Asbestos Management Plan

AMP Capital



Bourke Place 600 Bourke Street, Melbourne VIC

October 2019



Asbestos Management Plan

| Report For: AMP Capital | |
|---|---|
| Address: 600 Bourke Street, Melbourne VIC | |
| Prepared By: | Matthew Hyde, Senior Consultant (RiskTech Compliance) |

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1. Introduction

This document is designed to assist the owners and managing agents/tenants of 600 Bourke Street, Melbourne VIC in fulfilling their general obligation to ensure the health and safety of employees, contractors, visitors and others accessing the site. This document has been specifically developed to assist in the management of asbestos & hazardous materials that are present/assumed to be present at the site.

1.1 What is Asbestos?

Asbestos is a natural mineral found throughout Australia and the world. There are three main types of asbestos used commercially in Australia - Chrysotile (white asbestos), Amosite (brown asbestos) and Crocidolite (blue asbestos).

Asbestos minerals have separable long fibres that are strong and flexible enough to be spun and woven and are heat resistant. Because of these characteristics, asbestos has been historically used in over 3,000 manufactured goods, mostly in building materials, friction products, heat-resistant fabrics, gaskets, and coatings.

These building products were used extensively in Australia up until the late 1980's and continued to be used in some products until 2003, when its use was fully banned in Australia.

2. Why manage Asbestos?

2.1 Health Risks

Asbestos is a known carcinogen that affects the lungs, and breathing in high levels of asbestos fibres over time can lead to a number of diseases and cancers. This document aids in ensuring that asbestos-containing materials (ACMs) are managed in such a way that they do not become damaged and increase the risk of exposure.

2.2 Legislative Requirements

The following legislation and industry standard documentation applies to the management of asbestos in VIC:

- VIC Occupational Health and Safety Act 2004;
- VIC Occupational Health and Safety Regulations 2017;
- VIC Compliance Code: Managing Asbestos in Workplaces, 2018;
- VIC Compliance Code: Removing Asbestos in Workplaces, 2018.

3. Asbestos Materials Register

The Asbestos Materials Register details the location, description, status, condition, risk and control recommendations of ACM at the property located at 600 Bourke Street, Melbourne VIC at the time of the inspection.

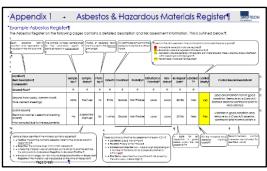
3.1 Asbestos Register - How to use:

Review the asbestos materials register to confirm where asbestos items have been identified and their current condition. A control recommendation will be made for each ACM.

This page, immediately prior to the Register details how to use the report (see right).

This register must be made available to all contractors, visitors and trades people that visit the site to conduct work BEFORE they start any works.

Refer to RiskTech Compliance Asbestos Survey for the site (Ref: AMP Hazmat 600 Bourke St, Melbourne VIC Oct19).



4. Requirements

The following tasks **<u>MUST</u>** be undertaken to <u>meet legislative requirements</u> for asbestos management:

4.1 Site Controllers/Management Plan Controller

- Keep a current copy of the Asbestos Register on site.
- Ensure all contractors working at the site have read the site's Asbestos Register.
- Re-inspect all identified asbestos items to determine if condition status has changed (Minimum every 5 years or when materials have been removed/disturbed).
- Maintain ACMs as per the control recommendations shown on the register.
- Carry out an asbestos refurbishment / demolition risk assessment if refurbishment or demolition works are planned.
- Inform occupants when asbestos removal works occur.
- Engage an appropriately licensed asbestos contractor to conduct asbestos removal works prior to renovations that may impact on the material.

4.1.1 Labelling

Confirmed/suspected ACMs should be labelled to warn people not to damage the material (It is noted some asbestos materials have been labelled on site).



4.1.2 Priority Remediation Works

- Review the recommendations provided against each item in the Asbestos Register.
 - Items with a <u>P1</u> or <u>P2</u> Priority Action Rating require attention within the next <u>3-6</u> <u>months</u>. Any works on these items should be conducted by a Licensed Asbestos Removal Contractor (refer to Section 9 for further details).
 - Items with a P3 or P4 Priority Action Rating need to be maintained in good condition.

It is noted that at the time of preparing this Management Plan there were no P1 or P2 items present at 600 Bourke Street, Melbourne VIC

4.1.3 Record Keeping

Maintain records of any maintenance or service work conducted on asbestos materials, including any clearance certificates for removed items.

4.1.4 Training

Site personnel that may come into contact with ACM should be provided with Asbestos Awareness training to inform them how to work safely alongside asbestos materials by instructing them of the health risks associated with asbestos, their roles and responsibilities and procedures to minimise the risks from asbestos.

4.2 Site Occupants

- Site Occupants <u>must</u> notify the Site Controller/Management Plan Controller of any proposed refurbishment, demolition or maintenance works that are likely to involve the disturbance or removal of confirmed/suspected ACM.
- Site Occupants <u>must</u> notify the Site Controller/Management Plan Controller if ACMs are in poor condition or if there are suspected ACMs encountered not identified in the register.

4.3 Site Contractors

- Contractors must read and understand the Asbestos Register and Asbestos Management Plan prior to undertaking works on site.
- Contractors <u>must</u> supply a Safe Work Method Statement (SWMS) prior to conducting any maintenance works on/near ACMs.
- Contractors <u>must</u> ensure proper safety procedures are followed and works are conducted in accordance with all relevant legislative requirements and best industry practice.
- Contractors <u>must</u> notify the Site Controller/Management Plan Controller if ACMs are in poor condition or if there are suspected asbestos materials encountered not identified in the register.

5. Managing ACMs identified on site

A range of measures are available for the control of asbestos risks. The selection of the appropriate control measures are based on the assessed risk for each specific location (noted in the asbestos register).

These measures include:

- Leave and maintain in existing condition.
- Repair and maintain in good condition.
- Encapsulation using adhesive, mastic or providing a barrier such as a box enclosure or steel cladding.
- Removal by approved methods under controlled conditions.
- Labelling of asbestos materials that are to remain in situ to ensure that the materials are not damaged inadvertently by maintenance contractors etc.

6. Refurbishment / Demolition Works

6.1 General

The existing Asbestos Register is designed to satisfy legislative requirements for workplaces and is <u>not</u> suitable to be used for demolition or refurbishment purposes. Asbestos materials, which may be concealed within inaccessible areas/voids may not have been located during previous non-invasive investigations.

As per Division 6, Regulation 241 of the VIC Occupational Health and Safety Regulations 2017, if demolition or refurbishment works are likely to take place, a more intrusive / Destructive Survey is required in accordance with the requirements of Australian Standard AS 2601: The Demolition of Structures.

6.2 Asbestos Removal Works

If asbestos materials are likely to be disturbed or require removal as part of demolition or refurbishment works, removal works must be conducted in accordance with the *Compliance Code: Removing Asbestos in Workplaces, 2018.*

6.2.1 Licensed Asbestos Removal Contractor (LARC)

There are specific laws that require asbestos materials to be removed or remediated by an appropriately Licensed Asbestos Removal Contractor:

- Friable asbestos material work <u>must</u> be undertaken by Contractors that hold a Class A asbestos removal license. Asbestos air monitoring must be undertaken during the removal of friable asbestos when the works are undertaken indoors and outdoors, when a risk is posed to other persons.
- Non-friable asbestos removal work <u>must</u> be undertaken by Contractors that hold a Class A or B asbestos removal licence where the ACM to be removed exceeds 10m² in total or the total time over which asbestos removal work is performed exceeds 1 hour in a 7-day period. Asbestos air monitoring is not required for non-friable asbestos material work, however the person who commissioned the removal works may decide that it is appropriate to do so.

The asbestos removal contractor must prepare an Asbestos Control Plan, detailing the proposed work methodologies to be used to safely and effectively remove, enclose or encapsulate the ACMs. WorkSafe Victoria must be notified of planned asbestos removal works:

- At least 24 hours prior to commencing asbestos removal works for removal of 10m² or less of non-friable asbestos;
- Within 24 hours of commencing asbestos removal works if removal works has arisen due to an unexpected situation (as per regulation 299 of the VIC Occupational Health and Safety Regulations 2017);

At least 5 days prior to commencing asbestos removal work in all other cases (friable asbestos and non-friable asbestos greater than 10m²).

6.3 Visual Clearance Inspections

An independent consultant must inspect the removal/remedial works and issue a Clearance Certificate for each work area for all asbestos removal works greater than 10m². This verifies that the works have been undertaken safely and completely.

6.4 Asbestos Fibre Air Monitoring

Asbestos fibre air monitoring must be conducted during all indoor works involving friable asbestos materials and all outdoor works where there is a potential risk to other persons. Asbestos air monitoring must be conducted within the enclosed removal area subsequent to friable asbestos removal works.

The Person who commissioned the asbestos removal works must consider providing asbestos fibre air monitoring during the removal of, or work on, non-friable asbestos products in public or sensitive locations. The requirements for air monitoring must be established prior to commencement of works.

All asbestos fibre air monitoring must be conducted in accordance with the Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres [NOHSC: 3003 (2005)] and analysed by a NATA accredited laboratory.

7. Types of Asbestos Material

ACM can be classified into two main groups, <u>Friable</u> and <u>Non-Friable</u>.

<u>Friable ACM</u> are materials that can be crumbled, pulverised or reduced to powder by hand pressure when dry. These materials are considered higher risk as they are more readily damaged, thereby possibly releasing airborne fibres.

The following <u>Friable</u> ACMs were identified/suspected on site:

| Type of Friable Material | Location |
|--------------------------|---|
| Gasket | Level 51, Boiler Room, Boiler – Boiler Inlet Manifold |

<u>Non-friable ACM</u> are often referred to as 'bonded', where asbestos is bound in a matrix such as Portland cement (e.g. fibre cement sheeting) or various resin/binders (e.g. Mastic). These materials are considered lower risk, unless they are in a damaged state or are mechanically abraded such as in drilling or grinding the material.

The following Non-friable ACM were identified/suspected to be present on site:

| Type of Non-friable Material | Location |
|------------------------------|---|
| | Level 53, Large Diesel Fire Pump – Vent Pipe & Manifold |
| Gaskets | Level 52 Generator Room – Generator Pipework |
| | Level B3 – Large Diesel Fire Pump – Vent Pipe |

Suspected materials should be confirmed prior to works that may impact on them.

Further information on asbestos materials identified on site are outlined on the following pages.

7.1 Non-Friable Materials

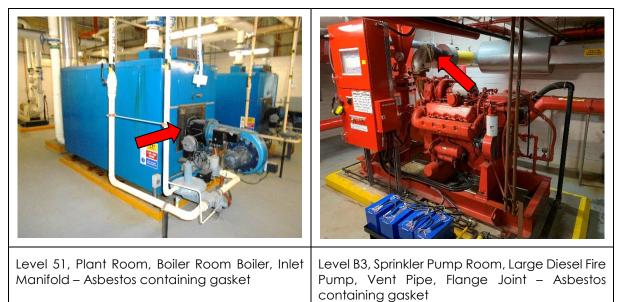
7.1.1 Asbestos Gaskets

Asbestos was a common constituent used to make gaskets for commercial and industrial settings. Asbestos fibres were mixed with a binding material and compressed to form a sheet, which was then cut into various shapes and sizes to form gaskets and heat seals.

Asbestos gaskets were commonly used on pipes and boilers and in between joints in ships, vehicles, planes and operating plant. When used in between pipe joints as a gasket the contents of the pipe are prevented from leaking out. Asbestos was commonly used as a component of this product because it provided resistance to high temperatures, as well as durability and flexibility.

Gaskets were one of the last materials in Australia that used asbestos as a constituent. Buildings constructed up until 2004 may contain asbestos gaskets in plant such as compressors, boilers and valves. Imported equipment after this date may still contain asbestos in gaskets, as shown by some cars being imported from China in recent years.

Gaskets are generally considered a non-friable product, however they can degrade over time or be affected by heat/corrosion and become more friable.



See below photographs of the asbestos gaskets identified on site:

These materials should be replaced with non-asbestos alternatives during regular maintenance if they would be impacted upon. In most cases it is considered safe to leave them in-situ and remove them when decommissioning the item of plant.

8. Emergency Procedure -Accidental Asbestos Disturbance

As there are some asbestos containing materials on site, from time to time there may be disturbances of these materials. Typically disturbances occur by:

- <u>Maintenance activities</u> eg replacing duct work with asbestos mastic, drilling holes through asbestos cored fire doors
- Accidental disturbances eg reversing trucks into an awning or wall, forklifts moving product damages a wall
- Natural causes eg hailstorm damaging asbestos cement roof, falling tree onto a gutter, heavy rains dislodging buried asbestos cement fragments or general degradation of installed asbestos.

Based on an assessment of 600 Bourke Street, Melbourne VIC the most likely disturbance scenarios are likely to be:

Maintenance on plant & equipment with asbestos gaskets.

For all issues with regards to damaged/suspected asbestos materials on site, please call the Senior Facility Manager for the site, Darren Hynes.

Darren Hynes Contact Details Mob: 0411 621 154



The site Facility Manager has the contacts and experience to arrange testing of suspect materials, temporary isolation of materials and organise asbestos removals/clean-ups as required.

The procedure for dealing with accidental disturbance of asbestos materials is outlined on the following page.

600 Bourke Street, Melbourne VIC

In the event that an activity causes the accidental disturbance of asbestos materials (i.e. an unplanned disturbance), the following steps should be carried out:

| | Step | Who | Steps/Notes |
|---|------|---|--|
| Potential asbestos product is disturbed | 1 | Site Controller/ Management Plan Controller | Remove personnel from areas considered to be at risk in relation to asbestos exposure. Go to Step 2 |
| Remove personnel from area | 2 | Site Controller/ Management Plan Controller | Access to the area should be controlled and sign posted to prevent unauthorised persons entering the affected area. Inform appropriate personnel. Go to Step 3 |
| Restrict access to area & Inform staff | 3 | Site Controller/ Management Plan Controller | Any air conditioning systems should be shut-off / temporarily modified to prevent the distribution of fibres from the area to other areas in the building (if relevant). Go to Step 4 |
| Shut down air conditioning system | 4 | Site Controller/ Management Plan Controller, | Contact an <u>Asbestos Consultant</u> to confirm the presence of ACMs and to advise on appropriate control strategies. |
| | | Asbestos Consultant & Licensed Asbestos Clean up works. | |
| Contact Asbestos Consultant & Licensed | | Removal Contractor | - Friable ACM – Class A contractor required |
| Asbestos Removal Contractor | | | - Non Friable ACM – Class A/B contractor required |
| | | | Go to Step 5 |
| Clean up area | 5 | Asbestos Consultant | Asbestos fibre air monitoring may be required outside the area of the asbestos contamination whilst clean-up works are |
| Conduct Asbestos Fibre Air Monitoring | | | being conducted to monitor airborne asbestos fibre concentrations (where applicable). Go to Step 6 |
| | 6 | Asbestos Consultant & | Clearance inspection undertaken by asbestos consultant to verify removal works |
| Conduct Clearance Inspection & Clearance Air Monitoring | | Site Controller/ Management Plan Controller | have been completed to standard. Only when air monitoring results are <0.01 fibres/ml and a clearance certificate has been issued, shall personnel be allowed to reoccupy the affected area. |

9. Action Plan

Based upon the results of the Asbestos Survey and Risk Assessment, the following is a summarised Work / Action Plan for managing the ACM on site.

| High Priority Action Required | Material | Condition | Due for Completion | Date Complete |
|-------------------------------|----------|-----------|--------------------|------------------|
| Nil | | | | |

| Medium Priority Action Required | Material | Condition | Due for Completion | Date Complete |
|---------------------------------|----------|-----------|--------------------|------------------|
| Nil | | | | |

| Low Priority Action Required | Material | Condition | Due for Completion | Date Complete |
|--|-----------|-----------|-------------------------------------|------------------|
| Install warning label on ACM | All ACM | - | October 2020 | |
| Re-Inspection of ACM & Hazardous Materials | All ACM | - | October 2024 or prior refurbishment | |
| Update Asbestos & Hazardous Materials Register | All ACM | - | October 2024 or prior refurbishment | |
| Update Asbestos & Hazardous Materials Management Plan | All ACM | - | October 2024 or prior refurbishment | |
| Undertake Destructive Survey | All Areas | - | Prior refurbishment /demolition | |

10. Useful Contacts

| Contact Name | Role | Contact Details |
|---|----------------------------|---|
| WorkSafe Victoria | Regulators | 222 Exhibition Street Melbourne VIC 3000 Ph: 13 23 60 <u>info@worksafe.vic.gov.au</u> |
| City of Melbourne | Local Consent Authority | Melbourne Town Hall Administration Building 120 Swanston Street, Melbourne VIC 3000 Ph: 03 9658 9658 www.melbourne.vic.gov.au/ |
| RiskTech Compliance Attn: Matthew Hyde (Senior Consultant); | Asbestos Consultants | Suite 22, Level 1, 431 St Kilda Road, Melbourne VIC 3004 Ph: 03 9815 6600; M 0481 117 987 <u>www.RiskTech.com.au</u> |

10.1 List of Asbestos Removal Contractors

A selection of Class A contractors are listed below – these companies can remove friable and non-friable asbestos. They are listed in alphabetical order.

| Contractor | Contact | Contact Details |
|---------------------------------------|--------------------|---|
| A Plus Building Solutions | Ph: (03) 9545 6200 | 27-31 Coora Road Oakleigh South VIC 3167 www.aplusbs.com.au/ |
| McMahon Services Australia Pty Ltd | Ph: (03) 9351 7800 | Building 3/1 Cawley Rd, Brooklyn VIC 3012 www.mcmservices.com.au/ |
| Australasian Technical Services | Ph: (03) 9567 8400 | 4 Edward St, Oakleigh VIC 3166 www.atstech.com.au/ |

10.2 Asbestos Waste Disposal

The following Melbourne Metropolitan waste disposal sites accept asbestos waste:

| Suburb | Address | Phone |
|-------------------------------------|---|---------------------------|
| Commercial & Domes | | |
| Bowser | 5 Coleman Rd, Bowser VIC | 0419398612 or 5722 0888 |
| Bulla | 500 Sunbury Rd, Bulla VIC | 9307 1348 |
| Campbell's Creek | Sluicers Rd, Campbell's Creek VIC | 5470 5348 or 5471 1700 |
| Dooen | 81 Ladlows Rd, Dooen VIC | 5382 9777 |
| Forge Creek (near Bairnsdale) | 200 Johnstons Rd, Forge Creek VIC | 5152 6353 |
| Eaglehawk | 191–193 Upper California Gully Rd, Eaglehawk VIC | 5446 3917 |
| Fyansford | 1–503 Hamilton Hwy, Fyansford VIC | 5224 2251 |
| Mildura | Ontario Ave, Mildura VIC | 5018 8100 |
| Patho | 320 Davis Rd, Patho VIC | 5456 2500 or 0429 192 965 |
| Portland | Derrill Rd off Cape Nelson Rd, Portland VIC | 5523 3768 |
| Smythesdale | 1380 Glenelg Hwy, Smythesdale VIC | 5342 8540 or 5320 5500 |
| Swan Hill | Swan Hill–Sea Lake Rd, Swan Hill VIC | 5032 9260 |
| Tuerong | 435 Balnarring Rd, Tuerong VIC | 5989 7333 |
| Wollert | 45 Bridge Inn Rd, Wollert VIC | 9408 1299 |
| Commercial Only | | |
| Bulla | 600 Sunbury Rd, Bulla VIC | 9307 1048 |
| Longford | Dutson Downs. Lochsport Rd, Longford VIC | 1800 066 401 |
| Lyndhurst | 890 Taylors Rd, Lyndhurst VIC | 9702 8111 |
| Stawell 492 Pomonal Rd, Stawell VIC | | 0419 309 737 or 5352 1433 |

Up to date as per VIC EPA, October 2019

For other locations, refer to list provide on EPA Victoria website:

www.epa.vic.gov.au/your-environment/waste/landfills-that-accept-asbestos-in-victoria

11. Further Information

The following are government information pages with lots of practical guides and information on Asbestos:

WorkSafe Victoria Asbestos Information page: www.worksafe.vic.gov.au/safety/topics/asbestos

Victorian Government Asbestos Information page: www.asbestos.vic.gov.au/home

Australian Government Asbestos Safety and Eradication Agency www.asbestossafety.gov.au/

Asbestos Education Committee www.asbestosawareness.com.au

12. Asbestos Records Section

It is recommended that the following information be filed in this Section:

- Records of re-inspections and review of the Asbestos Management Plan;
- Reports of asbestos materials removal and clean-up works;
- Clearance certification and air monitoring reports;
- Reports of inspections by an asbestos materials consultant/hygienist;
- Reports of accidental damage and clean-up procedures;
- Details of licensed asbestos materials removal contractors;
- Details of staff and tenant briefings/training;
- Details of contractor inductions;
- Asbestos materials scope of works, work outlines, procedures and specifications; &
- Waste Disposal Dockets resulting from Asbestos Removal Works.