

Mirvac Real Estate Pty Ltd

Asbestos and Hazardous Materials Assessment

Hoxton Park Distribution Centre

40 Blackbird Close

Hoxton Park NSW 2171

21/01/2025



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Asbestos and Hazardous Materials Assessment

Prepared for

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Executive Summary

Tetra Tech Coffey Pty Ltd (Tetra Tech) was commissioned by Mirvac Real Estate Pty Ltd to conduct an asbestos and hazardous materials (hazmat) assessment of the Hoxton Park Distribution Centre located at 40 Blackbird Close, Hoxton Park NSW 2171 (the site).

The purpose of the hazmat assessment was to assess and document the health risks posed by hazmat, including asbestos containing materials (ACM) which are considered accessible during normal occupation of the building. This is in order to meet the requirements of the relevant State Regulations, Compliance Codes, Codes of Practice and Guidance Notes.

State/Territory legislation and industry guidance requires that the registers be used by and made available to property owners, employers, workers, persons intending business at the premises and Health and Safety Representatives, as part of an overall hazardous materials management plan designed to control the risks of exposure to hazardous materials.

The following hazardous building materials were identified at the time of the assessment:

Property	Asbestos Containing Materials		Lead Based Paint	Lead Containing Dust	Synthetic Mineral Fibre	Poly-chlorinated Biphenyls	Ozone Depleting Substances
	Non-Friable	Friable					
Hoxton Park Distribution Centre	-	-	-	-	✓	-	-

Full details of the material assessments can be located within **Appendix A: Asbestos and Hazardous Materials Register**.

Areas of No Access or Limited Access were present and are described in Section 2.2. It should be presumed that hazmat are present in these areas until further inspection can confirm or refute their presence.

A number of other recommendations were made in the body of this report which address the ongoing management of hazardous building materials at this site.

This executive summary must be read in conjunction with this entire report and the limitations contained therein.

The survey inspection conducted was not a destructive pre demolition/ refurbishment survey. A destructive hazardous building material survey must be carried out prior to any demolition or refurbishment works.

1. Introduction

Tetra Tech Coffey Pty Ltd (Tetra Tech) was commissioned by Mirvac Real Estate Pty Ltd to conduct an asbestos and hazardous materials (hazmat) assessment of the Hoxton Park Distribution Centre located at 40 Blackbird Close, Hoxton Park NSW 2171 (the Site). Ben McCann of Tetra Tech conducted the assessment on the 12/12/2024.

The survey inspection conducted was not a destructive pre demolition/ refurbishment survey. A destructive hazardous building material survey must be carried out prior to any demolition or refurbishment works.

1.1. Site Information

The asbestos and hazardous materials assessment was undertaken of the Hoxton Park Distribution Centre located at 40 Blackbird Close, Hoxton Park NSW 2171 (the site).

Table 1: Site Information	
Site:	Hoxton Park Distribution Centre, 40 Blackbird Close, Hoxton Park NSW 2171
Age (Circa):	2011
Site Description:	Industrial estate

1.2. Objective and Scope of Works

The objectives/scope of the asbestos and hazardous materials assessment was to:

- Identify the presence of the following confirmed and or suspected hazmat building materials within accessible areas of nominated building(s):
 - Asbestos Containing Materials (ACM);
 - Lead Based Paint (LBP);
 - Lead Containing Dust (LCD);
 - Synthetic Mineral Fibres (SMF);
 - Polychlorinated Biphenyls in fluorescent light capacitors (PCBs); and
 - Ozone Depleting Substances (ODSs).
- Collect samples of suspected ACM and/or LBP and LCD, for analysis by a NATA accredited laboratory;
- Visually determine the presence of SMF, PCB-containing light fittings and ODSs;
- Assess the risks associated with identified hazmat;
- Recommend risk management strategies to mitigate risks associated with ACM and other hazmat for removal and ongoing occupancy;
- Prepare a detailed assessment report in alignment with the requirements of relevant State/Territory Regulations, Compliance Codes, Codes of Practice and Guidance Notes, and
- Provide a copy of the assessment report in electronic (PDF) format to Mirvac Real Estate Pty Ltd.

2. Findings

The results of the asbestos and hazardous materials assessment are provided in a register format which is designed to provide readily available information about the presence of hazmat in the workplace.

2.1. Assessment Findings

The findings of this assessment are presented in tabulated format, including building materials that have been photographed and depicted in **Appendix A: Asbestos and Hazardous Materials Register**.

The following significant key findings are noted:

2.1.1. Asbestos Containing Materials

No suspect asbestos containing materials identified at the time of the assessment.

2.1.2. Lead Based Paint

No suspect lead based paint identified at the time of the assessment.

2.1.3. Lead Containing Dust

No suspect lead containing dust identified at the time of the assessment.

2.1.4. Synthetic Mineral Fibres

Location	Material Description	Risk Rating
Internal / GL / Northern Fire Pump Room / Pump Exhausts	Insulation Material	Very Low
Internal / GL / Northern Fire Pump Room / Underside of Ceiling	Sarking Insulation	Very Low
Internal / GL / Southern Fire Pump Room / Pump Exhausts	Insulation Material	Very Low
Internal / GL / Southern Fire Pump Room / Underside of Ceiling	Sarking Insulation	Very Low
Internal / GL / Sprinkler Valve Rooms / Underside of Ceiling	Sarking Insulation	Very Low

2.1.5. Polychlorinated Biphenyls

No suspect PCB containing capacitors identified at the time of the assessment.

2.1.6. Ozone Depleting Substances

No suspect ODS's identified at the time of the assessment.

2.1.7. Access Restrictions

Where no access or limited access areas have been identified it should be presumed that hazmat are present in these areas until further investigation can confirm or refute their presence.

No inspection can be guaranteed to locate all hazmat in specific locations. The assessment cannot be regarded as absolute, without extensive invasion of structures. Future demolition and or renovation to site structures may expose situations, which were concealed or otherwise impractical to access during this assessment.

2.1.8. No Access Areas

The following areas were not accessible at the time of the assessment:

- Within live electrics, plant and ductwork throughout
- Areas outside the scope of assessment
- Tenanted areas
- Roof

2.1.9. Limited Access Areas

Access to the following areas was limited at the time of the assessment:

- Ceiling voids
- Wall voids
- Below floors
- Behind ceramic wall tiles
- Beneath floor coverings
- Subfloor spaces
- Risers
- Formwork to concrete slabs

3. Recommendations

The following recommendations are provided with respect to hazmat identified during the assessment of the site. This assessment only covers the parts of the site that have been accessed and been assessed in accordance with the approved scope.

3.1. Asbestos Containing Materials

- A destructive hazardous building material survey must be carried out prior to any demolition or refurbishment works. All asbestos and hazardous materials identified and likely to be disturbed by those works should be removed in accordance with the legislative requirements and relevant codes of practice or compliance codes.
- During future demolition works, if any materials that are not referenced in this report and are suspected of containing asbestos are encountered, then works must cease and an asbestos hygienist should be notified to determine whether the material contains asbestos

The recommendations, conclusions or stability of asbestos materials contained in this report shall not abrogate a person of their responsibility to work in accordance with statutory requirements, codes of practice, guidelines, material safety data sheets, work instructions or reasonable work practices.

3.2. Synthetic Mineral Fibres

- SMF materials that are likely to be disturbed during any proposed demolition/refurbishment works should be handled in accordance with The National Code of Practice for the Safe Use of Synthetic Mineral Fibres [NOHSC:2006(1990)].

3.3. Training

Information, instruction and training must be provided to workers, contractors and others who may come into contact with hazardous materials in a workplace, either directly or indirectly.

Depending on the circumstances this hazardous materials awareness training may include:

- The purpose of the training;
- The health risks of hazardous materials;
- The types, uses and likely occurrence of hazardous materials on site, in plant and/or equipment in the workplace;
- The trainee's roles and responsibilities for hazmat management;
- Where the asbestos and hazardous materials register is located and how it can be accessed;
- The timetable for removal of hazmat from the workplace;
- The processes and procedures to be followed to prevent exposure, including exposure from any accidental release of hazmat into the workplace;
- Where applicable, the correct use of maintenance and control measures, protective equipment and work methods to minimise the risks from hazmat, limit the exposure of workers and limit the spread of hazmat outside any work area;
- The National Exposure Standard (NES) and control levels for hazmat; and
- The purpose of any air monitoring or health surveillance that may occur.

Should any further suspect asbestos and/or hazmat become evident during future disturbance/ refurbishment works which have not been addressed in this report, Tetra Tech should be contacted immediately so that a WHS consultant can confirm the status of the suspect material/s.

Tetra Tech is able to assist with all aspects of Risk Management for removal of asbestos and other hazardous materials resulting from these findings.

Appendix A: Asbestos and Hazardous Materials Register

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Area	Location	Material Description	Hazard	Reference No.	Result	Friable	Quantity	Condition	Risk Rating	Reinspect Date	Recommendations	Line ID
Internal	GL / Northern Fire Pump Room / Pump Exhausts	Insulation Material	SMF	754-SYDEN364426 Hoxton Park Distribution Centre339S5	Suspected SMF	-	5 m	-	Very Low	-	Maintain in current condition if to remain in-situ. Remove under controlled SMF conditions as per the Code of Practice for the Safe Use of Synthetic Mineral Fibres [NOHSC: 2006 (1990)].	1
Internal	GL / Northern Fire Pump Room / Underside of Ceiling	Sarking Insulation	SMF	754-SYDEN364426 Hoxton Park Distribution Centre339S4	Suspected SMF	-	60 m²	-	Very Low	-	Maintain in current condition if to remain in-situ. Remove under controlled SMF conditions as per the Code of Practice for the Safe Use of Synthetic Mineral Fibres [NOHSC: 2006 (1990)].	2
Internal	GL / Southern Fire Pump Room / Pump Exhausts	Insulation Material	SMF	754-SYDEN364426 Hoxton Park Distribution Centre339S2	Suspected SMF	-	5 m	-	Very Low	-	Maintain in current condition if to remain in-situ. Remove under controlled SMF conditions as per the Code of Practice for the Safe Use of Synthetic Mineral Fibres [NOHSC: 2006 (1990)].	3
Internal	GL / Southern Fire Pump Room / Underside of Ceiling	Sarking Insulation	SMF	754-SYDEN364426 Hoxton Park Distribution Centre339S1	Suspected SMF	-	80 m²	-	Very Low	-	Maintain in current condition if to remain in-situ. Remove under controlled SMF conditions as per the Code of Practice for the Safe Use of Synthetic Mineral Fibres [NOHSC: 2006 (1990)].	4

Area	Location	Material Description	Hazard	Reference No.	Result	Friable	Quantity	Condition	Risk Rating	Reinspect Date	Recommendations	Line ID
Internal	GL / Sprinkler Valve Rooms / Underside of Ceiling	Sarking Insulation	SMF	754-SYDEN364426 Hoxton Park Distribution Centre339S3	Suspected SMF	-	250 m²	-	Very Low	-	Maintain in current condition if to remain in-situ. Remove under controlled SMF conditions as per the Code of Practice for the Safe Use of Synthetic Mineral Fibres [NOHSC: 2006 (1990)].	5
External	GL / Northern Building / Perimeter, Various Areas	R134a Hydrofluorocarbon (HFC)	ODS	754-SYDEN364426 Hoxton Park Distribution Centre339O1	Non ODS Refrigerant	-	20 Units	-	-	-	Hydrofluorocarbon (HFC) non ozone depleting substances.	6

Appendix B: Photographs

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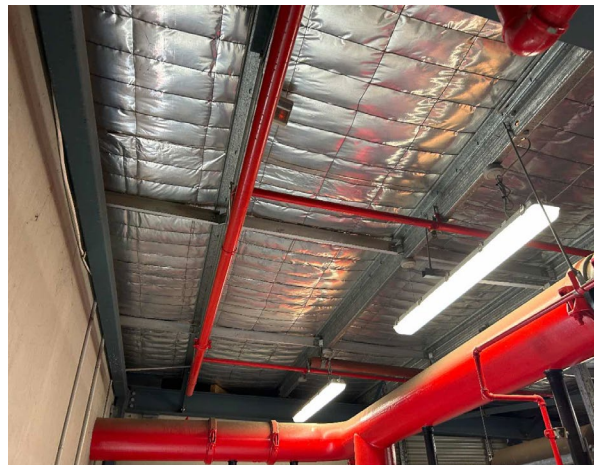
Line ID 1: Internal, GL, Northern Fire Pump Room,
Pump Exhausts, Insulation Material - Suspected SMF



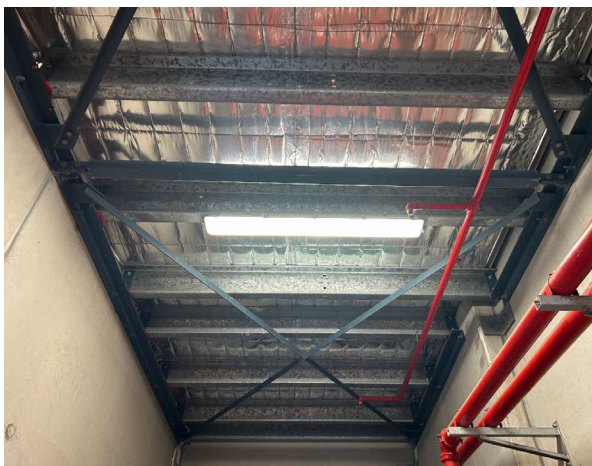
Line ID 2: Internal, GL, Northern Fire Pump Room,
Underside of Ceiling, Sarking Insulation - Suspected SMF



Line ID 3: Internal, GL, Southern Fire Pump Room,
Pump Exhausts, Insulation Material - Suspected SMF



Line ID 4: Internal, GL, Southern Fire Pump Room,
Underside of Ceiling, Sarking Insulation - Suspected SMF



Line ID 5: Internal, GL, Sprinkler Valve Rooms,
Underside of Ceiling, Sarking Insulation - Suspected
SMF



Line ID 6: External, GL, Northern Building, Perimeter,
Various Areas, R134a Hydrofluorocarbon (HFC) - Non ODS
Refrigerant

Appendix C: Risk Assessment

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Risk Assessment

The risk assessment is explained, in the tables below. Our semi-quantitative risk assessment borrows elements from the materials risk assessment documented in HSG264: Asbestos: The survey guide – HSE and the priority risk assessment documented in HSG 227: A comprehensive guide to Managing Asbestos in premises – HSE, providing an element of quantification to the qualitative nature of site risk assessment.

Some of the elements of these well documented risk assessments have been omitted. Most notably the asbestos type from the materials risk assessment, as all types of asbestos are listed by the International Agency for Research on Cancer (IARC) as Type 1 Carcinogens. In addition, we have omitted the maintenance activity from HSG 277. The reason being that human risk factors associated with maintenance activities are often difficult to assess in-situ and require detailed input from the Person in Control of a Business of Undertaking (PCBU).

The risk assessment then takes into account all other Hazardous materials and utilizes similar algorithms to create a risk assessment for those materials.

The asbestos containing material risk score is a quantitative assessment determined by the sum of the scores based on the material assessment and the likelihood of exposure, i.e. Risk score = Material Score + Location Score (out of as possible 18).

An explanation of the material assessment and likelihood of exposure scores can be found in the tables below.

Table 2 - Risk Scores

Overall Risk Assessment Score	Overall Risk Rating
0 – 4	Very Low
5 – 8	Low
9 – 13	Moderate
14 – 18	High

Table 3 – Product Type (or debris)

Examples of Materials – Asbestos	Examples of Materials - Hazmat	Score
Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi-rigid paints or decorative finishes, asbestos cement etc.)	SMF composite products / insulation batts / woven products, Lead paint, Lead Compounds/Alloys/Products, Small PCB containing electrical capacitors	1
Asbestos insulating board, mill boards, other low-density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt	RCF woven/treated products, Lead paint flakes, Industrial PCB containing industrial transformers	2
Thermal insulation (e.g. pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing	RCF loose fill products, Lead dust, PCB containing oils in bulk storage, or uncontained spills.	3

Table 4 – Extent of Damage or Deterioration

Examples of Materials – Asbestos	Examples of Materials - Hazmat	Score
Good condition: no visible damage	Good condition: no visible damage	0
Low damage: a few scratches or surface marks; broken edges on boards, tiles etc.	Low damage: a few scratches or surface marks; Peeling paint, Large paint flakes, Redundant PCB container in accessible area out of electrical product	1
Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres	Medium damage: significant breakage of materials or several small areas where material has been damaged, good condition sprays and insulation, large amounts of fine flaking paint and debris, Leaking PCB containing electrical equipment	2
High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris	High damage or delamination of materials. Visible debris, Lead dust, Pooling PCB oils, leaking oil bulk containers	3

Table 5 – Surface type and treatment

Examples of Materials – Asbestos	Examples of Materials - Hazmat	Score
Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles	SMF/RCF composite products, insulation products sealed behind a non-friable barrier, Lead paints <0.1%w/w, lead, compounds/ alloys/ products <0.1%w/w lead, PCB oils <2mg/kg	0
Enclosed sprays and lagging, asbestos insulating board (with exposed face painted or encapsulated), asbestos cement sheets etc.	SMF/RCF woven and insulation products, Lead paints ≥0.1%w/w and <0.25%w/w, PCB ≥2mg/kg and <50mg/kg in oil	1
Unsealed asbestos insulating board, or encapsulated lagging and sprays	SMF/RCF heat-treated insulation products, Lead paints ≥0.25%w/w and <1.0%w/w, Lead dusts above recommended clearance indicator based on AS/NZS4361.2. PCB ≥50mg/kg and <10,000mg/kg in oil	2
Unsealed laggings and sprayed asbestos	Lead dusts a multiple of at least 5 times above recommended clearance indicator based on AS/NZS4361.2, Lead paint >1.0%, ≥10,000mg/kg in oil (10%w/w)	3

² Lead and PCB refers specifically to the analysis result

Appendix D: Legislative Requirements

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Legislative Requirements

The assessment, and preparation of this report have been undertaken in accordance with the requirements of State/Territories legislation and standards outlined below.

State/Territories Relevant Legislation

States & Territories	Acts	Legislation
Australian Capital Territory (ACT)	ACT Work Health & Safety Act 2011	ACT Work Health & Safety Regulation 2011
New South Wales (NSW)	NSW Work Health & Safety Act 2011	NSW Work Health & Safety Regulation 2017
Northern Territory (NT)	NT Work Health & Safety Act 2011	NT Work Health & Safety Regulation 2017
Queensland (QLD)	QLD Work Health & Safety Act 2011	QLD Work Health & Safety Regulation 2011
South Australia (SA)	SA Work Health & Safety Act 2012	SA Work Health & Safety Regulation 2012
Tasmania (TAS)	Tasmanian Work Health & Safety Act 2012	Tasmanian Work Health & Safety Regulation 2012
Victoria (VIC)	Victorian Occupational Health and Safety Act 2004	Victorian Occupational Health and Safety Regulation 2017
Western Australia (WA)	Occupational Safety and Health Act 1984	Occupational Safety and Health Regulation 1996

States/Territories Code of Practices & Compliance Codes

States & Territories	Codes of Practices & Compliance Codes	
Australian Capital Territory (ACT)	Code of Practice: How to Manage and Control Asbestos in the Workplace.	Code of Practice: How to Safely Remove Asbestos.
New South Wales (NSW)	Code of Practice: How to Manage and Control Asbestos in the Workplace.	Code of Practice: How to Safely Remove Asbestos.
Northern Territory (NT)	Code of Practice: How to Manage and Control Asbestos in the Workplace.	Code of Practice: How to Safely Remove Asbestos.
Queensland (QLD)	Code of Practice: How to Manage and Control Asbestos in the Workplace.	Code of Practice: How to Safely Remove Asbestos.
South Australia (SA)	Code of Practice: How to manage and Control asbestos in the Workplace.	Code of Practice: How to Safely Remove Asbestos.
Tasmania (TAS)	Code of Practice: How to Manage and Control Asbestos in the Workplace.	Code of Practice: How to Safely Remove Asbestos.
Victoria (VIC)	Compliance Code: Managing Asbestos in Workplaces.	Compliance Code: Removing Asbestos in Workplaces.

Western Australia (WA)	Code of Practice for Management and Control of Asbestos in Workplaces [NOHSC:2018(2005)].	Code of Practice for the Safe Removal of Asbestos [NOHSC:2002(2005)]
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The Victorian Compliance Codes align with the intent of the SafeWork Australia Model Code of Practice

Hazardous Materials Standard & Guidance Notes

Hazardous Material	Guidance Notes
Lead Based Paint	AS/NZS 4361.2:2017 Guide to hazardous paint management – Part 2: Lead paint in residential, public and commercial buildings
Lead Containing Dust	National Environmental Protection Measure (NEPM) (NEPC, 1999) as updated in 2013.
Synthetic Mineral Fibres	National Occupational Health and Safety Commission (1990) Synthetic Mineral Fibres; National Standard for Synthetic Mineral Fibres; and the National Code of Practice for the Safe Use of Synthetic Mineral Fibres
Polychlorinated Biphenyls	ANZECC (1997) Identification of PCB-containing Capacitors: An Information Booklet for Electricians and Electrical Contractors
Ozone Depleting Substances	UNEP (2001) Inventory of Trade Names of Chemical Products containing Ozone Depleting Substances and their Alternatives

Each section is to be read in conjunction with the whole of this report, including the appendices.

Appendix E: Methodology

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Methodology

Hazmat surveys are undertaken considering a risk management approach, in accordance with relevant statutory regulations and relevant Codes of Practice. A risk assessment was conducted based on a number of factors associated with hazmat identified during the survey and prioritised through Risk and Action Classifications.

The assessment involved the onsite investigation for the presence of ACM, LBP systems, LCD, SMF, PCB and ODS including chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and hydrofluorocarbons (HFCs). Information was collected from the site owners/occupiers/tenants where available on relevant issues pertaining to the site. Based on the available data and the status at the time of inspection, where items were identified, visual and/or analytical characterisation (where required) was performed and reported in **Appendix A: Asbestos and Hazardous Materials Register**.

The assessment was conducted on the basis of the condition, type and location of the materials at the time of inspection. The scope of this investigation did not allow intrusive sampling techniques to be undertaken in all locations, and consequently the register may have limitations as a reference document for the purposes of renovation or demolition.

Only 'typical' suspected material occurrences are inspected and sampled. Sampling is undertaken on a representative basis, for example, the inspection of one fire door of the same type within the same area is undertaken (i.e. not every 'matching' fire door is examined), unless specifically instructed. Sample collection was performed in a non-destructive and non-invasive manner by competent persons. Presumptions, based on knowledge and experience, that inaccessible areas contain asbestos materials may also be made and stated within the register.

Samples collected are representative of the material sampled, individually identified, transported, analysed and reported in accordance with relevant Statutory Regulations, Codes of Practice and Tetra Tech's Work Instructions. Laboratories undertaking analysis are appropriately NATA certified for the analysis conducted. LCD thresholds are adopted from lead in soil thresholds found in the National Environment Protection Assessment of Site Contamination (ASC) Measure (1999) as amended in 2013 (NEPM).

The presence of asbestos in bulk samples is determined by Polarised Light Microscopy (PLM) with dispersion staining techniques. Where asbestos was found to exist, a risk assessment was conducted on each item and a priority rating applied. This was conducted in accordance with the protocols described in **Appendix D: Risk Assessment**.

The asbestos and hazmat register is made up of relevant information gathered on site plus Tetra Tech's assessment of risk and assignment of action ratings. Reference to photographs, where available, is made in the register along with sample identification and analysis results, where applicable. Sample analysis results from previous assessments may be utilised and referenced in this register.

Appendix F: Statement of Limitations

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Statement of Limitations

The survey inspection conducted was not a destructive pre demolition/ refurbishment survey. A destructive hazardous building material survey must be carried out prior to any demolition or refurbishment works.

Tetra Tech has conducted work concerning the environmental status of the property which is the subject of this report and has prepared this report on the basis of that assessment.

The work was conducted, and the report has been prepared, in response to specific instructions from the client to whom this report is addressed, within the time and budgetary requirements of the client, and in reliance on certain data and information made available to Tetra Tech. The analyses, evaluations, opinions and conclusions presented in this report are based on those instructions, requirements, data or information, and they could change if such instructions etc. are in fact inaccurate or incomplete.

Investigations have been based on inspections conducted in accordance with relevant guidelines and standards, and normal industry practice, having regard to the client's instruction, and interpretations of conditions are based on the data from those inspections and, where relevant and conducted, testing. To the best of our knowledge, they represent a reasonable interpretation of the condition of the site as able to be inspected.

This report has been provided by Tetra Tech for the sole use of the client and only for the purpose for which it was prepared. Any representation contained in the report is made only for the client.

No inspection can be guaranteed to locate all asbestos in a specific location. The assessment cannot be regarded as absolute, without extensive invasion of structures. Future demolition and or renovation to site structures may expose situations, which were concealed or otherwise impractical to access during this assessment.

The assessment brief is to identify every reasonably accessible hazmat. Reasonably accessible does not extend to searching for concealed hazmat beneath concrete encased structural beams or beneath concrete floors, behind another hazmat, or any other locations which, to access, would cause structural damage that could potentially destabilise the structure or the building. Given the way in which hazmat was used in the construction of buildings, some may only be detected during the course of subsequent demolition.

Any areas within the remit of the assessment but not described within the body of the report or in the hazmat register should be regarded by the client as un-assessed, and suspected as ACM potentially containing amphibole asbestos. A competent person should assess such areas before any work affecting them is carried out.

It must be assumed that materials visually assessed as presumed asbestos contain amphibole asbestos, unless sampled and analysed to prove otherwise. All areas where access was not possible must also be presumed to contain asbestos until proven otherwise.

Asbestos Containing Materials

Tetra Tech assessors take samples at any situations known, or suspected, to contain Asbestos. Where the analysis determines that No Asbestos is Detected (NAD) the samples are listed in the report to provide information for potential future assessments.

Representative sampling is defined as one like sample per consistent material type, situation or item. In these instances, only one test sample will be collected for analytical confirmation and the results expressed as consistent and typical of the building. It is advisable to presume that materials similar to those positively identified as asbestos also contain asbestos until proved otherwise. It should not be presumed that materials similar in appearance to those tested and found not to contain asbestos also do not contain asbestos.

Due to the very low concentration of asbestos fibres and the non-homogenous matrix of vinyl floor tiles, false negative results may be obtained. Therefore, the accuracy of all results cannot be guaranteed.

Notably, with some asbestos-containing bulk material it can be very difficult, or impossible to detect the presence of asbestos using the polarised light microscopy analytical method, even after ashing or disintegration of samples. This is due to the low grade or small length or diameter of asbestos fibres present in the material, or attributed to the fact that, very fine fibres have been distributed individually throughout the materials.

The analysis of many asbestos products used as a component of insulation materials, may be compromised in instances where the material has been heat affected, as heat may alter the morphology of the fibrous material.

Internal building materials should be assumed to contain asbestos until otherwise assessed.

Subsurface drains and pipes may be constructed of asbestos cement, but this could not be assessed. Any subsurface pipes, particularly those constructed of fibre-cement or concrete, should be assumed to contain asbestos until otherwise assessed.

It is also noted that sub-surface conditions can change with time, and the report is based on data that was gathered at the time of the report. Tetra Tech will not update the report and has not taken into account events occurring after the time the assessment was conducted.

The following limitations and restrictions to specific materials, installations and locations are commonly found during assessments of this nature, even if safe access can be provided through consultation with the client this inspection and report may not include the following areas:

- **Risers / Ceiling, Floor or Wall Cavities, and Voids** - may be completely blocked or bricked in. Occasionally may only be detected if shown on building construction plans or during demolition
- **Columns / Structural Elements** - these will not be penetrated if doing so will damage the stability of the building
- **Roofs / External Areas** - these will not be checked if safe access cannot be achieved
- **Confined Spaces** - these will not be checked if safe access cannot be achieved
- **Restricted Access** - areas subject to restricted access will not be checked unless special arrangements have been made through the client within the remit of the assessment
- **Live Plant or Electrical Installations** - live electrical installations including fuse boxes, electrical control cabinets, distribution panels etc. are not routinely checked for safety reasons. Electrical equipment will only be examined if it is locked off and an isolation certificate has been issued. Under exceptional circumstances, when arranged by the client, examination of non-isolated equipment may take place under the supervision of an electrician
- **Live Refrigerators / Cold Rooms / Mechanical Equipment / Heater Units / Kilns** - may contain asbestos internally, which is not visible or accessible until the unit is isolated and dismantled

The Client must not rely on an inspection or report as indicating that a site or a building is “asbestos free”. All that the report can be relied upon to show is that no asbestos was found (or that only such asbestos was found as was reported to be found) in the course of the inspection. The findings of the report must be considered together with the specific scope and limitations of the type of inspection undertaken.

This report does not comment on, or present information regarding regulatory waste disposal practices and the associated waste disposal legislative requirements for hazardous materials. Prior to the disposal of any hazardous materials from site, clarification from the EPA should be sought by you, the client or the controller of the site (PCBU).

As part of the site inspection, materials may be suspected to be non-hazardous based on age and/or appearance. If any of these materials are damaged or likely to be disturbed, due to (but not limited to) maintenance activities or building inspections, a risk assessment and sampling of this material, with analytical confirmation should be undertaken in conjunction with the processes outlined in the Asbestos Management Plan (AMP) for the site.

Materials including (but not limited to) e.g. fire retardants, vermiculite, sprayed coatings and insulations cannot be feasibly sampled in their entirety due to the heterogeneous nature of such materials. Sample results provided are only representative of the material sampled, and in that particular sample location.

If any such materials are damaged or likely to be disturbed, due to (but not limited to) maintenance activities or building inspections, a risk assessment and targeted area sampling, with analytical confirmation should be undertake in conjunction with the processes outlined in the Asbestos Management Plan (AMP) for the site.

Should any other material suspected to contain asbestos or hazmat be found at the site, then works should cease and a suitably trained asbestos hygienist should be engaged to sample or assess the material.