.
- Ensure the inappropriately labelled container in the Ground Level Cleaners Store Room is either appropriately labelled or removed from the site.
- Provide an appropriate spill kit in close proximity to the Level 6 and 7 cooling tower areas e.g. within the Chiller Room.
- Ensure a copy of the hazardous chemicals register for the site is made available and is readily accessible to workers in each relevant hazardous chemical storage area at the site.

- Ensure that printed SDS copies are available and readily accessible for all hazardous chemicals in each relevant storage area (e.g. diesel in the Generator Room and refrigerant in the Chiller Room), as well as within a central storage hub.
- Replace any expired cooling tower (water treatment) chemicals with current versions.
- Require as a condition of service contract, that all contractors engaged at the site provide a register of the chemicals they intend to use/store on site as well as a current SDS.
- Ensure all staff and contractors working within chemical storage areas at the site are provided with appropriate information, instruction and training to ensure they are able to work safely in these areas. It is recommended that this be managed within the site induction.
- Implement a periodic hazardous chemicals assessment at the site to ensure the requirements are being maintained and the register remains current. It is recommended that such a review is performed at least once every five years, or when significant changes are made to the hazardous chemicals used/stored on site.
- A copy of this report and register should be made available to any staff and contractors working within the relevant areas at the site.

1. INTRODUCTION

Tetra Tech Coffey Pty Ltd (TTC) was commissioned by Mirvac Real Estate Pty Ltd (the client) to conduct a Hazardous Chemicals Assessment (assessment) of the office building, located at 75 George Street, Parramatta, NSW (the site). Ben McCann conducted the assessment on 26th October 2022.

1.1 Site Description

The site consisted of a 6 level (approximately 9,535m^2) office building. The building was occupied at the time of the assessment. Key chemical storage areas included the Level 6 and 7 plant areas, and the Generator Room and Cleaners Store Room on the Ground Level.

1.2 Assessment Objectives

The objectives of this assessment were as follows:

- Conduct a visual inspection of all common areas (tenanted areas were not included) at the site.
- Liaise with relevant site personnel and collect data on the location, type, quantities, use and function of the hazardous chemicals stores on site.
- Assess the risks associated with the storage of hazardous chemicals on site.
- Evaluate the effectiveness of risk control measures implemented at the site to manage hazardous chemical storage.
- Provide recommended actions to rectify any identified non-conformances and minimise the identified risks.
- Prepare an up-to-date hazardous chemicals register for the site.

2. METHODOLOGY

The assessment consisted of an on-site visual inspection to identify and assess, so far as reasonably practicable, the presence, location and condition of hazardous chemicals at, on, and associated with the site. Areas were visually inspected for containers and storage vessels that may contain any potentially hazardous chemicals. Visual assessment of the type of all hazardous chemicals identified was conducted with product details recorded including estimated volumes, and whether the contents were labelled or indicated through signage. All chemical storage areas were accessed, where reasonably practicable, and where no access was available, locations were recorded within Section 2.1 of this report. The assessment was carried out methodically, systematically and diligently to make sure all relevant areas of the premises were inspected.

Hazardous properties of each hazardous chemical stored on site were collated from the Safety Data Sheets (SDS). Where the SDS was unavailable, generic hazardous properties for the class of hazardous chemicals were used. For each hazardous property identified, an assessment was made to determine whether this hazardous property resulted in a risk to occupants of the chemical storage area or any adjacent areas.

Data collected during the assessment was compared to the legislative documents and standards listed in Section 7.

2.1 Inaccessible Areas

The following areas were not accessible at the time of the assessment. The presence/absence of hazardous chemicals in these areas cannot be confirmed until further investigation can confirm or refute the presence.

- Occupied areas/tenancies.
- Areas not specified as chemical storage areas.

3. DUTIES OF THE PCBU

A Person Conducting a Business or Undertaking (PCBU) of a premises where hazardous chemicals are stored and handled has a duty to identify the hazards associated with the hazardous chemicals and control the risks arising from their storage and handling. The following duties must also be carried out by the site PCBU:

- Provide appropriate consultation, training, induction and supervision to all workers who are required to work within hazardous chemical storage areas.
- Prepare a register of all hazardous chemicals stored or used at the site.
- Obtain current SDSs for all hazardous chemicals stored or used on site.
- Prepare a manifest of any hazardous chemicals stored in bulk quantities above the relevant threshold limits.
- Display appropriate placards for hazardous chemicals stored in bulk quantities above the relevant threshold limits.
- Ensure hazardous chemical storage areas are appropriately ventilated.
- Ensure hazardous chemical containers and pipework are protected from damage.
- Ensure all hazardous chemical containers and pipework are appropriately labelled.
- Ensure that incompatible hazardous chemicals are appropriately segregated.
- Ensure appropriate spill containment provisions are provided for all hazardous chemicals.
- Ensure suitable fire safety measures are available and appropriately maintained.
- Provide health monitoring to workers who may be exposed to hazardous chemicals in levels exceeding the relevant exposure standards.

Note: The above duties are specified in Part 7.1 of the *Work Health and Safety Regulation 2017 (NSW)*. The PCBU of this site is considered to be the Property Manager.

4. BACKGROUND INFORMATION

4.1 Definitions

Definitions of key terms used in this assessment report and within the hazardous chemicals register are provided below:

- Hazard Class ï The nature of a physical, health or environmental hazard under the Globally Harmonised System of Classification and Labelling of Chemicals (GHS). Refer to Section 4.2 for further details.
- Hazard Category ï A division of criteria within a hazard class in the GHS. Refer to Section 4.3 for further details.
- Hazardous Chemical ï A substance, mixture or article that satisfies the criteria for a hazard class in the GHS, as defined in the *Work Health and Safety Regulation 2017 (NSW)*.
- Manifest ï A summary of the key information about specific dangerous goods stored at a site, intended to be provided to emergency services in the event of an emergency. Only required for hazardous chemicals stored in large quantities over the threshold limits detailed in the *Work Health and Safety Regulation 2017 (NSW)*.
- Placard ï Signage intended to provide a clear visual warning to emergency services that hazardous chemicals are stored at the site. They include outer warning placards, to be installed at the vehicle entrances to the site, and location placards, to be installed on or adjacent to each

container or storage area. Only required for hazardous chemicals stored in large quantities over the threshold limits detailed in the *Work Health and Safety Regulation 2017 (NSW)*.

4.2 Hazard Classes

Classes of relevant dangerous goods are listed below:

- Class 2 – Gases.
  - Division 2.1 – Flammable gases.
  - Division 2.2 – Non-flammable, non-toxic gases.
  - Division 2.3 – Toxic gases.
- Class 3 – Flammable liquids.
- Class 5 – Oxidising substances and organic peroxides.
  - Division 5.1 – Oxidizing substances.
  - Division 5.2 – Organic peroxides.
- Class 6 – Acute Toxicity.
  - Division 6.1 – Acute Toxicity.
- Class 8 – Corrosive substances.

Note: It is possible for substances to display more than one characteristic, therefore these substances may fall under more than one hazard class. In such circumstances the substance will have a primary hazard class and a subsidiary class. Subsidiary classes are displayed in brackets in the Hazard Class column of the Hazardous Chemicals Register.

4.3 Hazard Category

To further assist with the identification of hazardous chemicals and their particular hazards, hazard classes are assigned with a hazard category. This represents the level of danger to persons exposed to the hazardous chemical. Hazard categories include the following:

- 1 – Great danger.
- 2 – Medium danger.
- 3 – Minor danger.

5. ASSESSMENT FINDINGS

The assessment findings are detailed in the following sections. Refer to **Appendix A** for a photographic supplement and **Appendix B** for the full Hazardous Chemicals Register.

5.1 Summary of Hazardous Chemicals Identified on Site

The following table presents a summary of the approximate total volumes of hazardous chemicals stored on site by hazard class. It also details whether placarding and/or manifests are required for any hazardous chemicals stored in bulk at the site. Refer to **Appendix B** for full hazardous chemicals register.

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Class 3 (Category 4) ï Combustible liquids	1,000L	-	-
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Class 5.2 ï Organic peroxides	-	-	-
Class 6.1 ï Toxic substances	-	-	-
Class 8 ï Corrosive substances	225L 9 x batteries	-	-
Class 9 ï Miscellaneous	2L	-	-
Unknown and/or Unclassified	101.2L	-	-

5.2 Observations

The following observations were made at the time of the assessment (refer to **Appendix A** for a photographic supplement):

- Quantities of hazardous chemicals stored on site did not exceed the threshold levels for placarding and manifest requirements.
- The majority of the inspected hazardous chemicals observed on site were securely stored in sealed containers and provided with adequate secondary containment, however the Integra CWT BT 1032 container in the Level 7 cooling tower area was not stored within secondary containment at the time of inspection.
- The majority of the inspected hazardous chemicals appeared to be appropriately labelled, however an inappropriately labelled 5L chemical container was identified in the Ground Level Cleaners Store Room at the time of the assessment.
- Hazardous chemical storage areas appeared to be appropriately ventilated.
- A copy of the hazardous chemicals register was not readily accessible within any of the hazardous chemical storage areas at the time of the assessment.
- Spill kits were observed in the Cleaners Store Room and the Generator Room on the Ground Level, however a spill kit was not available in close proximity to the hazardous chemicals stored in the Level 6 and 7 cooling tower areas.
- Emergency eye wash stations were available within the Level 6 Chiller Room and the Ground Level Cleaners Store Room. The contents were within date (expiry April 2025).
- Appropriate fire safety measures appeared to be available within hazardous chemical storage areas e.g. dry chemical fire extinguisher (last tested in May 2022) available adjacent to the Generator Room entrance.
- Hazardous chemical storage areas were secured from unauthorised access (e.g. within locked rooms).

- Incompatible hazardous chemicals generally appeared to be appropriately segregated, however a Class 8 corrosive substance (Research Products, Punch) was observed stored with Class 3 flammable liquids (Recosol, R55 Shellite and Diesel) in the Ground Level Generator Room.
- Safety Data Sheets (SDSs) were available for the majority of hazardous chemicals stored on site, however SDSs were not available in all hazardous chemical storage areas e.g. diesel in the Generator Room and refrigerant in the Chiller Room.
- The majority of the SDSs reviewed on site were current (within 5 years of issue date), however a number of the SDSs reviewed were not current e.g. the SDSô s f o r t h e c o o l i n g t o w chemicals expired in 2020/2021.

6. RECOMMENDED ACTIONS

The following recommended actions (and the associated indicative recommended timeframes) are provided based on the findings and observations presented above:

6.1 High Priority (action within 1 month)

No high priority actions are required.

6.2 Medium Priority (action within 3 months)

- Ensure that Class 5.1 oxidising substance (Hydro 375) and Class 8 corrosive substances (Hydro 256 and 260) in the Roof Level cooling tower area are kept apart by at least 3m.

6.3 Low Priority (action within 6 months)

- Ensure the Integra CWT BT 1032 container in the Level 7 cooling tower area is stored within an appropriate secondary containment or removed from the site.
- Ensure the inappropriately labelled container in the Ground Level Cleaners Store Room is either appropriately labelled or removed from the site.
- Provide an appropriate spill kit in close proximity to the Level 6 and 7 cooling tower areas e.g. within the Chiller Room.
- Ensure a copy of the hazardous chemicals register for the site is made available and is readily accessible to workers in each relevant hazardous chemical storage area at the site.
- Ensure that printed SDS copies are available and readily accessible for all hazardous chemicals in each relevant storage area (e.g. diesel in the Generator Room and refrigerant in the Chiller Room), as well as within a central storage hub.
- Replace a n y e x p i r e d c o o l i n g t o w e r SDSô s (and treatment chemicals) with current versions.
- Require as a condition of service contract, that all contractors engaged at the site provide a register of the chemicals they intend to use/store on site as well as a current SDS.
- Ensure all staff and contractors working within chemical storage areas at the site are provided with appropriate information, instruction and training to ensure they are able to work safely in these areas. It is recommended that this be managed within the site induction.
- Implement a periodic hazardous chemicals assessment at the site to ensure the requirements are being maintained and the register remains current. It is recommended that such a review is performed at least once every five years, or when significant changes are made to the hazardous chemicals used/stored on site.
- A copy of this report and register should be made available to any staff and contractors working within the relevant areas at the site.

7. REFERENCES

¶ Work Health and Safety Act 2011 (NSW).

¶ Work Health and Safety Regulation 2017 (NSW).

¶ Code of Practice: Managing Risks of Hazardous Chemicals in the Workplace, 2019 (NSW).

¶ Australian Standard 1940:2017 ó T h e S t o r a g e a n d H a n d l i n g o f f l a m m a b l

¶ Australian Standard 1596:2014 ó The Storage and Handling of LP Gasô .

¶ A u s t r a l i a n S t a n d a r d 3 8 3 3 : 2 0 0 7 ó T h e S t o r a g e a n d H a n d i n P a c k a g e s a n d I n t e r m e d i a t e B u l k C o n t a i n e r s ô .

8. LIMITATIONS

This report and the associated services performed by TTC are in accordance with the scope of services set out in the contract between TTC and the Client. The scope of services was defined by the requests of the Client, by the time and budgetary constraints imposed by the Client, and by the availability of access to the site.

TTC derived the data in this report primarily from visual inspections, examination of available records, and interviews with individuals with relevant information about the site. In preparing this report, TTC has relied upon, and presumed accurate, certain information (or absence thereof) provided by government authorities, the Client and others identified herein. Except as otherwise stated in the report, TTC has not attempted to verify the accuracy or completeness of any such information.

No warranty, undertaking, or guarantee, whether expressed or implied, is made with respect to the data reported or to the findings, observations, and recommendations expressed in this report. Furthermore, such data, findings, observations, and recommendations are based solely upon existence at the time of the assessment. The passage of time, manifestation of latent conditions or impacts of future events (e.g. changes in legislation, scientific knowledge, land uses, etc.) may require further investigation at the site with subsequent data analysis and re-evaluation of the findings, observations, and recommendations expressed in this report.

This report has been prepared on behalf of and for the exclusive use of the Client, and is subject to and issued in connection with the provisions of the agreement between TTC and the Client. TTC accepts no liability or responsibility whatsoever and expressly disclaims any responsibility for or in respect of any use of or reliance upon this report by any third party or parties. It is the responsibility of the Client to accept if the Client so chooses any recommendations contained within and implement them in an appropriate, suitable and timely manner.

APPENDIX A: PHOTOGRAPHS

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Photo 01. Class 3 and Class 8 chemicals stored together in Generator Room.

Photo 02. Emergency eye wash station in Chiller Room.

Photo 03. Spill kit in Cleaners Store Room.

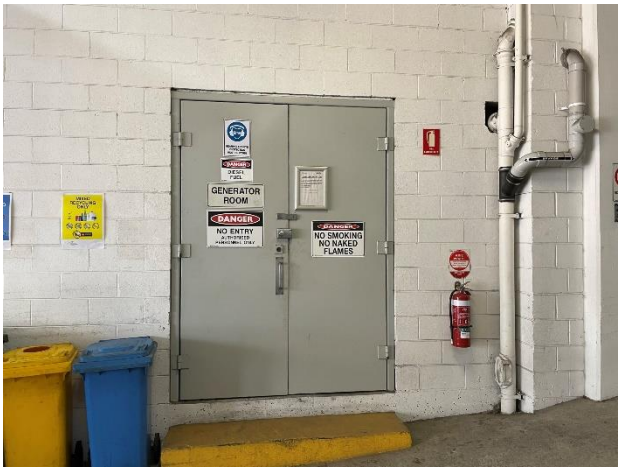

Photo 04. Dry chemical fire extinguisher adjacent to Generator Room entrance.

Photo 05. Water treatment chemical storage in Level 7 cooling tower area.

Photo 06. Cleaners Store Room. Bunded floor.