

November 2015 *Revised August 2017 Revised October 2020*

ASSET MANAGEMENT DIRECTORATE



ASBESTOS MANAGEMENT PLAN

FOR NSW GOVERNMENT SCHOOLS DISTRIBUTED WITH: MEMORANDUM TO PRINCIPALS DN/15/00038 0/08/17_2912



MEMORANDUM TO PRINCIPALS

ASSET NOTICE

DN/15/00038

Department of Education: Asbestos Management Plan 2015 (AMP 2015) - Revised

The Department of Education (DoE) has completed revision of the existing Asbestos Management Plan (AMP) issued in 2007 to ensure compliance with the *Work, Health and Safety Act 2011*.

The Department has worked with an independent health hygienist, other government agencies and in consultation with WorkCover NSW, to ensure procedures for the management of asbestos are best practice for an educational environment.

The DoE Asbestos Management Plan 2015 (AMP 2015) is now available on the DoE Asset Management Intranet at:

https://detwww.det.nsw.edu.au/assetmanagement/safecomp/asbestosf.htm

and will be placed on the DoE website for community access along with current school asbestos registers. The AMP 2015 will now be printed and distributed to Principals in schools, along with each school's current asbestos register and a Site Specific Asbestos Management Plan (SSAMP) for in-grounds asbestos where applicable.

Principals are directed to Section 9, pages 69 to 94, of the AMP 2015, which detail a range of asbestos issues requiring an Emergency Response. Once the distribution of the printed AMP 2015 is completed, Asset Management will be providing Webinars to further inform Principals, and a Question and Answers (Q&A) section will be provided online.

Key to the AMP 2015 is an associated Panel Contract for the supply of hygienist services to address asbestos issues identified by maintenance and capital works contractors, Asset Management Units and schools. Use of the Panel Contract will ensure DoE school Asbestos Registers are updated regularly whenever asbestos disturbance works are undertaken on NSW Government School sites. Details of the Panel contract can be found online at: https://detwww.det.nsw.edu.au/assetmanagement/assets/media/ASB Brochure.pdf

To address issues raised by WorkCover NSW, Asset Management will be surveying all Principals early in Term 4, 2015 to confirm:

- 1. the AMP 2015 has been received by the school,
- 2. that the Webinar has been viewed and
- 3. AMP 2015 Section 9 Emergency Response has been read and understood.

Should you require further advice, please contact Alan Smith, Manager Compliance and Safety (Ph: 9561 8956), Paras Doshi (Ph: 9561 8969) or Peter Smith (Ph: 9561 8224) Compliance and Safety Officers in Asset Management Directorate.

Michael Waterhouse R/Deputy Secretary, Corporate Services 30 September 2015

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Definitions

ned to be)
to asbestos and the h the Guidance Note HSC: 3003 (2005)]. listurbance works
/), a division
C)
ole groups of rock- olite, or any mixture
nitoring, work. os Assessors.
ger used.
os A

Class A licensed asbestos removalist

As per Part 8.10 of the WHS Regulations, a contractor, WorkCover NSW licensed to remove all types and quantities of asbestos.

Class B licensed asbestos removalist

As per Part 8.10 of the WHS Regulations, a contractor, WorkCover NSW licensed to remove any amount of non-friable asbestos, or ACM and ACD associated with the removal of non-friable asbestos or ACM.

Competent person

	For a clearance inspection under clause 473 – A person who has acquired through training or experience, the knowledge and skills and is able to carry out a clearance inspection:
	a. a certification in relation to the specified VET course for asbestos assessor work, or
	b. a tertiary qualification in work health and safety, occupational hygiene, science, building, construction or environmental health.
Crocidolite	Blue asbestos
DoE	Department of Education (prior to 1 July 2015, known as Department of Education and Communities (DoEC))
DFS	Department of Finances and Services
DPWS	Department of Public Works and Services, a division of Department of Finance and Services

Environmental consultant

Note: for the purposes of this plan, the hygienist and the environmental consultant are the same role. A qualified and/or experienced health and safety consultant engaged to provide advice on asbestos and to recommend management of asbestos containing materials.

f/mL Fibres per millilitre of air

Fair condition

Showing	small	amounts	of	damage /	deterioration
JIIOWIIIG	JIIIUII	amounts	U.	uumuyc /	actenoration

Facility manager

	Person with responsibility for the DoE Facility or a suitably appointed delegate
FMC	Facilities Maintenance Contractors; also termed as Facilities Maintenance Contractors (FMC)
Fibre	A particle of asbestos with a width of less than 3 μm and length greater than 5 μm , and with a length to width ratio of greater than 3:1.

Fibrous cement

Cement based building material containing reinforcement of either asbestos or non-asbestos fibres. Trade names include but are not limited to Super Six, Hardiflex, Hardiplank and Villaboard.

Friable asbestos

Any material that contains asbestos and is in a powder form or can be crumbled, pulverised or reduced to powder by hand pressure when dry.

Good condition

|--|

HACA Heads of Asbestos Coordination Authorities

Hazardous materials

Building materials that include asbestos, polychlorinated bi-phenols (PCBs), synthetic mineral fibres (SMFs) and lead based paints.

Hygienist Note: for the purposes of this plan, the hygienist will also be a competent person / asbestos assessor / WorkCover accredited licensed asbestos assessor as defined by regulations and selected from DoE hygienist panel.

Hygienist panel (contract)

A Public Works contract that provides a panel of three contractors for the supply of occupational hygienist services to DoE for the management of assets to ensure compliance with the relevant legislation, including the NSW Work Health and Safety (WHS) Regulation 2011, particularly as this relates to asbestos. All hygienists engaged under this contract are licensed asbestos assessors.

Licensed asbestos removalist

Means a person conducting a business or undertaking who is WorkCover NSW licensed under the WHS Regulations to carry out class A or class B asbestos removal work.

NATA

National Association of Testing Authorities. NATA is a government-endorsed provider of accreditation for laboratories and similar testing facilities, including asbestos sample analysis and sampling for airborne asbestos fibres.

Non-friable asbestos

	Means material containing asbestos that is not friable asbestos, including material containing asbestos fibres reinforced with a bonding compound.
••••••	
	Now South Wales Environment Protection Authority

NSV	V EPA	New South Wales Environment Protection Authority
•••••		
NSV	V EP&A Act	t
••••••		New South Wales Environmental Planning and Assessment Act
·····		

NSW OEH New South Wales Office of Environment and Heritage

Permit to work

A Permit to work authority will need to be issued to and signed by the contractor, acknowledging presence of asbestos containing materials in the work area/s identified in the register prior to commencing work. The contractor is to indicate the control measures to be used. Permit to work authorities will only be issued by the DoE Facility Manager (refer Appendix A).

PCBU	Person conducting a business or undertaking			
Poor condi	tion			
	Showing a large amount of damage / deterioration or that the material is unserviceable for its intended use			
POEO	Protection of the Environment Operations (POEO) Act			
NSW Public Works				

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NSW Public	Works				
	Department of Public Works & Services, a division of Department of Finances and Services Division				
PW	Department of Public Works & Services, a division of Department of Finances and Services Division				
Risk assessn	nent (asbestos)				
Low risk	Asbestos containing materials that pose a low health risk to personnel, employees and the general public providing they remain undisturbed. Refer to Section 3.4.				
Medium risl	C C C C C C C C C C C C C C C C C C C				
	Asbestos containing materials that pose a moderate risk to people in the area – there is a medium potential for the material to release asbestos fibres if disturbed. Refer to Section 3.4.				
High risk	Asbestos containing materials that pose a high health risk to personnel or the public in the area of the material – there is a high potential for the material to release asbestos fibres if disturbed, or a potential for the materials to release fibres even if undisturbed. Refer to Section 3.4.				
SSAMP	/P Site specific Asbestos Management Plan; also known as Asbestos in Grounds Management Plan				
WHS Act	t NSW Work Health and Safety Act 2011				
WHS regula	tion				
	NSW Work Health and Safety Regulation 2011				

1. Introduction

NSW Department of Education | Asbestos Management Plan

1.1 General requirements

All schools are required to notify their local Asset Management Unit (AMU) of any works to be carried out on their site. This includes work that may disturb asbestos containing material (ACM).

Please refer to School Asset Management Guidelines at:

https://education.nsw.gov.au/assetmanagement/media/documents/ procurements-And-contracts/assets.pdf

As policy and other asbestos related documents are subject to change, the most recent up-to-date advice may be found on the Department of Education (DoE) Asset Management Directorate (AMD) Intranet site at:

https://education.nsw.gov.au/assetmanagement/compliance-and-safety/asbestosinformation

This information is accessible by all school staff and DoE administrative staff.

All asbestos specific related files are maintained on the AMD Asset Management System (AMS), which are accessible by state office and AMU staff with principals able to access the same files via AMS on the web. Please also refer to Section 3 of this document.

1.2 Asbestos requirements

The DoE, as a *person with management or control of a workplace*, has an obligation under Part 8.3 of the NSW Work Health and Safety Regulation 2011 under the NSW Work Health and Safety Act 2011, to assess the risk of harm to the health and safety of any person arising from asbestos hazards.

Specifically, the Regulation states in clause 422 that: "[a] person with management or control of a workplace must ensure, so far as is reasonably practicable, that all asbestos or ACM at the workplace is identified by a competent person."

The Regulation also states in clause 425 that:

(1) A person with management or control of a workplace must ensure that a register (an asbestos register) is prepared and kept at the workplace.

- (2) The person must ensure that the asbestos register is maintained to ensure the information in the register is up to date.
- (3) The asbestos register must:
 - (a) record any asbestos or ACM identified at the workplace under clause 422, or likely to be present at the workplace from time-to-time, including:
 - 1. the date on which the asbestos or ACM was identified, and
 - 2. the location, type and condition of the asbestos or ACM, or
 - (b) state that no asbestos or ACM is identified at the workplace if the person knows that no asbestos or ACM is identified, or is likely to be present from time-to-time, at the workplace.
- (4) The person is not required to prepare an asbestos register for a workplace if a register has already been prepared for that workplace.
- (5) Subject to subclause (6), this clause applies to buildings whenever constructed.
- (6) This clause does not apply to a workplace if:
 - (a) the workplace is a building that was constructed after 31 December 2003, and
 - (b) no asbestos has been identified at the workplace, and
 - (c) no asbestos is likely to be present at the workplace from time-to-time.

This Asbestos Management Plan (AMP) for NSW DoE Facilities has been developed to address this obligation, as it specifically relates to the presence of asbestos on the site, by managing and minimising asbestos related health risks to personnel working on or visiting the site. This AMP is to be read in conjunction with any existing hazardous materials (asbestos) register for the premises.

Nothing contained within this AMP may be considered to alter or modify guidelines as set down in the SafeWork Australia code of practice titled: How to Manage and Control Asbestos in the Workplace: Code of Practice 2011, or the requirements laid down under all relevant New South Wales Legislation. No one section or part of a section of this

AMP should be taken as giving an overall

idea of this AMP. Each section must be read

in conjunction with the whole of this report,

section 9 to be used as an aid for DoE Facility staff to help determine appropriate responses to the discovery of suspected asbestos containing materials or particular incidents.

1.3 Objectives of the Asbestos Management Plan

This AMP details the approach to be taken by the DoE in managing the asbestos hazard in DoE Facilities by documenting procedures designed to minimise the risk of exposure to asbestos of all personnel on DoE Facility premises, including all DoE and Department of Public Works (PW) personnel, teaching staff, maintenance staff, students, maintenance contractors and other visitors. This AMP is to be used in conjunction with the hazardous materials (asbestos) register for the facility and/or any other records of asbestos containing materials or risk assessments or investigations undertaken for specific sites.

NSW Work Health and Safety Regulation 2011 clause 429 states: "A person with management or control of a workplace must ensure a written asbestos management plan is prepared for the workplace if asbestos or ACM has been identified or assumed present, or is likely to be present from time-to-time at the workplace.

The asbestos management plan must be maintained to ensure the information is up to date."

This AMP contains the following information:

- scope and limitations of the AMP
- overview of the risk assessment process
- asbestos related regulatory requirements
- organisational responsibilities
- management of in-situ asbestos containing materials
- safe working practices
- requirements for asbestos removal
- training, and
- emergency response procedures.

An example hazardous materials (asbestos) register for the facility is included in Appendix J of this document for ready reference. This register identifies the presence of asbestos within the DoE Facility, detailing the locations, risk assessment, condition and priority rating for ACMs identified in DoE Facility buildings. Details of in-ground ACMs have been included when previous asbestos containing material ground works have been undertaken.

The hazardous materials (asbestos) register will be stored on the DoE Asset Management System for access by AMU and state office staff. This is kept updated to provide a record of ACMs and remedial works carried out that may change the original entry.

1.4 Structure of the Asbestos Management Plan

1.4.1 Component parts

When following this management plan, the following sections should be considered:

- risk assessment of asbestos containing materials
- organisational responsibilities the persons and organisations responsible for implementing this plan
- managing asbestos in DoE Facility grounds
- managing asbestos in DoE Facility buildings
- Safe work practices using permits to work
- asbestos removal and disposal guidelines
- emergency response procedures
- principles of asbestos management controlling asbestos hazards
- asbestos information general information on asbestos containing materials and risks, and
- Methodology to update registers (Appendix G)
- Methodology to provide registers to persons (Appendix G)
- DoE Panel Contract (Appendix I)
- DoE Facility Hazardous Substances Register (Asbestos – Appendix K).

1.4.2 User structure



Figure 1.0 Asbestos management user structure*

*Please note: Figure 1.0 is a basic flow chart of actions which are to be implemented; it does not aim to document specific items such as communications and use of the panel contract.

1.5 Regulatory framework

All work on NSW DoE Facility buildings and grounds involving the assessment, management, removal, encapsulation, transport, disposal or otherwise potential disturbance of asbestos containing materials, shall be performed in accordance with all relevant State Acts, Regulations, Codes of Practice, Advisory Standards and industry standards, including the following as of February 2015:

NSW Work Health and Safety Act 2011

www.legislation.nsw.gov.au/maintop/view/ inforce/act+10+2011+cd+0+N

 NSW Work Health and Safety Regulation 2011

www.legislation.nsw.gov.au/maintop/view/ inforce/subordleg+674+2011+cd+0+N

 How to Manage and Control Asbestos in the Workplace: Code of Practice

www.workcover.nsw.gov.au/__data/assets/ pdf_file/0015/15216/how-to-manage-controlasbestos-workplace-code-of-practice-3560.pdf

 How to Safely Remove Asbestos: Code of Practice

www.workcover.nsw.gov.au/__data/assets/ pdf_file/0016/15217/how-to-safely-removeasbestos-code-of-practice-3561.pdf

 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition [NOHSC: 3003 (2005)]

www.safeworkaustralia.gov.au/ AboutSafeWorkAustralia/WhatWeDo/ Publications/Documents/236/GuidanceNote_ Asbestos Blueprint: A guide to roles and responsibilities for operational staff of state and local government November 2011, as prepared by the Asbestos Co-Regulators Working Group (ACWG) for the NSW Government

www.workcover.nsw.gov.au/__data/assets/pdf__file/0005/19571/heads_asbestos_coordination__authorities_asbestos_blueprint.pdf

As information becomes available from timeto-time, changes to advice provided within this AMP or supporting documentation and/ or specific investigations may be updated as required from any or above.

1.6 Users of the Asbestos Management Plan

It is the intention that the preparation and use of this AMP assists both the user and duty holder to comply with the Work Health and Safety Act 2011 (WHS Act), the How to Manage and Control Asbestos in the Workplace Code of Practice and How to Safely Remove Asbestos Code of Practice. Nothing contained within this report may be considered to alter or modify the above act or guidelines or the requirements laid down under all relevant NSW Legislation. Those responsible for the management of DoE Facilities and Contractors, are duty holders who have a duty of care. Each duty holder is required to comply with all relevant NSW Legislation.

This AMP is designed for all duty holders where asbestos and asbestos containing materials may be present. Where events or situations arise that cannot be managed under this plan by DoE Facility staff or volunteers and/or contractors, this AMP sets out the actions to be followed and the responsibilities of the NSW Department of Education who will manage all asbestos issues. Duty holders include:

- Those responsible for the management of DoE Facilities, such as:
 - school principal
 - AMU managers
 - asset management directorate

- workers¹ including voluntary staff, and
- contractors.

Please refer to Section 2.1 to 2.8 under Section 2 in this plan.

1.7 Inputs

The development of this plan has been undertaken with the following inputs and consideration:

- Consultation with NSW Department of Education, NSW Public Works (PW), WorkCover NSW and NSW Health; and is also set out in accordance of the following applicable legislation and codes of practice:
 - NSW Work Health and Safety Act 2011
 - NSW Work Health and Safety Regulation 2011
 - How to Manage and Control Asbestos in the Workplace: Code of Practice 2011
 - How to Safely Remove Asbestos: Code of Practice 2011

This AMP should be revised when any new regulations and/or codes of practice come into force.

Each duty holder, including contractors, are to familiarise themselves with the above documents before engaging in works.

1.8 Control revision and amendments

This AMP is subject to ongoing development as further consultations take place and as further relevant codes of practice and/or advice on asbestos management become available.

Each new revision of this AMP will be made available as an electronic document to all registered copy holders with an instruction that the superseded copy be destroyed. Changes to the recent revision will be highlighted. The revision number is included at the end of the document number, which is noted on each page. When amendments occur, the entire document will be made available electronically with the revision number updated accordingly.

The Project Director or Coordinator will approve amendments by initial in the Approved column below.

Minor amendments can be made to the electronic copy of this document without reissuing it. The following provides a record of amendments to this document.

Revision	Date	Description	Page	Clause	Approved

The same form will be used when updating the DoE online version of this DoE AMP. All site managers will be advised by memoranda and email when significant changes are made.

All DoE Asbestos Registers and this AMP are available to the community generally via the internet at <u>www.dec.nsw.gov.au/about-us/supplying-to-us/asbestos-register</u> with the most up-to-date information available internally on the DoE Asset Management System (AMS).

¹ The definition of a 'worker' includes any person who carries out work for a <u>'person conducting a business or undertaking'</u> (PCBU – the new term that includes employers).

2. Organisational responsibilities

It should be understood that this and similar AMP guidance documents, such as those prepared for the management of grounds, is general in nature and does not replace the need for site specific risk assessment to be undertaken by all parties involved in works prior to undertaking works on a site that might impact upon known location/s of asbestos containing materials (ACM) or uncover unexpected finds of asbestos containing materials (ACM).

This AMP is designed to be integrated into existing DoE Facility operations and maintenance programs. The following duty holders are responsible for the implementation of the control measures discussed in this document.

2.1 Department of Education

The DoE's (AMD, AMU, FMC) responsibilities include:

- **1.** Ensuring that an asbestos register is prepared and kept at the workplace.
- Ensuring that previous asbestos records, including clearance certificate/s, are maintained and made available to relevant persons. This may not necessarily be at the place of work, but they may be kept at a central source and provided as required.

All DoE asbestos registers and this AMP are available to the community generally via the internet at <u>www.dec.nsw.gov.au/about-us/</u> <u>supplying-to-us/asbestos-register</u> with the most up-to-date information available internally on the DoE Asset Management System (AMS).

Please refer to Appendix G and K of this AMP.

- **3.** Ensuring that the register is reviewed, at least whenever the AMP is reviewed, and also whenever further asbestos or ACM is identified at the workplace, or asbestos is removed, altered or disturbed, sealed or enclosed at the workplace.
- Ensuring any employee, contractor or consultant undertaking works that may result in disturbance or impact to ACM checks the on-site register for an asbestos register prior to commencing works.
- **5.** Ensuring that all works undertaken by any employee, contractor or consultant

are performed in such a way that either avoids disturbance or impact to ACM, or is performed with appropriate and effective controls in place to eliminate or minimise as far as practicable any potential for exposure of persons to asbestos.

- 6. Ensuring that a permit to work system is to be implemented for any works where ACM may be disturbed or impacted
- 7. Ensuring that the AMP is reviewed and, if necessary, revised at least once every five years or whenever the asbestos register or any associated control measures are reviewed or modified; whenever asbestos is removed or disturbed, sealed or enclosed at the workplace; if the AMP is no longer adequate for managing asbestos or ACM at the workplace; or if a health and safety representative reasonably requests a review be undertaken in accordance with the provision of the regulations.
- 8. Ensuring that the AMP is readily assessable to a worker who has carried out, carries out or intends to carry out work at the workplace; health and safety representatives; a PCBU who has carried out, carries out or intends to carry out work at the workplace; a PCBU who has required, requires or intends to require work to be carried out at the workplace.
- **9.** Ensuring adequate management of systems that make certain suitable contractors and consultants are engaged to carry out asbestos related works and to ensure the necessary safety standards are being maintained for any such works.
- **10.** Ensuring that appropriate work methods and control measures of any employee or contractor working on areas of known ACM meet the conditions and standards approved for the DoE Facility.
- **11.** Ensuring the use of the DoE hygienist panel is mandated for all emergency and other situations of asbestos related works, including when arranging for the undertaking of inspections; sampling and risk assessment of suspected asbestos containing materials / products; determination of asbestos in soil as nonfriable/friable; preparation of management documentation, air monitoring and

clearance inspections; and updating site asbestos records in the DoE asbestos register databases using the Asbestos Register Review Tool (ARRT).

- Engaging accredited and/or licensed removal contractors when required in response to emergency situations and other situations when required (directly or indirectly through agent of DoE).
- **13.** Ensuring that additional occurrences of asbestos containing materials are recorded in the hazardous materials (asbestos) register.
- **14.** Ensuring that a copy of the asbestos register and AMP is transferred to successive persons whose role is to maintain management or control of each workplace.

Due to the extensive nature of DoE's Asset base and resulting responsibilities, this AMP has been prepared and is to be used in conjunction with the hazardous materials (asbestos) register for each particular facility and/or any other records of asbestos containing materials or risk assessments or investigations undertaken for specific sites.

Where individual registers and/or AMPs exist, those documents may be reviewed and revised if necessary, for example when there is a review of the asbestos register or a control measure; when asbestos is removed from or disturbed, sealed or enclosed at the workplace; when the plan is no longer adequate for managing asbestos or ACM at the workplace; or when a health and safety representative requests a review if they reasonably believe that any of the matters listed in the aforementioned points affects or may affect the health and safety of a member of their work group and the AMP was not adequately reviewed.

2.2 Use of DoE panel contract

This DoE AMP (2015) will require the panel contract to be used for all hygienist (asbestos assessor) services as to be detailed in the contract. This will allow DoE to obtain, from the panel contractors, electronic copies of all reports and testing results in a compliance file format for direct uploading onto the AMS, ie School Code_Compliance Area_Date_Type of Report (eg 1234_ASB_030113_AMP). Where there is any significant work undertaken on a DoE site, update of the asbestos register will be undertaken when a final clearance certificate is provided, using a new tablet module – the Asbestos Register Review Tool (ARRT) – that allows for more efficient updating of asbestos data.

The panel contract will provide asbestos related services to support;

2.2.1 Capital works (Major)

Capital works are works in excess of \$0.5 million, including new schools, new buildings and major refurbishments. The range of services can include site inspections, Hazardous Materials Surveys, materials testing, air monitoring and clearance certificates. It would be expected that one member of the panel contract be appointed to a particular building project, to ensure consistency in reporting. For new construction, hygienist (asbestos assessor) services will be minimal, as there will be no asbestos used in construction. In works involving existing facilities, the range of services may be more extensive and would finish with updating of the existing asbestos register. Updating of the existing asbestos register will include those spaces refurbished, and spaces in the remainder of the school not previously accessed; sampling / testing of materials listed as assumed asbestos; inspection of carpeted spaces to confirm the absence of vinyl containing asbestos, and subfloor and ceiling void spaces as made accessible.

2.2.2 Minor works

These are works usually less than \$1.0 million, and typically include the construction of small new facilities, refurbishment of areas within a building, provision of IT services, electrical upgrades and installation of air cooling. The demand for hygienist (asbestos assessor) services will be similar to those required for Major Works.

2.2.3 Maintenance works

Asbestos related works initiated as a result of maintenance activities are expected in most cases to be minor and are mostly less than 10m². If the works are more extensive, programmed maintenance works are to be undertaken by school Facilities Maintenance Contractors (FMC). The largest of the maintenance works will be similar to a small Minor Works and the necessary hygienist (asbestos assessor) services. Minor asbestos affectations (eg a hole to be advanced through a cement sheet wall or damaged eave sheet) will require timely materials testing that will permit timely resolution.

2.2.4 School initiated works

DoE AMP (2015) will require that any school initiated / funded works use the panel contract to provide hygienist services. All hygienist (asbestos assessor) services provided to the school will have the same file naming convention as DoE, FMC or DPWS, and be reported to DoE. The inclusion of an asbestos register update as part of a final clearance certificate may not be required where a total project cost is less than \$50,000.

2.2.5 Fibrous cement in grounds

Since 2003 DoE has had a separate program to address school sites that have asbestos related grounds issues, these are typically fragments of bonded AC (fibro) fragments. Services provided in response to a positive notification of fragments would be material testing, clearance certificate and a hygienist (asbestos assessor) report detailing the area of the site, pick-up report from FMC and air monitoring. A site specific AMP is created and maintained for grounds asbestos issues. For a new asbestos affected site, a site specific AMP is created and updated whenever remediation works are completed or additional incidents reported. Updating of facilities' asbestos registers are not triggered by grounds issues.

2.2.6 State office programs

State office may undertake asbestos register updates for groups of schools where there are extensive quantities of assumed asbestos or spaces in need of survey. Such groups of schools would likely be selected geographically to control travel and accommodation costs. A minimum of two panel contract members would be invited to provide a price for any such work.

2.3 Hygienist services, for asbestos, provided by the panel contract

Note that for the purposes of this plan, the hygienist will also be a Competent Person / Asbestos Assessor as defined by Regulations and selected from the DoE hygienist panel.

Advice is to be provided that is consistent with the DoE Asbestos Management Plan (2015), which is compliant with the relevant NSW legislation and national requirements. There is to be reference to advice from other jurisdictions.

Ad-hoc advice is provided where an investigation is required. The advice typically provides options for resolution of an issue and typically is finalised using a Clearance Certificate or site specific AMP.

2.3.1 Site inspections

Site inspections may be required for existing schools where a new building is planned for an unused part of the site. Practical advice from the hygienist (asbestos assessor) to facilitate the project in a cost effective way is expected.

2.3.2 Hazardous material surveys

Hazardous materials surveys are typically undertaken for existing buildings and demountables proposed for refurbishment or demolition. These surveys generally include assessment for asbestos, PCB, lead, etc, in addition to asbestos which is already covered by the asbestos register under this AMP, which cannot be undertaken in existing operating schools.

2.3.3 Clearance certificate

A clearance certificate is provided when asbestos removal or remediation is completed, and where a clearance certificate is required under the regulations. This is common in facility refurbishment works and grounds remediation works.

2.3.4 Asbestos registers update using ARRT

2.3.4.1 Building

Updating an asbestos register using ARRT is undertaken whenever asbestos or ACM is identified at the workplace, or asbestos is removed, altered or disturbed, sealed or enclosed at the workplace. Additional information to be added to the register as a result of hygienist (asbestos assessor) activity will include areas inspected that were not previously accessible, additional samples collected, etc. It is intended that all register information is to be available via the internet. Where ceiling and underfloor samples are collected, air monitoring needs to be undertaken.

2.3.4.2 Demountables

Asbestos registers are to be updated annually, with one upgrade being made early in each school year once all demountable movements are completed to resolve accommodation needs. The bulk of this movement usually occurs in March. In general it is expected that additional demountable movements during the year occur infrequently and on a smaller scale.

Before movement of any demountable is undertaken, an asbestos checklist must be completed; this is detailed in Appendix E.

All New System (NS) Demountables were constructed asbestos free.

Old System (OS) Demountables were constructed with asbestos containing materials (ACM), with all ACM being removed during off-site refurbishment. Such Demountables are considered to be 'asbestos free', with the exception of remnant mastic material that was unable to be extracted from window frames. Any asbestos fibres in this mastic are held within the 'sticky' substrate – this part of the window frame is encapsulated in the wall.

Please refer to Appendix G for example flowcharts for updating of the register by panel contract hygienist/s.

2.3.5 Site specific AMP

A site specific AMP is produced for a DoE site with grounds asbestos (usually fibrous cement) occurrence. Where there is a reoccurrence, the site specific AMP is updated when a Clearance Certificate is produced or remediation works completed.

2.3.6 Analytical services

2.3.6.1 Materials testing

Materials testing for the full range of asbestos containing materials, which in DoE facilities is mostly non-friable asbestos cement and vinyl flooring, will be required. Friable, fibrous materials have been removed wherever found in previous programs. While there will be individual samples collected and analysed for much of the time, there will also be survey programs where bulk quantities greater than 50 will be submitted at any one time. Bulk discounts will be tendered.

DoE requires that all materials testing for asbestos be undertaken at a NATA accredited laboratory.

2.3.6.2 Air monitoring

Air monitoring will be required for all grounds pick-ups and as needed for disturbance works. Air monitoring will be required where samples are taken in underfloor and ceiling spaces.

Air monitoring should be in accordance with the National Occupational Health & Safety Commission's Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition [NOHSC: 3003 (2005)] and be conducted by National Association of testing Authorities (NATA) accredited personnel operating from a NATA registered laboratory.

2.3.7 Training services

2.3.7.1 Asbestos sample collection

The training of nominated personnel will be required to allow for timely sample collection and materials testing. An agreed training regime will be negotiated between all panel members. Personnel to be trained may be from DoE, DPWS, FMC or sub-contractors (to FMC).

2.3.7.2 Asbestos awareness training

It is best practice that DoE Asset Management personnel and Facilities Maintenance Contractors who are not likely to be exposed to asbestos but who work in areas where asbestos is or may be present, be provided with asbestos awareness training.

Asbestos awareness training is to be provided by a consultant selected from the DoE hygienist panel.

2.4 DoE facility manager

In addition to this AMP, the DoE facility manager is to make extensive use of documents mentioned within Appendix A, E and G of this AMP. The files in Appendix E, regarding Engaging Contractors are available from the DoE Intranet, Work Health and Safety (WHS) Directorate / Safety Management System / Student, contractor and visitor safety.

These set out the broad responsibilities of facility managers.

The responsibilities of the DoE facility manager (eg School Principal or AMU officer) or suitably appointed delegate include:

- **1.** Ensuring asbestos situations are safely controlled, including contractor inductions where appropriate.
- 2. Ensuring that employees, contractors, consultants, external users and other visitors have been suitably informed about the presence of asbestos on the site, the potential risk associated with asbestos, the precautions and management procedures to be adopted and are referred to the on-site asbestos register. The DoE facility manager is to let all users of the site know that information is also available on the internet.
- **3.** Ensuring staff, student and visitor concerns about asbestos are dealt with in a satisfactory and timely manner, with support by the AMU as required.
- **4.** Entering any observations of potential asbestos containing material/s directly into the Asset Management System.
- **5.** Issuing of Permits to Work where asbestos containing materials may be disturbed or impacted upon.
- **6.** Maintaining a register of all Permits to Work involving asbestos containing materials that have been issued and cancelled.
- Ensuring that the use of the DoE panel contract is mandated for all asbestos disturbance/s, including those undertaken by schools under the control of the DoE facilities manager.

2.5 Agent of DoE such as Department of Public Works or similar – where engaged by DoE

The responsibilities of the agent include:

- 1. Ensuring that all staff of the agent who visit the site as part of undertaking works review the on-site asbestos register.
- 2. Management of systems to ensure suitable contractors are engaged to carry out asbestos related works and to ensure the necessary safety standards are being maintained for any such works, and that all are referred to the onsite asbestos results for further information.
- **3.** Ensuring that appropriate work methods and control measures of any staff member or contractor working on areas of known asbestos contamination, meets all legislative requirements.
- 4. Maintenance of management systems to ensure suitable consultants from the DoE hygienist panel are engaged to carry out asbestos related works, and to ensure the necessary safety standards are being maintained for any such works, and that all are referred first to the onsite asbestos results for further information.
- 5. Arranging for assessment and sampling of suspected asbestos containing materials / products by consultants engaged from the DoE hygienist panel, if not mentioned in the register or not previously tested (ie listed as 'Assumed asbestos').
- 6. Ensuring asbestos situations are safely controlled, including the labelling of asbestos remaining in-situ by consultants engaged from the DoE hygienist panel, where required.
- 7. Engaging consultants from the DoE hygienist panel when required in response to emergency situations and other situations when required.

Use of the DoE hygienist panel is mandated for all emergency and other situations of asbestos related works, including, when arranging for the undertaking of inspections; sampling and risk assessment of suspected asbestos containing materials / products, determination of asbestos in soil as non-friable / friable; preparation of management documentation, air monitoring and clearance inspections; and updating site asbestos records in the DoE asbestos register databases using the ARRT. **8.** Engaging removal contractors who are approved by DoE when required in response to emergency situations and other situations when required.

Note: Should a contractor be used on-site who is not engaged by the agent, it is a DoE requirement that the contractor meets all of the requirements as set out above.

In addition to this AMP, the agent of DoE is to make extensive use of documents mentioned within Appendix A to K of this AMP.

2.6 DoE staff and volunteers

DoE staff responsibilities include:

- Informing the Facility Manager of the presence of any previously unknown asbestos hazard or a suspected asbestos hazard on-site. This may require reference to the on-site asbestos register.
- **2.** Complying with the DoE Facility AMP to ensure staff or students are not at risk of exposure to airborne asbestos fibres.

2.7 Facilities Maintenance Contractors (FMC) and other contractors

A person conducting a business or undertaking has a primary duty of care to ensure workers and others are not exposed to risks to their health and safety. All duty holders are to consult, cooperate and coordinate with each other as well as consulting with workers and health and safety representatives.

All contractors (including facility maintenance contractors and staff) involved in the undertaking of works (including preparatory stages) should be reminded that this and similar AMP guidance documents, such as those prepared for the management of grounds, are general in nature, and do not replace the need for site specific risk assessment to be undertaken by all parties involved in works prior to undertaking works on a site that might impact upon known location/s of asbestos containing materials or uncover unexpected finds of asbestos containing materials.

All projects require a review of a complete asbestos survey prior to contract. If any doubt exists as to the completeness of an existing register then a contractor must discuss this concern with the DoE representative, and if required engage the services of a consultant from the DoE hygienist panel prior to the contract being determined.

As a PCBU, contractors' responsibilities include:

- Ensuring that they and/or their contractors refer to the on-site asbestos register for information and identify any asbestos or ACM that they have management or control of. The PCBU is to note that the existing register is a non-destructive survey and is to be used as a guide only.
- 2. If there is uncertainty as to whether work is asbestos related work, assume asbestos is present or arrange for an analysis of a sample to be undertaken by a consultant engaged from the DoE hygienist panel to determine if asbestos or ACM is present. Analysis is to be completed by a laboratory accredited by NATA to do so.
- **3.** The DoE is to be notified if any asbestos or ACM is identified and not included in the asbestos register for the workplace. A ready reckoner may be issued to the preferred contractor upon procurement (perhaps attached with the purchase order) explaining where the register may be obtained from. Please refer to Appendix G of this AMP.
- **4.** If they and/or their contractors consider that the work they are about to do will disturb asbestos, they are to discuss this with the DoE representative.
- 5. If advice is required then the DoE representative is to consult with and/or refer details of the DoE hygienist panel members to the contractor.
- 6. Ensuring that work methods and procedures comply with the relevant legislation, codes of practice, Advisory Standards and industry standards, and undertake work according to the requirements nominated by DoE.
- Employing suitably trained, skilled and competent staff on DoE Facility projects. Determine if additional training is required prior to taking on or commencing works.

- **8.** Ensuring that their employees are inducted in safe work procedures for asbestos containing materials / products.
- **9.** Obtaining the necessary approvals from regulatory authorities prior to starting any asbestos removal or maintenance activities (including appropriate asbestos removal licences).
- **10.** Ensuring that all work is conducted in a safe and competent manner.
- 11. Ensuring that a competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel carries out air monitoring of the work area if there is uncertainty as to whether the exposure standard is likely to be exceeded.
- **12.** Ensuring FMC are disposed of in an appropriate manner at a licensed landfill facility.
- **13.** Retaining records of materials disposed of at a licensed landfill facility (eg tipping dockets).
- **14.** Obtaining the corresponding asset number and details and providing all documentation, including analysis reports, clearance certificates, air monitoring and disposal documentation (including tipping dockets) via a member of the DoE hygienist panel to the agent of DoE and DoE.

In addition to this AMP, the contractor is to make extensive use of documents mentioned within Appendix A to K of this AMP.

2.8 Contractors involved in construction works

Construction work includes any work on a structure involving:

- maintenance and repair
- alteration and renovation
- construction and commissioning
- conversion, refurbishment and fitting out
- Decommissioning, demolition and dismantling.

A person conducting a business or undertaking has a primary duty of care to ensure workers and others are not exposed to risks to their health and safety. All duty holders are to consult, cooperate and coordinate with each other as well as consulting with workers and health and safety representatives.

As a PCBU, contractors' responsibilities include:

- 1. Ensuring that they and/or their contractors refer to the on-site asbestos register for information and identify any asbestos or ACM that they have management or control of. The PCBU is to note that the existing register is a non-destructive survey and is to be used as a guide only.
- 2. If there is uncertainty as to whether work is asbestos related work, assume asbestos is present or arrange for an analysis of a sample to be undertaken to determine if asbestos or ACM is present. Analysis is to be completed by a laboratory accredited by NATA to do so and selected from the DoE hygienist panel.
- **3.** The DoE is to be notified if any asbestos or ACM is identified and not included in the asbestos register for the workplace. A ready reckoner may be issued to the preferred contractor upon procurement (perhaps attached with the purchase order) explaining where the register may be obtained from. Please refer to Appendix G of this AMP.
- **4.** If they and/or their contractors consider that the work they are about to do will disturb asbestos, they are to discuss this with the DoE representative.
- If advice is required then the DoE representative is to consult with and/or refer details of consultant panel members from the DoE hygienist panel to the contractor.
- 6. Ensuring that work methods and procedures comply with the relevant legislation, codes of practice, Advisory Standards and industry standards, and undertake work according to the requirements nominated by DoE.
- Employing suitably trained, skilled and competent staff on DoE Facility projects. Determine if additional training is required prior to taking on or commencing works.

- **8.** Ensuring that their employees are inducted in safe work procedures for asbestos containing materials / products.
- **9.** Obtaining the necessary approvals from regulatory authorities prior to starting any asbestos removal or maintenance activities (including appropriate asbestos removal licences).
- **10.** Ensuring that all work is conducted in a safe and competent manner.
- **11.** Ensuring a competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel carries out air monitoring of the work area if there is uncertainty as to whether the exposure standard is likely to be exceeded.
- **12.** Ensuring FMC are disposed of in an appropriate manner at a licensed landfill facility.
- **13.** Retaining records of materials disposed of at a licensed landfill facility (eg tipping dockets).
- **14.** Obtaining corresponding asset number and details and provide all documentation, including analysis reports, clearance certificates, air monitoring and disposal documentation to the agent of DoE and DoE.

In addition to this AMP, the contractor is to make extensive use of documents mentioned within Appendix A to K of this AMP.

3. Asbestos management

NSW Department of Education | Asbestos Management Plan

3.1 General

The management of in-situ asbestos is important to ensure asbestos containing materials and other non-friable asbestos products are not damaged or deteriorate to such an extent that DoE Facility staff, students, contractors or visitors are unnecessarily exposed to airborne asbestos fibres.

The requirements of the contractor site induction and permit to work system (refer Section 3.8.3) will aid in the management of in-situ asbestos containing materials.

3.2 Principles of asbestos management

3.2.1 General principles

The NSW Department of Education' principles of asbestos management have been fully adopted from general principles published by the SafeWork Australia: How to Manage and Control Asbestos in the Workplace: Code of Practice 2011. The key principles are summarised below:

- Asbestos removal may not be immediately necessary, but must be completed before a structure, or part of a structure, is demolished.
- Removal of asbestos should be subject to priority setting, determined by the condition and location of the asbestos as well as scheduled refurbishment works.
- **3.** Asbestos presents a risk only when it is airborne. The risk to health increases as the number of fibres inhaled increases.
- 4. Wherever practicable, substitutes shall be found for asbestos products. Such substitutes shall be thoroughly evaluated before use, to ensure that they do not constitute a health hazard. Ultimately, all asbestos products should be eliminated. Note: No asbestos containing materials (ACMs) may be reinstalled or reused. Where any ACMs is disconnected, it must be replaced with non-asbestos containing product.
- Asbestos that has been incorporated into a stable matrix can be found in many working environments. Provided the matrix remains stable and no airborne

dust is produced, it presents a negligible health risk.

- 6. The presence of asbestos should be identified after reference to the on-site asbestos register for information. Further investigation may be warranted where disturbance works are to be undertaken.
- 7. No person shall be exposed to the risk of inhalation of asbestos in the course of employment without being provided with full information of the work health and safety consequences of exposure and appropriate control strategies.
- At present it is not possible to assess whether there is a level of exposure to asbestos in humans below which an increased risk of cancer would not occur. Accordingly, exposure to asbestos should always be kept to a minimum.
- **9.** Asbestos removalists and maintenance workers in an asbestos environment must be suitably protected.
- **10.** The recognised occupational exposure standard for asbestos is that adopted by SafeWork Australia. The method used to measure exposure to asbestos is the Membrane Filter Method as endorsed by the National Commission; Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition [NOHSC: 3003(2005)]
- **11.** Products containing asbestos in-situ shall be labelled accordingly where required.
- **12.** The spraying of asbestos shall be prohibited. All future use of asbestos for insulation purposes shall be prohibited.

The general principles of asbestos management (and an AMP) are broadly covered by four separate phases. These are:

- the identification
- the evaluation
- the control phase
- the ongoing monitoring / re-assessment phase.

These phases are best illustrated by the following flow chart in Figure 3.1.

Procedures need to be designed and implemented to appropriately control any asbestos hazard, to ensure that personnel are not exposed to asbestos to an extent likely to cause danger to health. These procedures can be aligned to the DoE Work Health and Safety hierarchy as described below under Control of Asbestos Hazards.

3.2.2 Control of asbestos hazards

The control of asbestos hazards should utilise the most appropriate method applicable to the particular circumstances. Based upon the assessment of the condition of the asbestos, its potential to suffer damage or mechanically degrade, and the likelihood of exposing people to airborne asbestos, the following hierarchy of control strategies are relevant:

3.2.2.1 Removal

Removal and disposal of ACMs undertaken where there is an immediate or likely risk of fibre release, eg asbestos insulation.

3.2.2.2 Substitution

Replacement of ACMs with non-hazardous materials (eg replacement of asbestos cement with compressed fibre cement sheeting).

3.2.2.3 Mitigation (re: removal)

Clean-up or decontamination of areas such as surface pick-up.

3.2.2.4 Isolation

Encapsulation or sealing of in-situ ACM (eg painting exposed surfaces of asbestos cement products, sealing fill materials in the ground with a bitumen surface).

3.2.2.5 Engineering controls

It is DoE policy that these are not to be considered for DoE Facilities.

3.2.2.6 Administrative procedures

Inclusive of training, Asbestos Management Plans and Safe Work Procedures.

3.2.2.7 Personal protective equipment (PPE)

To be used by persons working on or near asbestos containing materials, eg respiratory protection. Use of specific PPE is to be in accordance with relevant guidelines and standards following appropriate risk assessment.

3.2.2.8 Atmospheric monitoring

On occasions, and where required by regulations, Para-occupational airborne asbestos fibre monitoring may be required as a way of verifying the efficacy of any control measures implemented.

3.2.2.9 Health monitoring

Under the NSW Work Health and Safety Regulation 2011, health monitoring may also be required. It is not anticipated that DoE will be required to provide / undertake health surveillance of its employees in relation to asbestos, but if needed this would be in accordance with health monitoring (Clause 435).

It is DoE policy that all risks (for example hazardous substances including asbestos) should be suitably managed to ensure that health surveillance is not required for staff, visitors and contractors (eg by using an asbestos management plan). This is achieved by ensuring that works disturbing asbestos are carried out in accordance with applicable statutory requirements and relevant guidance documents. For example by using existing site specific asbestos management plans, the on-site asbestos registers and appropriate procedures of monitoring as per Clauses 435.


Figure 3.1 General principles of an Asbestos Management Plan²

3.3 Identifying the risk

All DoE Facilities were surveyed for FMC from October 2007 – May 2008 after which an initial asbestos register was issued to all schools.

All DoE asbestos registers and this AMP are available to the community generally via the internet at <u>www.dec.nsw.gov.au/about-</u> <u>us/supplying-to-us/asbestos-register</u> with the most up-to-date information available internally on the DoE Asset Management System (AMS).

The information in the register is a record of the location of any asbestos and is used to inform the risk assessment.

A material assessment of ACM is completed during the inspection to assess the type of Asbestos and ACM, and level of damage or deterioration.

The surveyor, selected from the DoE hygienist panel, takes into consideration the location of the ACM to formulate the risk ratings and subsequent remediation priority mentioned below.

The surveyor updates the register by way of the Asbestos Register Review Tool (ARRT).

In addition to the completion of the survey, register and risk assessment, an important component of the management of ACM is regular condition assessment.

A condition assessment may be conducted for example by a Facility Manager. The Facility Manager is to inspect for building materials that are damaged or could be easily disturbed. It should be mentioned that this is not a survey, but simply an inspection of the fabric of the building looking for damage. If damage is found, and the material is known to contain asbestos or the Facility Manager is not sure, then the Facility Manager is to contact their AMU.

3.3.1 Asbestos register

The DoE Facility Manager is responsible for ensuring that the asbestos register is available to any contractors who are planning works that may involve the disturbance of asbestos containing materials. The register must be issued prior to works being undertaken. Please note that the existing register is a non-destructive survey and is to be used as a guide only.

If asbestos containing materials are suspected to be present and have not been previously tested and recorded in the on-site asbestos register, a hygienist (asbestos assessor) sourced from the DoE hygienist panel should be engaged to identify ACMs in the vicinity.

When demolition of buildings and/or structures is to be undertaken or when major refurbishment is to be undertaken, a supplementary asbestos audit with sampling of suspected asbestos containing materials should be carried out. This may involve destructive inspections in order to access materials. The purpose of this audit is to identify all asbestos containing materials for removal / encapsulation prior to demolition / refurbishment being carried out. The audit should also provide information on the location, extent, condition, including friablility, of asbestos containing materials. All building works involving disturbance of ACM will result in updating of the site asbestos register when a clearance certificate is issued at the completion of works.

Please refer to Section 2.3.4 above; and

Please refer to Appendix G for example flowcharts for updating of Register by panel contract hygienist/s.

Asbestos registers produced for DoE sites incorporate a risk assessment process that is embedded and well defined within the Asbestos Register Review Tool (ARRT). This is identical in function to that used for the 2007/2008 survey of facilities that established asbestos registers for DoE.

3.3.2 Risk assessment process

The asbestos risk assessment process entails identifying, evaluating, controlling and monitoring sources of asbestos within buildings or other structures.

The risk assessment also involves consultation with others. Please refer to Appendix F Communications Strategy for details of risk assessment communications.

Asbestos within a building represents a health risk to people only when the asbestos fibres are airborne and are subsequently inhaled.

2 Included as a general reference tool for explanatory purposes and taken from the Code of Practice for the Safe Removal of Asbestos [NOHSC: 2002 (1988)]. The risk to health increases as the number of fibres inhaled increases, ie the health risk is related to the dose, or level of exposure. Dose is a function of the amount, or concentration, of airborne asbestos fibres, and the duration of exposure. Asbestos containing materials that are in a stable matrix, or are effectively encapsulated or sealed, and remain in a sound condition while left undisturbed, represent a negligible asbestos related health risk.

It is necessary to differentiate between 'asbestos hazard' and 'asbestos risk'. 'Hazard' indicates potential for harm, while 'risk' refers to the probability of that harm becoming actual. For example, the presence of asbestos in a building is a hazard, but while that asbestos remains in sound condition and does not release fibres into the air, the risk is negligible. When determining the risk the following factors should be assessed: condition of the asbestos; friability of asbestos containing materials; likelihood of disturbance; exposed surface areas; proximity of air plenums and direct air stream; and environmental conditions. Figure 3.2 shows the likelihood of airborne fibres in disturbed or deteriorated asbestos containing materials.

Figure 3.2 Airborne fibre release risk scale

The inputs to the DoE risk assessment are the:

- 1. Material condition assessment
- 2. Risk status assessment

These are further defined below to ensure uniform application.

Both the above mentioned assessment inputs are given numerical values, which when added, result in the output as a:

1. Remediation Priority, which is a default calculation

The remediation priority is either agreed upon or additional standard / specific comments added, where the assessing factors have not been considered in the inputs.

Figure 3.3 is a flowchart representation of the ARRT risk assessment process.

Higher likelihood of airborne fibres

Asbestos contaminated dust (including dust left in place after past asbestos removal) Sprayed (limpet) coatings / loose fill Lagging and packings (that are not enclosed) Asbestos insulating board Rope and gaskets Millboard and paper Asbestos cement Floor tiles, mastic and roof felt Decorative paints and plasters

Lower likelihood of airborne fibres

Figure 3.2 Airborne fibre release risk scale



Figure 3.3 ARRT Risk assessment process

3.3.2.1 Material condition assessment

The ARRT records the material condition of identified ACM in the following format:

- Good condition, rating of (1), for nonfriable asbestos that is sealed and has no visible damage. This primarily related to asbestos cement (AC) sheet and vinyl tiles.
- Minimal damage, rating of (2), for nonfriable asbestos that has a very small amount of damage, eg hairline cracks.
- Some damage / unsealed, rating of (3), non-friable asbestos with significant breakage or several small areas where material has been damaged, revealing loose asbestos fibres. Non-friable asbestos that is unsealed.
- Poor condition, rating of (4), non-friable asbestos that has extensive damage. Visible asbestos debris.
- Friable asbestos, rating of (5), any occurrence of friable asbestos.

3.3.2.2 Risk status assessment

Asbestos identified by inspections is reported with a risk assessment in the register for each DoE Facility. Each asbestos situation is allocated either a 'High', 'Medium' or 'Low' risk rating to be delivered by a hygienist (asbestos assessor) on-site, taking in to account condition, location, surface treatment and potential friability. The allocation of the risk rating is based on many factors, but is ultimately subjective and relies on the professional experience and competency of the assessor. DoE requires these to be well defined so there is a uniform application of criteria, and this is applied consistently across the DoE portfolio by assessors.

These risk status assessment ratings are defined as follows:

High risk, rating of (3): high potential for fibre release. **Restrict, access and remove.**

As a guide, the material conforms to one, or more, of the following:

- Friable or poorly bonded to substrate (that can readily release fibres), located in accessible areas.
- Asbestos subjected to recurrent abrasion or disturbance.
- Severely water damaged or deterioration likely.
- Friable asbestos material located in air-conditioning ducting.
- Asbestos debris and stored asbestos in reasonably accessible areas.

Medium risk, rating of (2): elevated potential for fibre release. Enclose, encapsulate or seal, reinspect periodically. As a guide, the material conforms to one, or more, of the following:

- Damaged material in accessible area.
- Friable material or poorly bonded substrate, with bonding achievable using appropriate surface treatment.
- Possibility of disturbance through abrasive contact.
- Possibility of deterioration caused by weathering.

Low risk, rating of (1): low potential for fibre release. No Remedial Action, Remove during Refurbishment or Maintenance, Reinspect Periodically.

As a guide, the material conforms to one, or more, of the following:

- Sealed, bonded ACM.
- Firmly bonded to substrate and readily visible for inspection.
- Asbestos debris or stored material in rarely accessed areas.
- Further disturbance or damage unlikely other than during maintenance or service.
- Readily visible for further assessment.
- Stable and damage unlikely, due to isolation or location.

Should materials / products of unknown composition, or materials / products suspected of containing asbestos, be encountered onsite and are not documented in any existing asbestos survey report, including the on-site asbestos register, such as materials / products should be treated as if they were asbestos until sample analysis confirms otherwise.

In the event that additional asbestos is identified, a risk assessment shall then be conducted by a competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel. For example, in the event that demolition or refurbishment works are to be carried out in areas previously not inspected for the presence of asbestos, such as inaccessible wall cavities or beneath floors, an inspection and risk assessment should be performed by a competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel prior to the commencement of the planned demolition / refurbishment works.

3.3.2.3 Remediation priority

The remediation priority is the addition of Material Condition and Risk Status Assessment score as per the selection by the DoE hygienist (asbestos assessor) selected from the panel contract. The remediation priority score is automatically calculated with the following:

- High remediation priority, rating of (6 – 8) – ACM requires immediate removal or complete encapsulation.
- Medium remediation priority, rating of (4 – 5) – ACM requires immediate repair or sealing of surfaces to remediate potential for fibre release.
- Low remediation priority, rating of (2 – 3) – ACM may remain in-situ under the control of an asbestos management plan.

The total added score for the remediation priority will identify the urgency of asbestos material to be remediated or removed.

For example within ARRT, if the asbestos containing materials was determined to be in poor condition (rating of 4) and the risk status was high (risk status score of 3), the material would be determined to be a high remediation priority (ie a Remediation Priority score of 7 [High priority is between 6 and 8]).

Further guidance regarding the use of the ARRT can be found in Appendix G.

3.3.3 Example materials and typical ratings

The 2007/2008 survey and subsequent updates of data have typically rated and actioned the following:

Remediation priority	Typical products	Normal DoE actions
High remediation	AC roofing, friablePipe lagging, friable	All friable ACM products are removed immediately. Being programmed out of school hours, possibly during a school vacation. All known friable ACM removed.
Medium remediation	 AC sheet, badly broken AC sheet, multiple fragments in a space Broken or loose vinyl tiles 	Where badly affected – remove. Where practicable, patch / fix / seal to make serviceable and safe.
Low remediation	 Painted AC sheet Electrical distribution boards Backing board, vinyl tiles 	Maintain by normal processes.

Please note: All high remediation rated priority items were removed by DoE in 2008. Medium remediation items were dealt with within 12 months of the issued registers.

3.4 Record keeping

The DoE Facility Manager shall maintain detailed records of all activities and work permits relating to asbestos works that have been undertaken on the site. The records kept should include:

- DoE Facility asbestos management plan
- DoE Facility hazardous materials on-site (asbestos) register, including updates and amendments; grounds asbestos management plan (if applicable)
- inspection records
- copies of all 'permit to work' documents
- records pertaining to the informing of DoE Facility employees about the presence of asbestos on-site, and that such employees have been appropriately trained in safe work procedures and practices as required
- observations by DoE Facility Manager, entered directly into Asset Management System (AMS)
- records of any asbestos abatement works performed on-site electronically stored in FMweb

 clearance certificates indicating areas are safe to reoccupy after asbestos abatement works.

DoE will engage consultants obtained from the DoE hygienist panel when updating registers. Please refer to Section 2.3.

DoE will retain all asbestos related reports, including all asbestos fibre air monitoring results on the AMS.

Methodology, including flow chart of how to update registers and site details, are found in Appendix G.

3.5 Sampling and labelling

3.5.1 Sampling

All analysis of bulk samples and all airborne fibre monitoring and analysis are to be conducted by a laboratory registered with the National Association of Testing Authorities, Australia (NATA).

Consultants and/or laboratories are to be selected from the DoE hygienist panel.

3.5.2 Labelling

Labelling may be required to clearly identify and provide warning of the presence of asbestos containing materials. Labels should comply with Australian Standards AS1319. Regardless of the labelling system chosen within the facility, all visitors who are about to undertake works on-site are to view the site specific asbestos register.

Examples of standard warning labels are shown below:



Further warning signs and labels can be found in "Appendix B" of the Code of Practice: How to Manage and Control Asbestos in the Workplace.

3.5.2.1 Non-public areas

General Management policy should include the installation of self-adhesive labels or other clear signage in prominent positions on or near asbestos containing materials located in nonpublic areas where maintenance personnel may operate from time-to-time. Such areas typically include plant rooms, ceiling spaces, service ducts and the like. The purpose of such labelling is to immediately bring to the attention of such personnel the presence of asbestos, to avoid the inadvertent mechanical disturbance of the material via maintenance or other works.

3.5.2.2 Public areas

In the teaching and public areas of the DoE Facility, labels are not to be installed.

It is always the intention of DoE to manage all instances of asbestos containing materials in accordance with relevant guidance materials, codes of practices and Australian Standards, and in accordance with this AMP.

Before any work is to commence on-site that may impact upon any structure or involve the disturbance of soils, the persons involved in such works are to consult the relevant building register and asbestos in grounds management plan for the site. It is the responsibility of those persons involved in the proposed project to familiarise themselves with the contents of the registers / asbestos in grounds management plan, to conduct their own risk assessment and perform works in accordance with all known relevant guidance materials, codes of practices, Australian Standards and this AMP.

All asbestos containing materials are to be determined prior to works commencing and not damaged during the works. All such materials are to be removed or managed under appropriate controlled conditions in accordance with all legislative requirements.

All teaching and support staff working on-site are to be inducted onto this AMP and details contained within the registers / asbestos in grounds management plan contained on-site. All staff are to notify the principal immediately of any occurrence of broken building materials, regardless of their perceived asbestos content.

3.6 Occupational exposure standards

It is the aim of the DoE that personal exposure to airborne levels of asbestos is kept sufficiently low to negate medical surveillance.

The exposure standard for airborne asbestos is 0.1f/ml.

DoE aims to maintain exposure of all employees, contractors and the general public to airborne levels considered to be not significantly above that of background and below the lower detection limit for the sampling / analytical method, that being 0.01f/ml.

All monitoring is to be conducted by a hygienist (asbestos assessor) from the DoE hygienist panel in accordance with Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition [NOHSC:3003 (2005)].

It is expected that the only time a level might be obtained above 0.01f/ml is during asbestos removal works, which are to be undertaken by a licensed asbestos removal contractor outside of school hours. In such cases all works will be managed in accordance with How to Safely Remove Asbestos: Code of Practice and NSW Work Health and Safety Regulation 2011.

3.7 Safe work practices

3.7.1 General

Prior to commencing any works on any DoE Facility building, such as demolition, refurbishment or maintenance, the hazardous materials (asbestos) register on-site must be consulted to determine if any known asbestos containing materials / products are present that are at risk of being disturbed.

Please note that the existing register is a nondestructive survey and is to be used as a guide only. If there is any doubt as to the location of asbestos, then an intrusive survey or additional sample collection and analysis is to be organised via the use of the DoE hygienist panel.

If documented asbestos containing materials / products are present in the area and may be impacted upon by the proposed works, the asbestos must be removed/encapsulated under controlled conditions prior to the commencement of any building works. Depending on the nature of the asbestos, abatement options other than removal (such as encapsulation) may be feasible.

If unknown materials / products, or undocumented materials / products suspected of containing asbestos are encountered during building works, such materials / products are to be treated as if they contain asbestos and any work that may impact on that material / product must immediately cease, pending sampling and analysis by a qualified person selected from the DoE hygienist panel. This will allow the DoE to determine what control methods are required.

3.7.2 Importation of material

Imported material such as fill is a possible source of asbestos contamination. No individual or organisation is to be permitted to dump any type of fill on a school site. Fill shall only be brought onto school sites as part of necessary works and must be accompanied by an appropriate validation certificate ensuring that the fill is suitable for use. Please refer to Appendix E for DoE Asset Management Directorate advice on the use of imported fill on school sites.

3.7.3 Permit to work

If it is determined, after consulting the hazardous materials on-site (asbestos) register, that asbestos containing materials or products are present in the vicinity of the planned works, a permit to work authority will need to be issued to, and signed by, the contractor. Permit to work authorities will only be issued by the DoE Facility Manager (refer Appendix A). All asbestos works must be undertaken by an agent of DoE, such as Department of Public Works, following approval from the directorate. All asbestos works are to be undertaken outside of school hours.

Before being issued with a permit to work, individuals will be required to read and understand this AMP as well as copies of relevant hazardous materials on-site (asbestos) registers or asbestos removal control plans or risk assessments prepared by DoE hygienist panel members and held on file on-site or obtained from DoE website/s. Individuals must be aware of their legal obligations in relation to health and safety specified in the NSW Work Health and Safety Act 2011 and the NSW Work Health and Safety Regulation 2011. Where practicable, project personnel should be made aware of the requirements of this AMP prior to tendering to ensure they allow for such requirements when quoting.

Workers engaged in the removal of asbestos and asbestos containing materials will not be issued with a permit to work unless they are employed by a company holding a removal licence issued by WorkCover NSW appropriate for the type of asbestos containing materials concerned.

The permit to work formally places a responsibility for compliance with this AMP and the NSW Work Health and Safety Regulation 2011 on the signatories.

The permit to work is designed to ensure appropriate work practices are employed in the vicinity of asbestos containing materials / products. The permit to work will document what asbestos is to be removed, encapsulated or otherwise protected, prior to the contracted maintenance or building works proceeding. The permit to work will also indicate whether other requirements such as use of personal protective equipment (PPE), the installation of barricading and airborne fibre monitoring are necessary and may provide recommendation for further consultation, sampling or investigation by a member of the DoE hygienist panel prior to permit and contract finalisation.

When a project involves a team of more than one worker, the person in charge of the team will be issued with the permit to work. That person will be responsible to ensure their workers are aware of their responsibilities. That person will also be responsible to ensure that each worker's signature appears on the appropriate section of the permit.

When work is completed, or the permit to work expires (whichever occurs first), the permit shall be signed by the contractor and returned to the DoE Facility Manager to cancel it after ensuring that a safe situation exists. The DoE Facility Manager shall review any documentation provided by the DoE hygienist panel member, such as asbestos air monitoring and clearance inspection certificate/s, and inspect the work area to ensure that it is fit for purpose prior to returning it to normal use. The AMU can provide assistance if required. The DoE Asset Management Directorate shall be advised immediately by any site personnel of any incidents of non-compliance with the AMP that have occurred.

The DoE Facility Manager will maintain a register of all permits to work that have been issued and cancelled.

It will be a condition of engagement of contractors who are required to work onsite that a permit to work be issued and cancelled as required.

The format of the permit to work is illustrated in Appendix A.

3.7.4 Facility site visit log

Each DoE facility is to maintain a Facility Site Visit Log. All visitors to a site who intend to undertake works are to view the asbestos register / asbestos in grounds plan (site specific Asbestos Management Plan) relevant to their proposed works on-site. A copy of the relevant section from the asbestos register / asbestos in grounds management plan is available at DoE facilities. Following a complete review of that information, the visitor is to check the box (highlighted **red** in below image) and sign the Facility Site Visit Log to confirm that they have reviewed the asbestos register and other asbestos related documents.

They are to note that the existing register is a non-destructive survey and is to be used as a guide only.

All contractors are to review details on FMweb during the planning of all works, review this AMP and make all relevant enquiries prior to finalisation of the contract.

Complete one log entry		LITY NAME LITY NO.	Ту	pe of work 1431110
for every site visit.		ATION OF WORK		insurance work
date:	build	ling no. room no.		essential urgent repair
time in:				programmed maintenance work
time out:	Work	done or reason for visit		reactive maintenance
hours worked:	WOIP	Cubie of reason for visit		demountable work
				condition assessment
For insurance work, essential				meeting
urgent repairs, maintenance		estos Register Checked ves no ired when any grounds or building		other
extra task, programmed		disturbance is undertaken)		preventive statutory maintenance
maintenance work or demountable work, also	WAS	THE JOB COMPLETED?		maintenance extra task
complete a Service Report	□у	/es /		school initiated works
	🗆 r	If no, what further action is required?		
	[site visit		
	E	other		
	0	Details		
CONTRACTOR'S COMPANY	N	JAME:		
Contractor's rep./ Visitor	N	Name: signature		
DEC Facility Manger	N	Name: signature		

Facility Site Visit Log

Note: The DoE Facility Manager must check that all entries are legible before signing this log. When this page is complete, send the yellow copies to your Asset Services Officer (AS0). Pink copies go to the contractor.

3.8 Contractor health and safety

Prior to undertaking any work that involves the removal, repair or disturbance of asbestos containing materials, a Safe Work Method Statement (SWMS) will be prepared that defines safe procedures to protect the health and safety of personnel. This statement should include the following measures, as a minimum:

- confirmation of their review of the relevant asbestos register, asbestos removal control plan and other relevant documentation, prior to preparation of the SWMS
- review of risks associated with their possible exposure to asbestos or asbestos containing materials (ACM)
- all workers shall wear appropriate Personal Protective Equipment (PPE) for the work undertaken. This may include protective coveralls, gloves and safety boots
- all workers shall wear appropriate Respiratory Protective Equipment (RPE) for the work undertaken
- Decontamination procedures and measures (if applicable)
- asbestos removal areas and buffer zones
- asbestos air monitoring samples (number and frequency).

In addition,

- a reference to all appropriate licences and insurances held by the contractor should be included
- a reference as an additional safety measure, that all works are to be undertaken outside school hours, should be included. Appropriate measures are to be included regarding this requirement.

The Safe Work Method Statement (SWMS) should be reviewed by the Agent of DoE that engages the contractor as per the requirements of the permit to work.

3.9 Approvals

The following environmental approvals and licences will be required for asbestos work and disposal:

- prior to work being undertaken on a site, a permit is to be obtained from DoE
- contractors who remove, repair or disturb areas of 10m² or more of non-friable asbestos must hold a non-friable or a friable asbestos licence issued by WorkCover NSW
- contractors who remove, repair or disturb friable asbestos material must hold a friable asbestos removal licence issued by WorkCover NSW
- WorkCover NSW must be notified at least five days prior to the commencement of work when 10m² or more of non-friable asbestos containing materials are removed or an amount of friable asbestos containing materials are removed
- the facility that is to receive asbestos waste material would be required to be licensed by the EPA to receive that material subject to the waste classification
- all contractors must hold insurance appropriate for the asbestos work that is to be carried out.

3.10 Awareness training

All friable asbestos removal must have a licensed asbestos assessor to undertake air monitoring and clearance inspections, and issue a clearance certificate if air monitoring levels are <0.01f/ml and visual inspection showing no visible contamination of area and it's surroundings. (Clause 473 and 474 from WHS Regulation 2011).

It is best practice that DoE Asset Management personnel and Facilities Maintenance Contractors who are not likely to be exposed to asbestos but who work in areas where asbestos is, or may be present, be provided with an asbestos awareness training. It is recommended that such training shall include the following:

- overview of asbestos related legislation (State), standards and codes of practice
- information on the presence of asbestos in the DoE Facility buildings and grounds, including the types of asbestos and typical locations where asbestos may be encountered

- information should be provided on the differences between friable and non-friable products
- information on the health risks associated with asbestos
- highlighting the need to avoid avoid disturbing in-situ asbestos containing materials /products
- procedures to be followed in the event damaged or disturbed asbestos containing materials / products are identified, or unknown materials / products or materials / products suspected of containing asbestos are encountered, including the relevant point of contact within the DoE
- information about general methods of asbestos management and removal
- information about air monitoring.

Asbestos awareness training is to be provided by a consultant selected from the DoE hygienist panel.

3.10.1 Hazardous materials

Although not covered by this management plan, the DoE has requirements for the management of hazardous materials other than asbestos. A general overview of DoE hazardous materials management is presented in Appendix E of this document.

4. Control and mitigation measures

4.1 Determination of control measures

In accordance with the SafeWork Australia How to Manage and Control Asbestos in the Workplace: Code of Practice 2011, the following control measures may be adopted:

Leave in-situ (defer action)

The identification of asbestos in a building does not automatically necessitate its immediate removal. Asbestos in a stable condition and not prone to mechanical damage can generally remain in-situ. The asbestos will need to be inspected on a regular basis to ensure its integrity is maintained. Asbestos situations should be labelled with an appropriate warning where required, and must be removed under controlled conditions prior to demolition or refurbishment works that may disturb the asbestos.

Encapsulation or sealing

Encapsulation refers to the coating of the outer surface of the asbestos material by the application of some form of sealant compound that usually penetrates to the substrate and hardens the material. Sealing is the process of covering the surface of the material with a protective coating impermeable to asbestos. Encapsulation or sealing helps protect the asbestos from mechanical damage, and is designed to reduce the risk of exposure by inhibiting the release of asbestos fibres into the airborne environment, and increase the length of serviceability of the product.

The use of encapsulation or sealing may be of limited application. It is not considered to be an acceptable alternative to repairing or removing severely damaged or friable asbestos containing materials.

Enclosure

Enclosure involves installing a barrier between the asbestos material and adjacent areas. This is effective in inhibiting further mechanical damage to the asbestos, and friable products such as calcium silicate pipe lagging or sprayed limpet asbestos may be targeted for enclosure where removal is not an option. The type of barrier installed may include plywood or sheet metal products, constructed as boxing around the asbestos.

Removal

Removal of asbestos must be performed under certain controlled conditions, depending on the type of asbestos product to be removed. Removal is considered preferable to the other abatement options such as enclosure or encapsulation, as it eliminates the hazard from the work place. The removal process, however, does pose an increased risk to personnel engaged in the removal, and may result in increased airborne fibre levels in adjacent occupied areas if the removal program is not strictly controlled. Asbestos removal is generally an expensive exercise, and can cause major disruptions to building occupants.

The removal of asbestos is considered appropriate when the asbestos product is deteriorated, has reached an unserviceable condition, or is at risk of being disturbed, and the other control options are not feasible. Where demolition or refurbishment works are to occur, and this work is likely to impact on asbestos containing materials, the asbestos must be removed under controlled conditions prior to the commencement of any site works.

Where the asbestos is friable and not in a stable condition, and there is a risk to health from exposure, it should be removed as soon as practicable. High risk friable is to be removed as a matter of priority.

Where removal is to occur, a hygienist (asbestos assessor) is to be selected from the DoE hygienist panel, to provide consultancy advice and monitoring prior to, during and after the removal process. An appropriately licensed and insured contractor will be engaged at all times.

Table 4.1 provides a summary of the relative advantages and disadvantages of each control method, as well as situations in which each may be considered appropriate.

Appropriate when	Not appropriate when	Advantages	Disadvantages
Defer			
 Negligible risk of exposure. Asbestos inaccessible and fully contained. Asbestos stable and not liable to damage. 	 Possibility of deterioration or damage. Airborne asbestos dust exceeds recommended exposure standard. 	 No initial cost. Cost of removal deferred. 	 Hazard remains. Need for continuing assessment. Asbestos management program required.
Encapsulate or seal			
 Removal difficult or not feasible. Firm bond to substrate. Damage unlikely. Short life of structure. Readily visible for regular assessment. 	 Asbestos deteriorating. Application of sealant may cause damage to material. Water damage likely. Large areas of damaged asbestos. 	 Quick and economical for repairs to damaged areas. May be an adequate technique to control release of asbestos dust. 	 Hazard remains. Cost for large areas may be near removal cost. Asbestos management system required. Eventual removal may be more difficult and costly.
Enclosure			
 Removal extremely difficult. Fibres can be completely contained within enclosure. Most of surface already inaccessible. Disturbance to, or entry into, enclosure area not likely. 	 Enclosure itself liable to damage. Water damage likely. Asbestos material cannot be fully enclosed. 	 May minimise disturbance to occupants. Provides an adequate method of control for some situations. 	 Hazard remains. Continuing maintenance of enclosure. Asbestos management program required. Need to remove enclosure before eventual removal of asbestos. Precautions necessary for entry into enclosure.
Removal			
 Surface friable or asbestos poorly bonded to substrate. Asbestos is severely water damaged or liable to further damage or deterioration. Located in air-conditioning duct. Airborne asbestos exceeds recommended exposure standard. Other control techniques inappropriate. 	 Located on complex and inaccessible surfaces. Removal extremely difficult and other techniques offer satisfactory alternative. 	 Hazard removed. No further action required. 	 Increases immediate risk of exposure, especially to removal workers. Creates major disturbance in building. Often highest cost, most complex and time consuming method. Removal may increase fire risk within building; substitute required. Possible contamination of whole building if removal done poorly.

5. Asbestos in grounds

NSW Department of Education | Asbestos Management Plan

5.1 General

For procedures to follow when a new instance of asbestos and asbestos containing materials have been found or are suspected to be present, please follow Section 9 Asbestos Incident Procedures, which details procedures to be followed for a series of asbestos scenarios. Section 9.2 refers to incidences of site specific details of already known grounds asbestos issues that are detected in the site specific asbestos containing materials register (asbestos) in DoE Facility grounds.

SafeWork Australia How to Safely Remove Asbestos: Code of Practice states that: *Removal of asbestos from contaminated soil will require a Class A licensed asbestos removalist for any friable asbestos to be removed, or a Class B licensed asbestos removalist if more than 10 m² of non-friable asbestos is to be removed. A person who does not have a licence can remove 10 m² or less of non-friable asbestos. Where there is uncertainty as to whether the amount of nonfriable asbestos is more or less than 10 m², a Class A or Class B licensed asbestos removalist should be engaged.*

Taking the above into consideration, it is DoE policy to engage a Class A licensed asbestos removalist contractor as best practice for all occurrences of asbestos contaminated soil. The contractor will be engaged by an agent of DoE from a panel approved by DoE and all engagements will be to WorkCover NSW guidelines and follow the advice of the competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel to conduct a risk assessment and determine the most appropriate control measures and remediation strategies.

As current legislation permits the removal of less than 10 m² of bonded (non-friable) asbestos containing material (ACMs), trained DoE staff are able to safely remove fragments of ACM. Should DoE Facility staff observe fragments of asbestos cement sheeting on DoE Facility grounds or students in possession of such material, then these materials must be collected immediately and placed into sealed plastic asbestos bags (refer to Section 7.4 for specifications of asbestos bags).

The DoE hygienist panel will provide training for DoE staff, Public Works staff, FMC, Subcontractors (to FMC) and others as needed to ensure samples can be appropriately collected and tested to provide expeditious response to issues as they arise. Please refer to Section 2.3.7 and 3.11.

Alternatively, DoE or its agent is to proceed with the site collection of surface fragments of asbestos cement as soon as practicable by an appropriate contractor. This can often be on the same day as discovery of the material and/or its confirmation as being asbestos containing material (ACM). WorkCover NSW should be contacted on hotline number 1800 672 718 to waive the five (5) day notification period to ensure works are immediately completed.

DoE only undertakes disturbance investigations in buildings and grounds in preparation for construction projects. In these circumstances, such investigations within the building fabric and grounds should be only undertaken using the DoE hygienist panel in the absence of school students and staff. As the primary control method of ACM on DoE sites is by encapsulation (where the ACM is present as a surface layer in the building fabric or grounds) only the surface ACM is sampled, tested or remediated. The taking of soil samples for assessment of sites contaminated with fibro (asbestos cement) fragments is not required, unless disturbance works are planned. Any excavation or planned removal of soil containing ACM must be undertaken with advice provided by a member of the DoE hygienist panel.

5.2 General measures when ACM has been confirmed

Where asbestos containing materials (ACM) have been confirmed, appropriate measures should be undertaken to control the risks.

5.2.1 Surface materials

All visible surface materials should be removed as soon as possible. Asbestos containing materials (ACMs) found on the surface are likely to be in the form of fragments of asbestos cement sheeting. Should DoE Facility staff observe fragments of asbestos cement sheeting on DoE Facility grounds or students in possession of such material, then these materials must be collected immediately and placed into sealed plastic asbestos bags (refer to Section 7.4 for specifications of asbestos bags). The risk to health from handling asbestos cement fragments is considered negligible as the asbestos fibres are bound into the cement matrix and are unlikely to release respirable fibres unless mechanically abraded.

Alternatively, an approved asbestos removal contractor should be engaged by DoE or its agent to perform the clean-up operation (this may be necessary where high-level contamination is evident) as soon as practicable and where friable asbestos removal is required.

5.2.2 ACM in fill materials

When surface asbestos containing materials have been found and fill materials have been used and are evident at the surface, appropriate measures should be undertaken to remove or encapsulate any potential asbestos containing materials, as further asbestos containing materials may possibly be contained within the fill below the surface. Soil erosion may cause these materials to reach the surface. A competent person / asbestos assessor (hygienist) should be selected from the DoE hygienist panel and engaged directly by the DoE or by an agent of DoE to assess the risks posed and to recommend appropriate management techniques to be employed.

Management techniques are required to control the risk of exposure to asbestos fibres. Depending on the situations, one or more of the following strategies may be employed:

- removal of all visible asbestos containing materials at the surface
- enclosure of area to restrict access to students and visitors
- containment of fill materials by means of applying a demarcation barrier such as geo-fabric and/or by applying a surface layer such as mulch or topsoil above contaminated soils
- re-turfing of exposed soils
- encapsulation of fill materials by means of applying a permanent covering such as concrete
- removal of asbestos contaminated soils.

Alternate strategies will be considered by DoE and/or its agent in conjunction with a competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel.

5.2.3 Re-inspections

In order to monitor the effectiveness of onsite management it is essential that the treated area be regularly inspected. A visual inspection of asbestos remedial measures should be carried out to ensure that they are being maintained adequately. Reinspections will be the responsibility of the Principal or site manager. Such inspections should occur on the following occasions:

- at three⁴ monthly intervals (eg a walk over of remediated areas to ensure that applications of mulch, turf, etc have been maintained)
- as part of routine building inspections
- after a period of prolonged heavy rain (eg a walkover of remediated areas to ensure that applications of mulch, turf, etc have not been disturbed by heavy rain)
- whenever damage or disturbance has been reported (eg a walkover of remediated areas to ensure that applications of mulch, turf, etc have not been disturbed by events such as vehicle trafficking).

Should areas of exposed soil or geo-fabric be identified where previous containment has occurred or where encapsulating measures appear to be damaged or are no longer effective, then these areas should be recovered immediately. Some remedial measures, such as added surface layers of mulch and topsoils, will require ongoing maintenance to ensure that a sufficient barrier layer is in place.

5.3 Actions to be taken

5.3.1 New instances of ACM

 Where new instances of asbestos containing materials are suspected of being present in DoE Facility grounds, the DoE AMU must be contacted upon discovery of suspected ACMs to determine actions to be taken.

⁴ Some sites, for example those with no new occurrence of asbestos in the past 5 years, are inspected at 12-monthly intervals and/or as points indicated above.

- Access to the area should be restricted to all students until it is proven that no ACMs are present or until ACMs are removed or appropriately encapsulated (asbestos containment area).
- Samples of suspected materials may be taken by a competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel and submitted to a NATA accredited laboratory for analysis of asbestos fibre content.
- In the absence of analytical results, suspected materials must be assumed to be asbestos containing. Where site investigations (other than that indicated below) are undertaken only the surface level is inspected and determination of remediation requirements should be based upon the inspection and discussion with DoE.
- Please also refer to Section 9.

5.3.2 Encapsulation of soil on-site

- Where a requirement exists as a result of design factors for soil to be disturbed and/ or managed and removed for development or maintenance, a preliminary investigation is to be instigated by DoE or its agent into possible contaminants within the area of intended soil disturbance / removal, utilising existing documentation as a starting point.
- In addition to the review of available site documentation, a preliminary investigation may include a site visit, and in the case of bulk excavation works, a possible below-ground investigation and sampling to the depth required by the bulk excavation works.
- A consultant selected from the DoE hygienist panel may assist in this review of documentation, preliminary investigation and below-ground investigation.
- The above tasks should be undertaken as soon as possible, preferably before any works contract is issued and before subsurface work is commenced.
- Design / development changes may be preferable to avoid soil disturbance, and to mitigate the need for spoil management procedures, additional testing, third party review and unbudgeted waste disposal costs.

- A preferred option for consideration is encapsulation of soil on-site. To encapsulate soil contaminated with ACM in an area onsite, it is recommended to:
- Ensure that the area is isolated in the interim and any potential dust is managed
 - Ensure that a document such as a remedial action plan (RAP) and including an asbestos management plan (AMP) be prepared by a consultant selected from the DoE hygienist panel, detailing the encapsulation method (including comments on suitability for intended land-use, eq car park) and environmental management requirements during implementation (eg dust and noise management). If the selected hygienist (asbestos assessor) requires additional soil expertise, then they are to involve a suitably experienced contaminated land management consultant, preferably from within their own company and known to DoE, with experience gained from DoE sites.
 - Ensure that a permit is received from DoE to commence works.
 - The AMP will determine if the asbestos is friable / non-friable and the extent of impact (lateral and vertical) through selected sampling and analysis.
 - That document is to be submitted along with a permit application to WorkCover NSW by the selected asbestos removal contractor (as the work involves working with asbestos).
 - Notification by DoE to the EPA is to be considered depending on the level of impact.
 - DoE to verify compliance under WH&S Act and Protection of the Environment Operations (POEO) Act.
 - Notification by DoE is to be made to the respective council to allow inclusion on the site s149 certificate (under the NSW EP&A Act, 1997).
 - In addition, the area to be encapsulated is to be documented / surveyed in such a manner to accurately determine location and depth at a later date.

- Upon receipt of both above mentioned permits from DoE and WorkCover NSW, works are to commence, along with asbestos air monitoring by a hygienist (asbestos assessor) selected from the DoE hygienist panel during the encapsulation process.
- Upon completion an inspection is undertaken by the hygienist (asbestos assessor) to confirm activities as detailed within the RAP/AMP have been implemented and providing comment that the land has been remediated / encapsulated to allow for intended use, and a site-management plan is prepared to manage any future subsurface activities that may be required for the site (eg excavation of a trench to install new electricity cables or stormwater).

5.3.3 Possible disturbance or bulk excavation of large volumes of soil

- Where a requirement exists as a result of design factors for large volumes of soil to be disturbed and / or managed and removed as part of a development or maintenance, a preliminary investigation is to be instigated by DoE or its agent into possible contaminants within the area of intended soil disturbance / removal, utilising existing documentation as a starting point.
- As with any asbestos disturbance works, whenever the hygienist assesses it likely asbestos fibres will be released at quantity greater than the detection limit of air monitoring (0.01f/ml) then these works must occur in the absence of staff and students, i.e. outside of school hours, weekends and vacations.
- A preliminary investigation may also include a site visit, and potentially, in the case of bulk excavation works, a below ground investigation and sampling to the depth required by the bulk excavation works.
- A consultant selected from the DoE hygienist panel may assist in this review of documentation, preliminary investigation and below ground investigation.
- The above tasks should be undertaken as soon as possible, preferably before any works contract is issued and before subsurface works commence.

- Consideration should be given to re-design of any works to avoid soil disturbance or to incorporate encapsulation as an option (see 5.3.2 above).
- If works are to go ahead (ie the design cannot be altered and/or encapsulation is not an option) ensure that a document such as a remedial action plan (RAP), including an asbestos management plan (AMP) or asbestos removal control plan (ARCP), be prepared by a consultant selected from the DoE hygienist panel, providing recommendations for the excavation of soil or its disturbance so as to provide for environmental management requirements during implementation (eg dust and noise management). If the selected hygienist (asbestos assessor) requires additional soil expertise, then they are to involve a suitably experienced contaminated land management consultant, preferably from within their own company and known to DoE, with experience gained from DoE sites.
- Consideration is also to be given to the preparation of unexpected finds protocols prior to works commencing by a member of the DoE hygienist panel to assist the contractor undertaking bulk excavation works lessen the risk of airborne asbestos release following the completion of the planned excavation or disturbance works.
- All procedures are to be submitted to DoE and its agent prior to all works commencing.

5.3.4 Limited excavation or disturbance of soils

- Where building works requiring limited excavation or disturbance of soils (including footings) is to occur, an inspection should be undertaken prior to the commencement of works. This may include a site visit with a consultant selected from the DoE hygienist panel, review of available documentation by the selected consultant and potentially, in the case of excavation works, a below ground investigation by the selected consultant to the depth required by the excavation works.
- It may be a result that it is more prudent to alter the design of the intended works to avoid soil disturbance or to incorporate

encapsulation as an option (see 5.3.2 above) than to continue and require spoil management procedures, and additional testing and review.

- Ensure that a document such as a remedial action plan (RAP), including an asbestos management plan (AMP) or asbestos removal control plan (ARCP), be prepared by a consultant selected from the DoE hygienist panel, providing recommendations for the excavation of soil or its disturbance so as to provide for environmental management requirements during implementation (eg dust and noise management). If the selected hygienist (asbestos assessor) requires additional soil expertise, then they are to involve a suitably experienced contaminated land management consultant, preferably from within their own company and known to DoE, with experience gained from DoE sites.
- Consideration is also to be given to the preparation of unexpected finds protocols prior to works commencing by a member of the DoE hygienist panel, to assist the contractor undertaking excavation or disturbance works, following completion of the planned excavation or disturbance works.
- All procedures are to be submitted to DoE and its agent prior to all works commencing.

5.3.5 Importation of material

- No fill should be imported without being tested or certification indicating it is suitable for use on a school facility in accordance with NSW EPA waste and contaminated land guidelines. Generally it is preferable that any imported fill is virgin excavated natural materials (VENM) or excavated natural materials (ENM) as defined in the waste guidelines.
- If fill is to be imported onto a school site, the principal should contact their local Regional Asset Management Unit to obtain advice on suitable sources of supply and any documentation required. DoE Memorandum DN/06/00362 offers Asset Management Directorate advice on the use of imported fill on school sites and is included in Appendix E of this document.

6. Asbestos in buildings

6.1 General

All DoE Facilities were surveyed for FMCs from October 2007 – May 2008 after which an initial asbestos register was issued to all schools.

All DoE asbestos registers and this AMP are available to the community generally via the internet at <u>www.dec.nsw.gov.au/about-us/</u> <u>supplying-to-us/asbestos-register</u>, with the most up-to-date information available internally on the DoE Asset Management System (AMS).

The management of in-situ asbestos is important to ensure asbestos containing materials and other non-friable (formerly known as bonded) asbestos products are not damaged or allowed to deteriorate to such an extent that DoE Facility staff, students, contractors or visitors are unnecessarily exposed to airborne asbestos fibres. Asbestos that has been incorporated into a stable matrix (ie non-friable) and that remains in a good condition with no production of airborne dust presents a negligible health risk.

For procedures to follow when asbestos and asbestos containing materials have been found or are suspected to be present in buildings, please follow Section 9 Asbestos Incident Procedures, which details procedures to be followed for a series of asbestos scenarios. Section 9.3 refers to incidences of asbestos in DoE Facility buildings.

The requirements of the contractor site induction and permit to work system (refer Section 3.8.3) will aid in the management of in-situ asbestos containing materials.

No work is to commence on 'assumed' asbestos. Testing of the material is to occur and results known prior to commencing works. As per Section 9, this is to be organised by DoE and/or its agent and the use of the DoE hygienist panel.

SafeWork Australia How to Safely Remove Asbestos: Code of Practice states that: Removal of asbestos will require a Class A licensed asbestos removalist for any friable asbestos to be removed, and a Class A or a Class B licensed asbestos removalist if more than 10 m² of non-friable asbestos is to be removed. A person who does not have a licence can remove 10 m² or less of non-friable asbestos. Where there is uncertainty as to whether the amount of non-friable asbestos is more or less than 10 m², a Class A or Class B licensed asbestos removalist should be engaged.

Taking the above into consideration, it is DoE policy to engage the appropriate contractor for each project requiring the removal of asbestos. The contractor will be engaged by an agent of DoE from a panel approved by DoE and all engagements will be to WorkCover NSW guidelines and follow the advice of the competent person / asbestos assessor (hygienist) engaged from the DoE hygienist panel by an agent of DoE.

The competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel is to conduct a risk assessment to determine the most appropriate control measures and remediation strategies prior to the selection of the class of asbestos removal contractor and asbestos removal works getting underway.

6.2 Actions to be implemented

An up-to-date hazardous materials on-site asbestos register is maintained by the DoE Facility. When required, the DoE and/or its agent will conduct a visual inspection of all asbestos containing materials as part of the condition assessment process to record the status and condition of these materials. Changes in condition will be recorded in the on-site asbestos register, which will be made available to site managers as electronic files.

A condition assessment may be conducted, for example by a Facility Manager. The Facility Manager is to inspect for building materials that are damaged or could be easily disturbed. It should be mentioned that this is not a survey, but simply an inspection of the fabric of the building looking for damage. If damage is found, and the material is known to contain asbestos or the Facility Manager is not sure, then the Facility Manager is to contact their AMU.

Please note that the existing register is a non-destructive survey and is to be used as a guide only.

A site specific management plan will be prepared by DoE and/or its agent to identify specific actions to be taken and those responsible. The visual inspections shall provide management recommendations for asbestos containing materials. As previously mentioned in Section 3.4, a priority rating system for control recommendations provides three ratings for managing asbestos. These are as follows:

High risk: restrict access and remove

As a guide, the material conforms to one, or more, of the following:

- Friable or poorly bonded to substrate, located in accessible areas.
- Asbestos subjected to recurrent abrasion or disturbance.
- Severely water damaged or deterioration likely.
- Friable asbestos material located in air-conditioning ducting.
- Asbestos debris and stored asbestos in reasonably accessible areas.

Medium risk: enclose, encapsulate or seal, re-inspect periodically

As a guide the material conforms to one, or more, of the following:

- Damaged material.
- In reasonably accessible area.
- Friable material or poorly bonded substrate, with bonding achievable.
- Possibility of disturbance through contact.
- Possibility of deterioration caused by weathering.

Low risk: no remedial action, remove during refurbishment or maintenance, reinspect periodically

As a guide, the material conforms to one, or more, of the following:

- Firmly bonded to substrate and readily visible for inspection.
- Asbestos debris or stored material in rarely accessed areas.
- Further disturbance or damage unlikely other than during maintenance or service.
- Readily visible for further assessment.
- Stable and damage unlikely.

6.2.1 Re-inspections

Re-inspections of ACM remaining on-site are to be conducted by a competent person / asbestos assessor (hygienist) to determine the condition of the material. Such re-inspections will comprise a visual assessment of the condition of the materials to determine whether the material remains in a satisfactory condition, or if deterioration has occurred since the previous inspection. Such re-inspections will determine if any remedial action, such as encapsulation, isolation or removal of the asbestos containing materials, is required. Re-inspections of asbestos containing materials will be performed in accordance with the SafeWork Australia: How to Manage and Control Asbestos in the Workplace: Code of Practice 2011 (however as per DoE policy re-inspections should be undertaken every 12 months where a risk assessment indicates the need for reinspection). DoE will carry out this inspection as part of the normal annual condition assessment of the school and incorporate other details held centrally, eg demountable buildings on-site at any given time.

Normally, re-sampling of materials / products would not be required during re-inspections. If, however, previously unidentified or undocumented asbestos, or materials / products suspected of containing asbestos, are encountered during the re-inspection process, sampling and analysis may need to be performed by a hygienist (asbestos assessor) selected from the DoE hygienist panel. If so, once the results of sampling have been received by DoE, the asbestos register will be updated and re-issued by a competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel. Please refer to Appendix J.

6.2.2 Damage to ACM

If accidental damage occurs to any asbestos containing material (ACM) that is likely to produce fibres during the course of day-to-day DoE Facility activities, DoE staff shall organise for all students and staff to immediately vacate the room / area. The Facility Manager shall be immediately informed, who shall contact the DoE Asset Management Unit to seek advice.

A course of remedial action will be determined, including any clean-up. The Incident Response plan should be followed in these situations (refer Section 9). Section 9.3.4 sets out appropriate responses to the discovery of damaged asbestos containing materials.

Should asbestos containing materials become fire damaged, the DoE and/or its agent shall utilise the DoE hygienist panel and arrange for inspections by a competent person / asbestos assessor (hygienist) and subsequent removal of materials by appropriate approved asbestos removal contractors. Any fire damaged buildings must be barricaded off. Section 9.3.9 sets out appropriate responses to the event of asbestos containing materials becoming fire damaged.

Asbestos containing materials that have become fire damaged are classified as friable asbestos by WorkCover NSW, and as such will require removal by a suitably Class A licensed contractor.

Asbestos air monitoring is to be undertaken by a company selected from the DoE hygienist panel who is NATA accredited for asbestos air monitoring and is to be conducted in instances where ACMs have become damaged or where assistance is required in determining airborne exposure and risk to building occupants.

7. Asbestos removal

NSW Department of Education | Asbestos Management Plan

7.1 General

A detailed and site specific work scope and technical specification will be developed by an agent of DoE, such as DPWS, prior to the removal of ACMs from any DoE Facility buildings and grounds. The removal of ACMs shall be performed by a licensed asbestos removal contractor selected from the DoE hygienist panel (ie the appropriate licence for the removal of asbestos issued by WorkCover NSW).

Please note, any work that involves disturbing asbestos must be administered by DPWS.

SafeWork Australia How to Safely Remove Asbestos: Code of Practice states that: *Removal of asbestos will require a Class A licensed asbestos removalist for any friable asbestos to be removed, and a Class A or a Class B licensed asbestos removalist if more than 10 m² of non-friable asbestos is to be removed. A person who does not have a licence can remove 10 m² or less of nonfriable asbestos. Where there is uncertainty as to whether the amount of non-friable asbestos is more or less than 10 m², a Class A or Class B licensed asbestos removalist should be engaged.*

Taking the above into consideration, it is DoE policy to engage a Class A licensed contractor as best practice for all occurrences of asbestos contaminated soil. The contractor will be engaged by an agent of DoE from a panel approved by DoE and all engagements will be according to SafeWork Australia guidelines and follow the advice of the hygienist / competent (asbestos assessor) person engaged from the DoE hygienist panel.

7.2 Asbestos in grounds general removal procedures

All work carried out that involves disturbance of ACMs (including removal) must be administered by DPWS.

All removals are to be undertaken according to:

- NSW Work Health and Safety Act 2011
- NSW Work Health and Safety Regulation 2011
- How to Manage and Control Asbestos in the Workplace: Code of Practice 2011

- How to Safely Remove Asbestos: Code of Practice 2011
- Other relevant documentation issued from time-to-time by WorkCover NSW, EPA or SafeWork Australia.
- NSW DOEC (EPA) Waste Classification Guidelines, Part 1: Waste Classification Guidelines 2009.

Follow the advice of the hygienist / competent (asbestos assessor) person engaged from the DoE hygienist panel to conduct a risk assessment and determine the most appropriate control measures and remediation strategies prior to asbestos removal works getting underway.

Several examples of common circumstances involving soil and ACM have been determined. For each of those circumstances, the following procedures should be followed:

7.2.1 Sparrow-picking of ACM fragments

- Following the determination of the area affected by fragments of ACMs by a competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel and approval to commence works from DoE, a permit will be issued to DPWS to engage a friable licensed asbestos contractor.
- It is likely that fragments of ACM are in the form of asbestos cement sheeting (ACS), bituminous membrane or vinyl tile.
- The asbestos removal contractor approved by DoE is engaged to sequentially and systematically travel across each area and remove all instances of fragments of potential ACM from exposed ground surfaces.
- All works are to require asbestos air monitoring provided by a hygienist selected from the DoE hygienist panel.
- All works are to require a clearance inspection undertaken by a hygienist selected from the DoE hygienist panel following the completion of the asbestos removal works.
- All documentation, including licences, air monitoring, clearance inspections and tipping dockets, is to be provided to DoE.

• All records are to be updated. Please refer to Appendix G.

7.2.2 Encapsulation of soil containing ACM on-site

- Ensure that the area is isolated in the interim and any potential dust is managed.
- Ensure that a document such as a remedial action plan (RAP), including a site specific asbestos management plan (SSAMP) is prepared or updated by a competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel, detailing the encapsulation method (including comments on suitability for intended land use, eg car park) and environmental management requirements during implementation (eg, dust and noise management). If the selected hygienist requires additional soil expertise, then they are to involve a suitably experienced contaminated land management consultant, preferably from within their own company and known to DoE, with experience gained from DoE sites.
- Ensure that a permit is received from DoE to commence works.
- The AMP will determine if the asbestos is friable / non-friable and the extent of impact (lateral and vertical) through selected sampling and analysis.
- That document is to be submitted to WorkCover NSW, along with a permit application to WorkCover NSW by the selected asbestos removal contractor.
- DoE to obtain written approval from EPA before work permit is granted by DoE.
- DoE to verify compliance under WH&S Act and POEO Act.
- Notification by DoE is to be made to the respective council to allow inclusion on the site s149 certificate (under the NSW EP&A Act, 1997).
- In addition, the area to be encapsulated is to be documented / surveyed in such a manner to accurately determine location and depth at a later date.
- Upon receipt of both above mentioned permits from DoE and WorkCover NSW, works are to commence, along with

asbestos air monitoring by a hygienist selected from the DoE hygienist panel during the encapsulation process.

Upon completion an inspection is undertaken by the hygienist consultant to confirm activities as detailed within the RAP/AMP have been implemented and providing comment that the land has been remediated / encapsulated to allow for intended use and a site management plan is prepared to manage any future subsurface activities that may be required for the site (eg excavation of a trench to install new electricity cables or stormwater).

7.2.3 Excavation of soil containing ACM from site

The preferred method is encapsulation of soils on-site (hence its repeat inclusion above), however if excavation and removal of soils from site becomes necessary, then the following is to be implemented as a general guide:

- Ensure that the area is isolated in the interim and any potential dust is managed.
- Ensure that a document such as a remedial action plan (RAP) including an asbestos removal control plan (ARCP) is prepared by a competent person / asbestos assessor (hygienist) selected from the DoE hygienist panel providing recommendations for the excavation of soil so as to provide for environmental-management requirements during implementation (eg dust and noise management). If the selected hygienist requires additional soil expertise, then they are to involve a suitably experienced contaminated land management consultant, preferably from within their own company and known to DoE, with experience gained from DoE sites.
- Ensure that a permit is received from DoE to commence works.
- The ARCP will determine if the asbestos is friable / non-friable.
- That document is to be submitted to WorkCover NSW, along with a notification to WorkCover NSW by the selected asbestos removal contractor.
- Upon receipt of both above mentioned permits from DoE and WorkCover NSW, works are to commence, along with

asbestos air monitoring by a hygienist selected from the DoE hygienist panel during the encapsulation process.

Upon completion of soil removal (that portion contaminated with ACM), an inspection is undertaken by the hygienist consultant to confirm activities as detailed within the RAP/ARCP have been implemented and providing comment that those works have been completed in respect to asbestos contamination to a satisfactory level to allow for the next stage of works to commence. The site management plan (inclusive of a possible unexpected finds protocol) continues to be followed to manage any future occurrence of subsurface ACM that may be exposed during the excavation of soils on-site.

Following the investigation, the material should be classified in accordance with NSW EPA Waste Classification Guidelines, Part 1: Waste Classification Guidelines (2009), and taken to an approved landfill site that is licensed to receive waste relevant to its classification.

7.3 Asbestos in buildings general removal procedures

All work carried out that involves disturbance of ACMs (including removal) must be supervised by an agent of DoE, such as DPWS.

All removals are to be undertaken according to:

- NSW Work Health and Safety Act 2011
- NSW Work Health and Safety Regulation 2011
- How to Manage and Control Asbestos in the Workplace: Code of Practice 2011
- How to Safely Remove Asbestos: Code of Practice 2011
- Other relevant documentation issued from time-to-time by WorkCover NSW or SafeWork Australia

Follow the advice of the competent person / asbestos assessor (hygienist) engaged from the DoE hygienist panel to conduct a risk assessment and determine the most appropriate control measures and remediation strategies prior to the selection of the class of asbestos removal contractor and asbestos removal works getting underway.

Several examples of common circumstances involving the removal of non-friable (bonded) ACM in buildings have been determined and for the majority of instances a Class B contractor may be utilised, unless a risk assessment determines the need for a Class A removalist (except for asbestos containing vermiculite that is friable, and will always require a Class A removalist).

For each of those circumstances, the following steps or bullet-points (excluding major removal works or working at heights) should be followed.

As mentioned previously, in all instances, the above mentioned documents are to be followed and implemented.

Please note however that the following steps or bullet-points are general in nature, and are not to be considered to alter or modify guidelines as set down in the SafeWork Australia Code of Practice titled: How to Manage and Control Asbestos in the Workplace: Code of Practice 2011, or the requirements laid down under all relevant NSW Legislation.

7.3.1 Asbestos containing electrical mounting boards

- If possible the work should be done out of hours to minimise the risk of personnel coming into contact with asbestos removal works
- The work area is to be barricaded off with barrier tape and asbestos warning signs for a minimum distance of 10 metres around the work area
- Select PPE all persons in the asbestos removal area should wear disposable coveralls and a P2 respirator as minimum protection. PPE such as gloves and safety footwear is also recommended. A risk assessment is recommended to ensure adequate PPE is provided
- Prior to commencement a qualified electrician shall isolate any electrical supply and disconnect any electrical fittings that will be affected by the works.
- Every effort shall be made to minimise the generation of dust:

- plastic drop sheets of 200 µm thickness are to be placed in areas where the electrical mounting boards will be removed; and
- components should not be removed where possible and disposed of as asbestos waste. Where a component is to be reused it is to be adequately Decontaminated before it is reused.
- Asbestos containing electrical mounting boards should be sealed in 200 µm plastic, or placed in approved asbestos waste bags and sealed for disposal off-site in accordance with requirements of the regulatory authority. Disposal receipts must be returned to the DoE AMU to verify correct disposal of asbestos waste
- Surfaces adjacent to the electrical mounting board removal shall be vacuumed using an approved asbestos vacuum cleaner fitted with a Class H HEPA filter as per Australian Standard AS/NZS 60335.2.69 or its equivalent
- All potentially contaminated PPE and tools should either be appropriately Decontaminated or disposed of as asbestos waste in approved asbestos waste bags.

7.3.2 Asbestos containing fire doors

- If a risk assessment by a hygienist selected from the DoE hygienist panel determines that a licensed friable asbestos removal contractor is required, then a licensed-friable asbestos removal contractor must be engaged to complete the removal works.
- If possible the work should be done out of hours to minimise the risk of personnel coming into contact with asbestos removal works
- The work area is to be barricaded off with barrier tape and asbestos warning signs for a minimum distance of 10 metres around the work area
- Select PPE all persons in the asbestos removal area should wear disposable coveralls and a P2 respirator as minimum protection. PPE such as gloves and safety footwear is also recommended. A risk assessment is recommended to ensure adequate PPE is provided

- Every effort shall be made to minimise the generation of dust:
 - plastic drop sheets of 200 µm thickness are to be placed in areas where the asbestos fire doors will be removed
 - doors should be removed as a whole where possible and hinges removed from the door frame to avoid any possible disturbance of core material
 - any damaged areas exposing core materials should be sealed prior to removal
 - door handles and locks should not be removed where possible and disposed of as asbestos waste. Where door hardware is to be reused, cavities should be sealed and hardware adequately Decontaminated before it is reused.
- Asbestos containing fire doors should be wrapped in 200 µm plastic and sealed with duct tape. Disposal receipts must be returned to the DoE AMU to verify correct disposal of asbestos waste
- Surfaces adjacent to the fire door removal shall be vacuumed using an approved asbestos vacuum cleaner fitted with a Class H HEPA filter as per Australian Standard AS/NZS 60335.2.69 or its equivalent
- All potentially contaminated PPE and tools should either be appropriately Decontaminated or disposed of as asbestos waste in approved asbestos waste bags.

7.3.3 Asbestos containing mastic

Reference is to made to Window Asbestos Mastic Procedure – NSW Schools Demountable February 2015.

- If possible the work should be done out of hours to minimise the risk of personnel coming into contact with asbestos removal works
- The work area is to be barricaded off with barrier tape and asbestos warning signs for a minimum distance of 10 metres around the work area
- Select PPE all persons in the asbestos removal area should wear disposable coveralls and a P2 respirator as minimum
protection. PPE such as gloves and safety footwear is also recommended. A risk assessment is recommended to ensure adequate PPE is provided;

 If mastic is found to be present on the glass pane, the glass is to be placed within 200 µm thick polythene bags and sealed for disposal as asbestos waste.

If the glass is found to be free of mastic or if the mastic can be removed cleanly then the glass pane can be disposed of or recycled as normal.

- An airless spray should be used to wet the asbestos mastic with a mix of water and wetting agent such as detergent, prior to attempting its removal.
- The remaining mastic within the frame is to be scraped out with the use of hand tools such as scrapers, screwdrivers or chisels.

Note: No power tools are to be used during any mastic removal.

- Mastic is to be removed as far as reasonably practicable. It is understood that corrugations are present within the aluminium frame, which may prevent the removal of all of the mastic. It is expected that residual mastic will remain within the frame; however every effort should be made to remove as much mastic as reasonably practicable prior to the installation of the new window pane. A note to this effect should be placed on the certificate of works as detailed within Appendix A of the above procedure.
- The frame and tools are to be cleaned with wet rags. If the rags are unable to remove the residual mastic a solvent may be utilised.
- The mastic removed along with rags and any debris and dust are to be placed within 200 µm thick polythene bags for disposal as asbestos waste.
- Any debris or dust generated during the removal process must be removed via wet wiping, and drop sheets are to be rolled onto themselves and placed within the 200 µm thick polythene bags for disposal as asbestos waste.
- Following the installation of the new glass pane the edges of the window frame are

to be sealed with non-asbestos mastic to ensure the remaining asbestos mastic is enclosed and cannot be accessed during normal activity in the area.

 At the conclusion of all works the area is to be Decontaminated of all dust and debris with the use of wet wipes to ensure the area is clean and free of dust prior to allowing students and staff to return.

7.3.4 Asbestos cement pipe

- If possible the work should be done out of hours to minimise the risk of personnel coming into contact with asbestos removal works
- The work area is to be barricaded off with barrier tape and asbestos warning signs for a minimum distance of 10 metres around the work area
- Select PPE all persons in the asbestos removal area should wear disposable coveralls and a P2 respirator as minimum protection. PPE such as gloves and safety footwear is also recommended. A risk assessment is recommended to ensure adequate PPE is provided
- Adequate WorkCover NSW approved working platforms, scaffolds, etc should be arranged for any work at height
- Every effort shall be made to minimise the generation of dust:
 - plastic drop sheets of 200 µm thickness are to be placed below the areas from which the asbestos sheeting is to be removed
 - where applicable, seal off the area from other areas. This includes isolating such items as air inlets, exhaust flues and sealing openings with 200 µm thick plastic.
- Asbestos cement pipes should be sprayed with an encapsulated or wetted prior to removal. High pressure water jets shall not be used
- The asbestos cement pipe should be removed in sections by breaking the collars with hand tools. Where this is not practical and the pipe requires cutting then this shall be done by hand tools

- Power tools should not be used, with the exception of removing fasteners
- Asbestos cement pipe sections should be removed with minimum breakage and should be lowered to the ground or floor and not dropped
- Asbestos cement pipe and/or debris shall be placed in approved asbestos waste bags, or a plastic lined industrial waste bin, and sealed for disposal off-site in accordance with requirements of the regulatory authority. Disposal receipts must be returned to the DoE AMU to verify correct disposal of asbestos waste
- Surfaces behind and adjacent to the asbestos cement pipe removed shall be vacuumed using an approved asbestos vacuum cleaner fitted with a Class H HEPA filter as per Australian Standard AS/NZS 60335.2.69 or its equivalent, and asbestos cement residues removed from screws, nail heads and adjacent surfaces, etc
- Damaged edges of asbestos cement pipes shall be sealed with an approved encapsulating paint
- All contaminated PPE and tools should either be appropriately Decontaminated or disposed of as asbestos waste in the manner described above.

7.3.5 Asbestos containing putty

Reference is to be made to Window Asbestos Putty Procedure – NSW School Buildings February 2015.

- If possible the work should be done out of hours to minimise the risk of personnel coming into contact with asbestos removal works
- The work area is to be barricaded off with barrier tape and asbestos warning signs for a minimum distance of 10 metres around the work area
- Select PPE all persons in the asbestos removal area should wear disposable coveralls and a P2 respirator as minimum protection. PPE such as gloves and safety footwear is also recommended. A risk assessment is recommended to ensure adequate PPE is provided
- If putty is found to be present on the glass pane, the glass is to be placed within 200

 μm thick polythene bags and sealed for disposal as asbestos waste. If the glass is found to be free of putty or if the putty can be removed cleanly then the glass pane can be disposed of or recycled as normal

- An airless spray should be used to wet the asbestos putty with a mix of water and wetting agent, such as detergent, prior to attempting its removal
- The remaining putty within the frame is to be scraped out with the use of hand tools such as scrapers, screwdrivers or chisels.

Note: No power tools are to be used during any putty removal.

- Putty is to be removed as far as reasonably practicable. It is understood that corrugations may be present on the frame, which may prevent the removal of all of the putty. It is expected that residual putty will remain within the frame; however every effort should be made to remove as much putty as reasonably practicable prior to the installation of the new window pane. A note to this effect should be placed on the certificate of works detailed within Appendix A of the above procedure
- The frame and tools are to be cleaned with wet rags. If the rags are unable to remove the residual putty a solvent may be utilised
- The putty removed along with rags and any debris and dust are to be placed within 200 µm thick polythene bags for disposal as asbestos waste
- Any debris or dust generated during the removal process must be removed via wet wiping and drop sheets are to be rolled onto themselves and placed within the 200 µm thick polythene bags for disposal as asbestos waste
- Following the installation of the new glass pane the edges of the window frame are to be sealed with non-asbestos putty to ensure the remaining asbestos putty is enclosed and cannot be accessed during normal activity in the area
- At the conclusion of all works the area is to be Decontaminated of all dust and debris with the use of wet wipes to ensure the area is clean and free of dust prior to allowing students and staff to return.

7.3.6 Asbestos cement sheeting

- If possible the work should be done out of hours to minimise the risk of personnel coming into contact with asbestos removal works
- The work area is to be barricaded off with barrier tape and asbestos warning signs for a minimum distance of 10 metres around the work area
- Select PPE all persons in the asbestos cement removal area should wear disposable coveralls and a P2 respirator as minimum protection. PPE such as gloves and safety footwear is also recommended. A risk assessment is recommended to ensure adequate PPE is provided
- Prior to commencement a qualified electrician shall isolate any electrical supply and disconnect any electrical fittings that will be affected by the works
- Adequate compliant working platforms, scaffolds, etc should be arranged for any work at height
- Every effort shall be made to minimise the generation of dust:
 - plastic drop sheets of 200 µm thickness are to be placed below the areas from which the asbestos sheeting is to be removed
 - where applicable, seal off the area from other areas. This includes isolating such items as air inlets, exhaust flues and sealing openings with 200 µm thick plastic.
- Asbestos cement sheets should be sprayed or wetted prior to removal of screw or nails. High pressure water jets shall not be used
- Power tools should not be used, with the exception of removing fasteners
- Asbestos cement sheets should be removed with minimum breakage and should be lowered to the ground or floor and not dropped
- Asbestos cement sheet and/or debris shall be placed in approved asbestos waste bags, or a plastic lined industrial waste bin, and sealed for disposal off-site in accordance

with requirements of the regulatory authority. Disposal receipts must be returned to the DoE AMU to verify correct disposal of asbestos waste

- Surfaces behind and adjacent to the asbestos cement sheet removed shall be vacuumed using an approved asbestos vacuum cleaner fitted with a Class H HEPA filter as per Australian Standard AS/NZS 60335.2.69 or its equivalent, and asbestos cement residues removed from screws, nail heads and adjacent surfaces, etc
- Damaged edges of asbestos cement sheeting shall be sealed with an approved encapsulating paint
- All contaminated PPE and tools should either be appropriately Decontaminated or disposed of as asbestos waste in the manner described above.

7.3.7 Asbestos containing sprayed vermiculite ceiling coating

- If work is to be carried out in an affected room that will disturb or potentially disturb the vermiculite material, the contractor, maintenance person, DoE Facility Manager, agent of DoE, Facilities Maintenance Contractor or other authorised person must engage a specialist asbestos removal contractor who holds a friable asbestos licence to undertake the work
- The licensed contractor or other competent person should prepare an Asbestos removal Control Plan (ARCP) and Safe Work method statement (SWMS) detailing procedures in accordance with above mentioned documentation. Each document is to be followed in such a manner that ensures personnel working in the affected room and any other person within the school will not be exposed to asbestos fibres. The work area must be completely enclosed and work must be undertaken out of school hours
- Work in progress asbestos air monitoring is to be carried out by a hygienist (asbestos assessor) during any work that disturbs or potentially will disturb the vermiculite material
- On completion of the asbestos work and following an inspection and subsequent certification by a hygienist licensed

(asbestos assessor) of the cleanliness of the work area and the enclosure, all surfaces must be sealed with PVA, applied by means of airless spray equipment. Prior to commencing clearance asbestos monitoring, the hygienist shall inspect all internal surfaces within the asbestos removal area to verify adequate coverage of the PVA (where accessible). PVA adhesive should be mixed with a water based paint or other appropriate colour to ensure that the PVA application is visible where applied

- Clearance asbestos air monitoring is to be carried out after a successful clearance inspection and application of PVA. Results of clearance air monitoring must be comparable to background levels and must be obtained before the area can be released for re-occupation
- All asbestos management measures originally installed must be re-instated at the completion of work and prior to the removal of the work area enclosure, unless all vermiculite material has been removed
- Air monitoring should be in accordance with the WorkCover NSW How to Safely Remove Asbestos: Code of Practice 2011, NSW Work Health and Safety Regulation 2011, National Occupational Health & Safety Commission's Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres [NOHSC:3003 (2005)] and be conducted by an asbestos assessor from the DoE hygienist panel

7.3.8 Asbestos vinyl tiles

- If a risk assessment by a hygienist selected from the DoE hygienist panel determines that a friable licensed asbestos removal contractor is required or if friable backing material is found to be present, then a friable licensed asbestos removal contractor must be engaged to complete the removal works
- If possible the work should be done out of hours to minimise the risk of personnel coming into contact with asbestos removal works
- The work area is to be barricaded off with barrier tape and asbestos warning signs for a minimum distance of 10 metres around the work area

- Select PPE all persons in the asbestos removal area should wear disposable coveralls and a P2 respirator as minimum protection. PPE such as gloves and safety footwear is also recommended. A risk assessment is recommended to ensure adequate PPE is provided
- Any form of removal such as scraping, chipping or the use of a wide bladed tool may be used although every effort shall be made to minimise the generation of dust
- Where a heat source is used to soften adhesive beneath the vinyl tile, such equipment should not be used to burn the tile due to possible toxic substance release and the fire hazard
- Asbestos containing vinyl tiles and/or debris shall be place in approved asbestos waste bags or on plastic lined industrial waste bin, and sealed for disposal offsite in accordance with requirements of the regulatory authority. Disposal receipts must be returned to the DoE AMU to verify correct disposal of asbestos wastet
- All floor and adjacent surfaces shall be vacuumed after removal using an approved asbestos vacuum cleaner fitted with a Class H HEPA filter as per Australian Standard AS/ NZS 60335.2.69 or its equivalent
- Wet wiping of adjacent surfaces is also recommended
- All potentially contaminated PPE and tools should either be appropriately Decontaminated or disposed of as asbestos waste in approved asbestos waste bags.

7.4 Asbestos waste management

7.4.1 ACM – general

Normally, disposal of ACMs / products will be the responsibility of the contractor engaged to perform any asbestos abatement works. The disposal of any asbestos containing materials / products off site will be in accordance with the applicable SafeWork Australia Code of Practice, local authority and legislative requirements.

Asbestos waste such as pipe lagging, limpet or fragments of asbestos cement sheeting shall be double bagged prior to its removal from site, using 200 µm thick polyethylene bags. Asbestos waste shall be bagged once at the workface and a second time away from the workface but prior to leaving the removal area enclosure. It is recommended that a maximum bag size of 1200 millimetres (length) x 900 millimetres (width) be used. Bags should be filled to no more than 50% capacity, and contents should be wet before sealing. Consistent with good manual handling practice, bags should not exceed 16 kilograms in weight.

As such:

- All ACMs removed or ACM must be either wrapped and sealed within 200 µm thick polythene or placed within a 200 µm polythene bag which is no longer than 1200 mm and no wider than 900mm wide
- Bags containing waste are to be sealed with duct tape via the goose neck method and placed and sealed within another 200 µm polythene bag for transport to an appropriate waste disposal facility licensed to accept asbestos waste
- Alternatively, other approved containers may be used. In the case of non-friable materials such as large sheets of asbestos cement, such materials can be placed into a plastic lined industrial waste bin or like container
- Polythene sheeting parcels are to be wrapped additionally within 200 µm thick polythene sheeting for transport to an appropriate waste disposal facility licensed to accept asbestos waste.

Each bag or container shall be labelled on its outermost surface, with the following warning statement:

Caution – asbestos waste

Avoid creating dust

Serious inhalation health hazard

Transport and final disposal of asbestos waste material shall be carried out in a manner that will prevent the liberation of asbestos dust to the atmosphere. All asbestos waste material shall be buried at an approved landfill site and in a manner approved by the local and state authorities. The DoE, prior to payment of invoices, must receive copies of waste disposal receipts, as provided by the approved landfills.

7.4.2 Soil contaminated with ACM

A waste classification investigation is required to be undertaken on all soil determined as being for off-site disposal, including asbestos impacted fill.

The investigation involves the collection of soil samples for the purpose of determining the waste classification of the fill material prior to its removal and disposal. The samples may need to be analysed for other compounds, such as hydrocarbons, metals and pesticides, depending on the site history.

Following the investigation, the material should be classified in accordance with NSW DoE Waste Classification Guidelines, Part 1: Waste Classification Guidelines (2009), and taken to an approved landfill site that is licensed to receive waste relevant to its classification.

7.5 Project supervision

Prior to the removal of any asbestos, a competent person / asbestos assessor (hygienist) obtained from the DoE hygienist panel, with experience in asbestos abatement works, shall be engaged by DoE or its agent to work independently of the DoEapproved asbestos removal contractor to provide asbestos air monitoring and clearance inspection services. Depending on the nature of the work, a competent person / asbestos assessor (hygienist) from the DoE hygienist panel may also be engaged to oversee the removal of asbestos products, staying on-site for the majority of the duration of asbestos-removal works and providing an on-site field laboratory to facilitate a fast turn-around of asbestos air monitoring results to DoE or its agent. The competent person / asbestos assessor (hygienist) will work with the contractor and DoE or its agent and will be responsible for ensuring the asbestos removal contractor achieves a satisfactory level of workmanship, and complies fully with statutory requirements and the requirements of the technical specification.

Commensurate with the above requirements, the specific duties of the supervising occupational hygienist may include:

- Inspection of the integrity of the containment prior to commencement of asbestos removal works
- Inspection of the asbestos removalist's equipment, including Decontamination and negative air units, water filtration systems, vacuum equipment, personal protective equipment (PPE) etc
- Assessment of the asbestos removalist's work methods, use and maintenance of PPE, and Decontamination procedures
- Clearance visual inspection of the work area after the removal of asbestos to ensure the asbestos has been removed to a satisfactory standard
- Asbestos air monitoring in accordance with the SafeWork Australia Membrane Filter Method, during asbestos removal works and as clearance air monitoring after the removal of asbestos, but before dismantling of the containment.

8. Incident response and emergencies

An emergency situation is most likely to entail a scenario where asbestos containing materials (ACMs) / products present on-site have been inadvertently disturbed through actions of DoE Facility staff, pupils, maintenance personnel, contractors, out-of-hours vandalism and criminal entry, visitors, or damage due to severe weather conditions (eg hail damage to external asbestos products), or become exposed in DoE Facility grounds through surface erosion or illegal dumping of waste. Where such events have occurred, the DoE's School Security Unit on 1300 880 021 and DoE Asset Management Unit on 132 779 should be notified immediately.

Emergency Response Procedures shall be initiated and implemented in accordance with the flow chart diagram in Figure 8.1. A range of scenarios and appropriate responses are presented in Section 9 Asbestos Incident Procedures and should be followed when suspected ACMs have been found or when an emergency incident has occurred.

Figure 8.1: Emergency response flow chart



9. Asbestos incident procedures

9.1 Introduction

This asbestos incident procedures section aims to set out the steps to be taken for asbestos management when suspected ACMs have been found in DoE Facility grounds and buildings / facilities. While every effort has been made to include all relevant content, each page is to be used as a guide only, and is to be read in conjunction with the remainder of this AMP and relevant applicable guidance and standards.

A number of scenarios have been included based on real situations and strategies. These scenarios are situations that may potentially arise when suspected ACMs are found (and that have not been previously identified in the on-site hazardous materials register (asbestos). The management procedures described are based on the general management set out in Section 2.

When asbestos has been identified / suspected the on-site hazardous materials (asbestos) register should be immediately updated to include such materials. Where asbestos has been removed or remediated, the on-site hazardous materials (asbestos) register should be updated accordingly.

All DoE asbestos registers and this AMP are available to the community generally via the internet at <u>www.dec.nsw.gov.au/about-</u> <u>us/supplying-to-us/asbestos-register</u>, with the most up-to-date information available internally on the DoE Asset Management System (AMS).

Where asbestos management as set out in this plan requires the labelling of in-situ asbestos that can be safely managed in the DoE Facility or disposal of waste ACMs, please refer to Section 3.6.2 Labelling and Section 7.4, Asbestos Waste Management.

9.1.1 ACM in DoE Facility grounds

Illegal dumping of suspected asbestos waste

Due to the high costs associated with the disposal of asbestos waste, on rare occasions this waste is illegally dumped. Dumped ACM can be mixed with general builders' waste, which may include rubble and spoil. It is not unknown for individuals and companies to dispose of building waste, including asbestos waste, on DoE Facility grounds. This section sets out the procedures to follow in response to a dumping incident.

Single source at surface

When ACM, such as fibrous cement sheeting or other material types, have been found at the surface of DoE Facility grounds over a small area, this is usually due to demolition of a structure containing asbestos such as a building or fence where waste asbestos has been left at the surface or buried instead of being properly disposed of. This section sets out the procedures to follow in response to the finding of such materials.

Extensive surface contamination

ACM, typically as fibrous cement sheeting, has been found over a wide area of DoE Facility grounds. This can be as a result of imported waste materials used for landscaping or from demolition of domestic dwellings previously found on the site, with fibrous cement fragments becoming exposed over time due to surface erosion and soil dynamics, or due to demolition of structures containing ACM (as above). This section describes management of extensive surface contamination.

Fill materials

Fill material has been widely used in DoE Facilities, typically for landscaping / levelling purposes. Fill may also be present in building footprints. Fill generally comprises builders' rubble, typically bricks, although older fill often contains waste fibrous cement materials in addition to other building materials. Fill may also be generated on-site to build up depressions or level grounds. This section describes procedures to follow where fill materials have been found within DoE Facility grounds.

Fill material is not to be imported onto any DoE Facility unless appropriately certified.

In-ground asbestos cement pipes

It is possible that asbestos cement drainage pipes may be present in-situ within the ground at DoE Facilities. While such materials remain buried and in operation, they represent a low risk. Redundant piping may also be present, which represents a low risk if still buried or intact.

9.1.2 Facilities and buildings

Sub-floor of buildings

DoE Facility buildings that have cavities below (typically demountable or older style buildings)

present storage opportunities for waste or spare materials. This can include asbestos building materials, such as Super Six roofing or fibrous cement sheeting. Fibrous cement packing may also be present between piers and the building. Fill materials or demolition waste containing fragments of fibrous cement materials may also be present below demountable buildings and as such require action to remove materials / remediate the area. This section describes management of ACMs that may be found below buildings.

Ceiling or roof space within buildings

DoE Facility buildings that have ceiling or roof space (typically older style buildings) present storage opportunities for waste or spare materials. This can include asbestos building materials, such as Super Six roofing, fibrous cement sheeting or roofing tiles. Fibrous cement packing may also be present between framework and the building. This section describes management of ACMs that may be found within these spaces within buildings.

Appliances and furniture

A number of electrical / heating appliances and furniture have been installed at DoE Facilities that are likely to contain ACMs. These include but are not limited to 'Thermacon' heaters, air-conditioning units and hot metal workbenches. While such appliances and fixtures remain operational in good condition, the risks are controlled; however they should be properly maintained. This section describes day-to-day management of these appliances and fixtures.

Building materials – no damage

Asbestos containing materials are a common building product within structures. Providing that these materials are in a good condition and are not disturbed, they present a negligible risk of exposure and a low health risk. This section describes management of in-situ ACMs that do not require immediate attention.

Building materials – damaged

Damage occurring to ACMs in buildings may cause an increase in the risk of asbestos fibre release. Materials becoming degraded over time may also cause an increase in the risk of asbestos fibre release. Minor surface scratches may not require emergency response actions, rather a repair to the surface coating, although more extensive damage will usually require emergency responses such as restricting access and material removal. This section describes management of in-situ ACMs that may require immediate attention.

Non-friable ACMs to be disturbed by works

There may be occasions where essential maintenance or minor refurbishment work is required where ACMs are present and where work carried out will involve disturbance to these materials. This section describes steps to be taken where work may disturb ACMs or where full removal may be required.

Friable asbestos building materials

A small proportion of facilities may contain friable asbestos insulation materials such as pipe lagging and fire rated spray coatings to metal supports such as roof girders. Friable asbestos typically represents the highest risk to health, although pipe insulation will usually be sealed with a calico type wrap. Where friable asbestos is exposed or loose sprayed, immediate measures are required in order to control the risk. This section describes management of in-situ friable ACMs.

Please note that friable asbestos may only be removed by contractors licensed by WorkCover NSW to remove friable asbestos. Contractors will also be required to apply to WorkCover NSW prior to friable asbestos removal for a work site specific work permit. Please also note that DoE requires that all asbestos works undertaken on DoE Facilities be supervised by an agent of DoE such as DPWS. On some projects on-site supervision and provision of on-site laboratory (asbestos air monitoring services) may be required to be provided by a member of the DoE hygienist panel.

Fire damaged buildings

Where DoE Facility buildings become damaged or destroyed by fire, it is possible that ACMs may also have become damaged. Once ACMs become damaged by fire, there is a significantly elevated potential for fibre release. As such, it is important in all circumstances to restrict access well away from fire damaged buildings in case ACMs are present and have become damaged. This section describes the management of fire damaged buildings with respect to asbestos. Fire damaged asbestos will also likely to be classified as friable, and as such will require removal by a licensed friable asbestos removal contractor.

Air handling units

A small number of DoE Facilities may operate Air handling units containing asbestos cement sheet internal duct lining and/or asbestos millboard within heater banks. Where asbestos cement sheeting is damaged or is likely to become disturbed, units must be sealed off and all ACMs removed. Where asbestos cement sheeting is undamaged, appropriate measures should be undertaken to ensure all surfaces are completely sealed. Where asbestos cement sheet materials are to remain, a risk assessment involving air monitoring must be carried out under full operating conditions to determine whether or not fibres are being released. If asbestos millboard products have been identified or are suspected, these should be removed immediately.

Removal of asbestos from within air handling units will require removal by a Class A licensed friable asbestos removal contractor.

Asbestos containing mastic

Asbestos containing mastic can be found in old style demountables with DPWS Suite 2 aluminium framed windows in the following locations:

- Within the window frame where the glass pane is fixed to the external aluminium frame
- On the window frame where the window is fixed to the demountable steel frame (not consistent)
- On the frame of the plywood and aluminium wall panels where the panel is fixed to the demountable steel frame (not consistent).

It is anticipated that repair works will only be undertaken to the glass pane of the demountable. It is also understood that the asbestos mastic in its current form is enclosed and is deemed to be stable. This section describes management of in-situ asbestos containing mastic.

In addition a Window Asbestos Mastic Procedure has been prepared to provide a procedure for the safe removal of small sections of asbestos putty while repairing a window. Please refer to Appendix H.

Asbestos containing putty

Windows within school buildings may contain asbestos containing putty.

Typically this putty can be identified at the following locations:

- Within the window frame where the glass pane is fixed to the external window frame
- On the window frame where the window is fixed to the building brick or timber work.

It is anticipated that repair works will only be undertaken to the glass pane of the window. This section describes management of in-situ asbestos containing putty.

In addition a Window Asbestos Putty Procedure has been prepared to provide a procedure for the safe removal of small sections of asbestos putty while repairing a window. Please refer to Appendix H.

Accidental disturbance by maintenance / contractor / capital works

Damage occurring to ACMs in buildings may cause an increase in the risk of asbestos fibre release. Minor surface scratches may not require emergency response actions, rather a repair to the surface coating, although more extensive damage will usually require emergency responses such as restricting access and material removal. This section describes management of in-situ ACMs that may require immediate attention.

It is essential that site managers have site asbestos registers checked before undertaking any disturbance within facilities.

In the event that a maintenance contractor were to disturb asbestos after checking the asbestos register and undertaking all necessary precaution, the site manager would be required to:

- Isolate the area
- Not attempt to move / dispose of material
- Immediately advise the Asset Management Unit on 132 779, who will arrange support to the school from the school facilities maintenance contractor or a hygienist from the panel contract.

Accidental disturbance by school based person or GA

Damage occurring to ACMs in buildings may cause an increase in the risk of asbestos fibre release. Minor surface scratches may not require emergency response actions, rather a repair to the surface coating, although more extensive damage will usually require emergency responses such as restricting access and material removal. This section describes management of in-situ ACMs that may require immediate attention.

DoE does not require or support any staff, students or visitors to its sites to undertake any asbestos works. It is essential that site managers have site asbestos registers checked before undertaking any disturbance within facilities. DoE has an existing requirement (Safety Alert No 32) that requires DPWS to deliver or participate in the oversight of any remediation works. It should be noted that DPWS is involved in all DoE capital works, school maintenance works and the panel contract for hygienist services. Site managers are not permitted to undertake asbestos works, including licensed asbestos contractors, without the participation of DPWS.

In the event that a school based person were to disturb asbestos after checking the asbestos register and undertaking all necessary precaution, the site manager would be required to:

- Isolate the area
- Not attempt to move / dispose of material
- Immediately advise the Asset Management Unit on 132 779, who will arrange support to the school from the school facilities maintenance contractor or a hygienist from the panel contract.

9.2 Procedures for ACM in DoE Facility grounds

The following procedures are set out as a guide to follow where suspected ACMs have been found at the surface of DoE Facility grounds.

The following key describes the colour coding of the flow arrows in each procedure:



It should be noted that WorkCover NSW How to Safely Remove Asbestos: Code of Practice states that:

Removal of asbestos from contaminated soil will require a Class A licensed asbestos removalist for any friable asbestos to be removed, and a Class A or a Class B licensed asbestos removalist if more than 10 m² of nonfriable asbestos is to be removed. A person who does not have a licence can remove 10 m² or less of non-friable asbestos as long as the person is trained (Clause 445). Where there is uncertainty as to whether the amount of nonfriable asbestos is more or less than 10 m², a Class A or Class B licensed asbestos removalist should be engaged.

Taking the above into consideration it is a DoE policy to engage a friable licensed asbestos removal contractor (Class A) as best practice for all occurrences of asbestos contaminated soil. The contractor will be engaged from a panel approved by DoE and all engagements will be to WorkCover NSW guidelines and following the advice of a WorkCover NSW licensed asbestos assessor who is also a hygienist engaged from the DoE hygienist panel.

9.2.1 Dumping of suspected asbestos waste

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



9.2.2 Single source ACM at surface

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Suspected single fragment or small number of suspected ACMs observed at a single location.

Example

Fibrous cement sheet debris remaining from builders' waste of recently demolished building / structure.



- **1.** Restrict access to area immediately.
- Do not attempt to dispose of / move material.

Non-asbestos materials

Return area to normal use. No further action required.

- **3.** Contact DoE AMU on 132 779 as soon as practicable and Incident Report and Support Hotline on 1800 811 523.
- **4.** DoE and DPWS will arrange inspections and testing if necessary by consultant from DoE hygienist panel.
- 5. DoE and DPWS to arrange removal of ACMs.

Return area to normal use

Specific maintenance required for the affected area may include additional watering; ensuring that excessive wear / erosion does not occur; and undertaking top-dressing / turfing.

Visual inspections of area to be carried out at three-monthly intervals, after a period of prolonged heavy rain, whenever damage or disturbance to remedial measures has been reported and whenever a suspected asbestos material has been found.

If no suspected asbestos materials are found, continue with normal use. If suspected asbestos materials are found, contact DoE AMU on 132 779 and return to point 1.

9.2.3 Extensive surface contamination

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Numerous fragments of suspected asbestos materials observed over a wide area.

Example

Fibrous cement sheet fragments observed at surface of playing field / school grounds.



- 1. Restrict access to area immediately.
- 2. Do not attempt to dispose of / move material.
- **3.** Contact DoE AMU on 132 779 as soon as practicable and Incident Report and Support Hotline on 1800 811 523.
- **4.** DoE and DPWS will arrange inspections and testing if necessary by consultant from DoE hygienist panel.
- **5.** DoE and DPWS to arrange removal of ACMs / remediation of site.

Non-asbestos materials

Return area to normal use. No further action required.

Return area to normal use

Area to be entered into hazardous materials (asbestos) register.

Visual inspections of area remediated to be carried out at three-monthly intervals, after a period of prolonged heavy rain, whenever damage or disturbance to remedial measures has been reported and whenever a suspected asbestos material has been found.

If no suspected asbestos materials are found, continue with normal use. If suspected asbestos materials are found, contact DoE AMU on 132 779 and return to point 1.

9.2.4 Evidence of suspected ACMs within fill materials

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Fill materials revealed, containing possible ACMs.

Example

Erosion of a school field has revealed evidence of fill materials used for landscaping purposes. Fill typically has been found to consist of building rubble, including fibrous cement sheet materials as well as sand, soil and gravel.



- 1. Restrict access to area immediately.
- Do not attempt to dispose of / move material.
- **3.** Contact DoE AMU on 132 779 as soon as practicable and Incident Report and Support Hotline on 1800 811 523.
- **4.** DoE and DPWS will arrange inspections and testing if necessary by consultant from DoE hygienist panel.
- **5.** DoE and DPWS to arrange removal of ACMs / remediation of site.

Asbestos removed / area remediated

Return area to use. Area to be entered into hazardous materials (asbestos) register.

Visual inspections of area remediated to be carried out at three-monthly intervals, after a period of prolonged heavy rain, whenever damage or disturbance to remedial measures has been reported and whenever a suspected asbestos material has been found.

If no suspected asbestos materials are found, continue with normal use. If suspected asbestos materials are found, contact DoE AMU on 132 779 and return to point 1.

Non-asbestos materials

Return area to normal use.

There remains the possibility that ACMs may be buried further down within the fill. Inspections should be carried out once per year to visually check for further fragments.

If suspected ACMs are found, contact DoE AMU on 132 779 and return to point 1.

Specific maintenance will be related to the extent and nature of the remediation undertaken. Where surface materials have been applied (eg turf, topsoil, mulch) these must be maintained as per the original application.

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9.2.5 In-ground asbestos cement pipes

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Asbestos cement piping is found or suspected to be present within the ground.

Example

Excavation activities have uncovered buried redundant or in-use asbestos cement piping.

Maintenance is carried out on piping that is suspected to contain asbestos.

- **1.** Restrict access to area immediately.
- **2.** Do not attempt to move / work on piping.
- **3.** Contact DoE AMU on 132 779 as soon as practicable and Incident Report and Support Hotline on 1800 811 523.

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 DoE and DPWS will arrange inspections and testing if necessary by consultant from DoE hygienist panel.

Is piping damaged / deteriorated or requires replacing?

Yes →

Piping to be removed

DOE/DPWS is to engage a consultant from the DOE hygienist panel and a licensed asbestos removal contractor to remove all damaged and/or redundant piping. It is DOE policy to engage a friable licensed asbestos removal contractor as best practice for all occurrences of asbestos in soil.

Return area to normal use.



Piping to remain in-situ

- Ensure that all piping is not damaged and no debris is present. Any damaged piping and debris must be removed.
- Piping must be adequately buried and have a surface layer of grass / vegetation or a sealing layer such as concrete, ensuring that the soil does not become eroded and leave any sections of the pipe exposed.
- **3.** Enter pipe into hazardous materials (asbestos) register.
- 4. Return area to normal use.
- Inspect surface level periodically to ensure that damage has not occurred. If damage has occurred, contact DoE AMU on 132 779 for advice and return to point 5.

9.3 Procedures for ACMs in buildings

The following procedures are set out as a guide to follow where suspected ACMs have been found within or around DoE Facility buildings and facilities.

It should be noted that WorkCover NSW define asbestos that has been subjected to hail damage where abrasion has occurred and asbestos that has been demolished without proper removal as friable asbestos. Removal of such materials should be carried out by contractors licensed by WorkCover NSW to remove friable asbestos. Contractors will also be required to apply to WorkCover prior to friable removal for a site specific work permit.



9.3.1 ACMs accessible below buildings

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Suspected ACMs observed below a building / facility.

Example

Maintenance work below a demountable classroom has revealed a stack of stored fibrous cement roofing sheeting. Overland flow channelled below a demountable has eroded the surface and revealed fibrous cement materials at the surface.

Asbestos cement packing is suspected within the demountable piers.



- 1. Restrict access to area immediately.
- 2. Do not attempt to dispose of / move material.
- **3.** Contact DoE AMU on 132 779 as soon as practicable and Incident Report and Support Hotline on 1800 811 523.
- AMU and DPWS will arrange inspections and testing if necessary by consultant from DoE hygienist panel.
- **5.** AMU and DPWS to arrange removal of waste material.



- 1. Restrict access to area immediately.
- 2. Do not attempt to dispose of / move material.
- Contact DoE AMU on 132 779 as soon as practicable and Incident Report and Support Hotline on 1800 811 523.
- **4.** AMU and DPWS will arrange inspections and testing if necessary by consultant from DoE hygienist panel.
- 5. AMU and DPWS to arrange removal of ACMs. Materials not removed to be entered into hazardous materials (asbestos) register.

Non-asbestos materials

Return area to normal use. No further action required.

Return area to use

Visual inspections of area remediated to be carried out at three-monthly intervals, after a period of prolonged heavy rain, whenever damage or disturbance to remedial measures has been reported and whenever a suspected asbestos material has been found.

If no suspected asbestos materials are found, continue with normal use. If suspected asbestos materials are found, contact DoE AMU on 132 779 and return to point 1.

4

9.3.2 ACM accessible within ceiling or roof space of buildings

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

ACMs is found or suspected to be present within ceiling / roof cavities.

Example

Maintenance activities have uncovered old asbestos cement sheets. Dust is found to contain asbestos fibres.

Building rubble, including fibrous cement sheet materials as well as sand, soil and gravel.



- Contact DoE AMU on 132 779 as soon as practicable and Incident Report and Support Hotline on 1800 811 523.
- **3.** AMU and DPWS will arrange inspections and testing if necessary by consultant from DoE hygienist panel.



Area cleared

Return area to normal use.

ACMs to be removed

AMU and DPWS are to engage a consultant from the DoE hygienist panel and a licensed asbestos removal contractor to remove all damaged and/ or redundant ACM. It is DoE's policy to engage a friable licensed asbestos removal contractor as best practice.

Return area to normal use.

9.3.3 Appliances and furniture containing ACM

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Thermacon Heating unit present within school (these units may contain flexible woven asbestos sheeting within the unit). Note: loose insulation materials found near the top of the unit are likely to be non-asbestos.

Hot metal workbench present within school (such benches may have an asbestos cement work surface).

Ovens present within school (on rare occasions, asbestos materials may be within the oven).

Unit damaged / broken

- 1. Restrict access to area as soon as possible.
- 2. Is damage to exterior panels only?

Unit damaged / broken / cannot be repaired

- **1.** Contact DoE AMU on 132 779 as soon as practicable and Incident Report and Support Hotline on 1800 811 523.
- 2. AMU to arrange inspection and removal, appropriate disposal and replacement of unit if found to contain asbestos.

Unit removed

Return area to normal use.

No further action required.



Broken panels

- **1.** Contact GA / AMU to repair / replace panels as soon as possible.
- 2. Can panels be repaired / replaced?

Unit repaired

Return area to normal use. Return unit to operational status.

Ensure that covering panels are maintained.

Enter unit into hazardous materials (asbestos) register.

9.3.4 Non-friable ACM in buildings – no damage

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



9.3.5 Non-friable ACM in buildings – damaged

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Damaged ACMs identified or suspected within a building or facility.

Example

Building inspection has identified a damaged ACMs within a school building.

An incident has resulted in the damage of a known or suspected ACMs.

Asbestos debris found within roof space due to contractors not disposing of waste roof materials.



Minor surface damage

Engage GA or AMU to seal surface scratch with appropriate substance such as paint. Enter material into hazardous materials (asbestos) register.

Return area to normal use and re-inspect to assess condition. Follow procedure 9.3.4.

If structural damage has occurred, start at point 1.

Non-asbestos material

Return area to normal use.

No further action required.

Asbestos removed

Return area to normal use.

Return area to normal use and re-inspect. If condition is found to have deteriorated, contact DoE AMU on 132 779 and return to point 1.

9.3.6 Non-friable ACM to be disturbed by works

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



9.3.7 Asbestos containing sprayed vermiculite ceiling coating

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Work is required that will disturb a vermiculite ceiling coating.

Building inspection has identified impact damage of vermiculite ceiling coating.

Example

No ->

Installation of new equipment requires drilling into a vermiculite ceiling coating.

Check hazardous materials (asbestos) register prior to works being undertaken. Does the work involve disturbing / working on or near an ACM?

WARNING

Vermiculite material is not homogenous. A sample obtained from one location may not be representative of the material as a whole. As such, a sample which returns a result of No Asbestos Detected (NAD), should not be relied upon as being indicative of all vermiculite within a building. For this reason, prior to any works which may disturb vermiculite, additional sampling is required within the area of disturbance as needed by the DoE Hygienist Panel Contractor.

Yes

Contact DoE AMU on 132 779 for advice and Incident Report and Support Hotline on 1800 811 523.

All works to be supervised by DPWS or AMU as directed by DoE. Do not undertake works without supervision, no matter how small the project is.

DoE will instruct on method of work or whether ACMs should be removed prior to work commencing.

Minor surface damage, resulting in debris

- No work to be undertaken until further testing is undertaken by the DoE Hygienist Panel Contractor, who will define the scope of works.
- 2. Do not move or dispose of debris.
- 3. Contacty DoE AMU ion 132 779 and Incident Report and Support Hotline 1800 811 523.
- 4. AMU and DPWS will arrange for hygienst to inspect and identify as asbestos or non-asbestos.
- 5. If non-asbestos, normal cleanup.
- 6. If asbestos, AMU and DPWS to arrange for cleanup, necessary repairs.
- 7. AMU and DPWS to arrange clearances if necessary.

Note: All DoE Asbestos Registers, where Vermiculite testing is NAD, has a precautionary statement. Limited Samples Taken - Vermiculite Ceilings may contain asbestos. Asbestos testing MUST be conducted prior to any disturbance works.

9.3.8 Friable ACM within buildings

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Friable ACMs found within school building.

Example

Maintenance work has encountered friable asbestos insulation to girders in roof.

Damage has occurred to pipes revealing friable asbestos lagging.



- **1.** Immediately restrict access to area.
- 2. Do not attempt to move or dispose of material.
- Contact DoE AMU on 132 779 immediately and Incident Report and Support Hotline 1800 811 523.
- **4.** AMU and DPWS to arrange inspections and testing if necessary by consultant from DoE hygienist panel.
- **5.** AMU and DPWS to arrange appropriate removal or management of ACMs.

Asbestos to be removed

Friable asbestos removed by a WorkCover NSW licensed contractor.

Consultant from DoE hygienist panel clears area to be returned to use.

Asbestos removed and area cleared

Return area to normal use.



Non-asbestos material

Return area to normal use.

Asbestos adequately encapsulated

- Label material as potentially containing asbestos. Enter material into hazardous materials (asbestos) register.
- **2.** Ensure material is not disturbed.
- **3.** Arrange for AMU to re-inspect at least every year to assess condition. If condition found to have deteriorated, follow from point 1.

9.3.9 Fire damaged buildings containing ACM

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Fire has damaged confirmed or suspected ACMs.

Example

Arsonists have set fire to a demountable school building. The building is known to contain asbestos cement eave linings panels.

Fire has gutted part of a school building. The nature of materials present is unknown.



Building released by emergency services

Emergency services response

(fire brigade / police).

- **2.** Do not attempt to access the area under any circumstances.
- Contact DoE AMU on 132 779 immediately if not previously advised and Incident Report and Support Hotline 1800 811 523.
- **4.** AMU and DPWS to arrange inspections and testing as required for hazardous substances by consultant from DoE hygienist panel.

No ACMs found

DPWS to arrange for demolition or repair of building.

ACM found or suspected

- 5. DPWS to arrange for asbestos removal. This may require structural improvements to allow safe access to damaged structures. Air monitoring to be carried out by a consultant from DoE hygienist panel.
- 6. Consultant from DoE panel to provide clearance certificates to DoE upon successful completion of asbestos removal works.
- **7.** DPWS to arrange for demolition or repair of building.

9.3.10 Air handling units containing ACM

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.

Yes



Are asbestos millboard materials present?

Unknown

- Contact DoE AMU on 132 779 immediately and Incident Report and Support Hotline on 1800 811 523.
- AMU and DPWS to arrange inspections and testing if necessary by consultant from DoE hygienist panel.
- **3.** AMU and DPWS to provide appropriate management of ACMs. This may involve removal or leaving materials in-situ with monitoring.



Event

Asbestos cement materials used in air-handling units.

Example

Asbestos cement sheet panels lining internal ducting of air-conditioning system.

Asbestos cement sheet panels lining internal ducting of air-movement system.

Asbestos millboard suspected within heater banks of Air handling system.

1. Do not operate air-handling system.

Millboard products identified

- **2.** Contact DoE AMU on 132 779 immediately.
- **3.** AMU and DPWS to arrange inspections and testing by consultant from DoE hygienist panel. AMU and DPWS to arrange appropriate removal or management of ACMs.

Asbestos to be removed

Friable asbestos removed by licensed contractor.

Consultant from DoE hygienist panel clears area to be returned to use.

Clearance Certificates to be provided to DoE.

Asbestos removed and system cleared

Air handling system may be returned to use.

returned to use.

9.3.11 Asbestos containing chalk boards

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



9.3.12 Asbestos containing mastic

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

The mastic is found within the window frame where the glass pane is fixed to the external aluminium frame, in an old style demountable.

The mastic is found on the window frame or on the frame of the plywood and aluminium wall panels where the panel is fixed to the demountable steel frame (not consistent).



Return area to normal use.

No further action required.

Mastic in good condition

Putty is intact with no visible damage and painted surface (if it exists) in good condition. (ie no peeling or flaking).

Leave and maintain

Enter material into hazardous materials (asbestos) register.

If condition found to have deteriorated, follow procedures as per window asbestos mastic procedure, Appendix H.

If material is likely to be disturbed (eg due to works on glass panes or window frames), re-inspect at least every six months by school. Consider full removal of asbestos material if disturbance may damage surfaces.



9.3.13 Asbestos containing putty

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



9.3.14 Accidental disturbance of ACM by maintenance / contractor / capital works

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

Asbestos or suspected ACMs is damaged by contractor or other non-school based person due to maintenance works or general housekeeping.

Example

Work is undertaken before the register is checked and without sampling, resulting in damage to what is later identified to be asbestos containing vinyl wall lining.

Structural damage

.....>

- **1.** Restrict access to area immediately.
- 2. Do not attempt to move / dispose of material.
- 3. Inform relevant school personnel.
- Contact DoE AMU on 132 779 and Incident Report and Support Hotline on 1800 811 523.
- **5.** AMU and DPWS will arrange inspections and testing if necessary by consultant from DoE hygienist panel.
- **6.** AMU and DPWS to arrange removal or repair as deemed necessary.
- 7. AMU and DPWS to arrange clearances if necessary.

Asbestos repaired

Return area to normal use and re-inspect. If condition is found to have deteriorated, contact DoE AMU on 132 779 and return to point 1.

Non-asbestos material

Return area to normal use / next stage of works.

No further action required.

Asbestos removed

Return area to normal use.
9.3.15 Accidental disturbance of ACM by school based personnel

The processes listed below are a summary of the Emergency response flow chart, Figure 8.1, page 82 that would be applied to this asbestos scenario. Refer to 8.1 for more information.



Event

ACMs or suspected ACMs is disturbed by school based personnel due to maintenance works or general housekeeping.

Example

Work is undertaken around ceiling cavity without prior checking of asbestos register, resulting in disturbance to fibrous cement sheeting.

Structural damage

- **1.** Restrict access to area immediately.
- 2. Do not attempt to paint / move / dispose of material.
- **3.** Contact DoE AMU on 132 779 and Incident Report and Support Hotline on 1800 811 523.
- **4.** AMU and DPWS will arrange inspections and testing if necessary by consultant from DoE hygienist panel.
- **5.** AMU and DPWS to arrange removal or repair as deemed necessary.
- **6.** AMU and DPWS to arrange clearances if necessary.

Asbestos repaired

Return area to normal use and re-inspect. If condition is found to have deteriorated, contact DoE AMU on 132 779 and return to point 1.

Non-asbestos material

Return area to normal use / next stage of works.

No further action required.

Minor surface damage

Engage GA or AMU to seal surface scratch with appropriate substance such as paint. Enter material into hazardous materials (asbestos) register.

Return area to normal use and re-inspect to assess condition. Follow procedure 9.3.4.

If structural damage has occurred, start at point 1.

Asbestos removed

Return area to normal use.

10. Frequently asked questions (FAQs)

(These frequently asked questions and answers have been prepared in terms of queries of the school principals. All scenarios in the questions are purely examples.)

A school's general assistant, while undertaking a small material task, has accidentally disturbed what appears to be fibro. What should be done?

Follow the steps mentioned below:

- Stop working immediately and isolate the immediate area. Check to see if the material is identified in the school's asbestos register.
- Contact the Asset Management Unit (AMU) on 132 779 to seek advice.

For more information, check the DoE's Asset Management Plan Appendix 'F' – Communications Strategy regarding the brochure 'What You Need to Know About Asbestos containing Materials.'

A member of teaching staff requested students to remove loose vinyl tiles in the foyer area of the school as part of an activity. The tiles were subsequently found in the asbestos register to be positive for asbestos. What should be done?

- Stop working immediately and isolate the immediate area.
- Make sure all those involved in the removal of the tiles have undertaken basic personal Decontamination.
- Contact AMU on 132 779 to seek advice.

Along with above steps, check the DoE's Asset Management Plan Appendix 'F' – Communications Strategy regarding the brochure 'What You Need to Know About Asbestos Containing Materials'.

A member of the school staff may have been exposed to asbestos, and has made a complaint about skin and eye irritation. What should be done?

Irritation of eyes and skin is not caused by exposure to asbestos. However, if there is a concern regarding respiratory damage, the teacher should contact their own doctor and the AMU on 132 779. In addition, Work Health and Safety Directorate may be contacted for advice.

How will a school know if buildings contain asbestos?

Please check the asbestos register of the school for identified asbestos containing materials. If a register does not exist, contact the AMU on 132 779 and they will contact a panel contractor to conduct sample tests or asbestos surveys, depending on what's required.

If ever in doubt about whether or not an asset is positive for asbestos, assume asbestos is present and take the necessary precautions by following the steps above and contacting the AMU to seek advice.

Someone has dumped materials that could potentially contain asbestos by the school's footpath. What should be done?

Areas outside school property are a council issue. Contact the local council and inform them of the incident.

Also contact the AMU on 132 779 and inform them of the incident so they can follow up with the council regarding the matter.

For more information, check the DoE's Asset Management Plan Appendix 'F' – Communications Strategy regarding the brochure 'What You Need to Know About Asbestos containing Materials'.

Where can I get a guide to asbestos removal?

Please check the DoE's Asset Management Plan Appendix 'F' – Communications Strategy regarding 'What You Need to Know About Asbestos Containing Materials.' The last section is about where you can get more information.

How does a school find a WorkCover NSW licensed contractor?

Schools do not need to conduct any asbestos works themselves. Consequently, schools do not need to search for any WorkCover NSW licensed contractor themselves.

It is essential that site managers have site asbestos registers checked before undertaking any work that could potentially disturb ACMs within the school's facilities.

In the case of any asbestos related work, the school must contact the AMU on 132 779.

It should be noted that DPWS is involved in all DoE capital works, school maintenance works and the panel contract for hygienist (asbestos assessor) services.

For more information, please read DoE's Asbestos Management Plan.

How can I be sure, as a principal, that the removal of asbestos on a school site has been conducted in a safe manner?

Ensure that the following steps have been taken by a WorkCover NSW licensed contractor while removing fibro sheeting:

- They have received a permit (refer to Appendix A) to commence works from DoE
- They have received a permit from WorkCover NSW relevant to the type of asbestos works to be carried out.

In general, the contractor is to:

- Not use power tools. Asbestos fibres can be released if power tools are used for anything other than the removal of screws.
- Wear an Australian Standards Protection Level 2 (P2) minimum half face disposable mask and disposable coveralls. These are generally available from hardware suppliers. Non-Australian Standards certified masks should not be used where asbestos is present.
- Wet down fibro sheets to reduce dust generation and movement.
- Take the fibro sheets off whole (again, not using power tools as this may create dust).
- Seal fibro sheets in construction grade plastic (this should be 200 microns thick) and dispose of as asbestos waste.

Should the asbestos be in powder form or if it can be crumbled, pulverised or reduced to powder by hand pressure when dry, then an asbestos removal contractor with an AS1 Licence is required for its removal.

Contact the AMU on 132 779 and seek further advice on appropriate removal of asbestos on school sites.

For more information, check the DoE's Asset Management Plan Appendix 'F' – Communications Strategy regarding the brochure 'What You Need to Know About Asbestos Containing Materials'.

As a principal, I have concerns about the neighbours (or a contractor working for them) taking down a shed and demolishing a house and generating dust. Are they doing it safely?

Your neighbour, or their contractor, should be:

- Wearing personal protective equipment (PPE)
- Taking the sheets off whole and not using power tools to minimise dust
- Not working on windy days
- Wetting down the sheets
- Putting them in a plastic lined skip.

If you are worried that they are not doing things safely, contact the AMU on 132 779 immediately.

How do schools know if a neighbour's fibro shed or other building has asbestos in it?

First of all, schools need to identify whether the property is adjoining or not to the school property. If the property is adjoined, then contact the local council and also inform the AMU on 132 779 to seek advice. The AMU will arrange for a sample test by a consultant from the DoE's hygienist panel.

For further information, check the DoE's Asset Management Plan Appendix 'F' – Communications Strategy regarding the brochure 'What You Need to Know About Asbestos Containing Materials'.

Appendix A

Permit to work for works affecting or involving asbestos containing materials

(Section 3.7.3)

To be completed by the Facility Manager.

School principals will require the support of the AMU to complete this documentation for school initiated works.

Part A: Planned work details		
School to complete:		
Work permit number: AMF1	Date of issue	
DoE facility name		
DPWS contact	Phone	
Emergency contact	Phone	
Contractor to complete:		
Permit Issued to	Valid up to	
Contractor's company name		
Address		
Phone	Asbestos license no.	
Location of works		
Duration of works		
Location and description of asbestos containing materials		

Before approval is granted to proceed with work, confirm the following: (school to complete)

1. Has the existing hazardous materials on-site (asbestos) register been examined jointly with the DoE facility manager?	Yes	No
2. Has the area where the intended works are to be performed been examined jointly with the DoE facility manager?	Yes	No
3. Are asbestos containing materials / products present in the work area?	Yes	No
4. Will the works impact on or disturb the asbestos containing materials / products?	Yes	No
5. If YES to question 4 above, are the appropriate asbestos work procedures as outlined in the DoE Facility Asbestos Management Plan documented and understood?	Yes	No
6. Are DoE Facility users at risk of exposure to airborne asbestos?	Yes	No
7. Is it necessary to evacuate DoE Facility staff and students prior to work commencing?	Yes	No
8. Has a copy of the on-site hazardous materials (asbestos) register for the work area concerned been issued to the contractor?	Yes	No
9. Has a copy of a Safe Work Method Statement been supplied and reviewed? (refer to AMU for advice)	Yes	No

Mark as required

Contractor to complete:

WorkCover NSW Asbestos removal Licence required	Yes	No
Health and Safety Plan to meet WorkCover NSW Requirements to be prepared and approved prior to works commencing	Yes	No
Asbestos Supervisor to be present whilst work is being carried out	Yes	No
Personal protection equipment to be worn	Yes	No
No air-conditioning to be running on affected building / floor ('Asbestos No Entry' signs to be placed at each end of affected floor and in the lift lobbies)	Yes	No
No power tools allowed to work on asbestos material without suitable controls		
(Procedures documented in asbestos removal technical specifications / procedures for this work to be adhered to)	Yes	No
Air monitoring required	Yes	No
Clearance visual inspection by independent party required	Yes	No

Comments / Other requirements:

Part B: Acceptance of Work Permit

I/We (The Contractor) have read and understood the requirements of the permit and will undertake work in accordance with the Work Health and Safety Regulation 2011

Contractor's Name	Signature	
DoE Facility Manager Name	Signature	

Part C: Completion of work (If Applicable)

I (The Hygienist (Asbestos Assessor) /Supervisor) have inspected the area where work has been carried out and am satisfied that the works have been carried out in accordance with the work permit and that all asbestos risks are satisfactorily controlled

Hygienists (Asbestos Assessor) and/or Supervisor's Signature

Once signed above no further works can be undertaken on this permit. If work has changed the status of asbestos containing materials, the hazardous materials (asbestos) register must be updated.

Completed permit to be retained by DoE Facility



Identifying asbestos containing materials

Possible situations of asbestos containing materials in DoE facilities



Fibrous cement corrugated roof sheeting panels are very commonly found as roofing on older buildings and occasionally as wall sheeting. Also known as Super Six, these materials typically contain 10-15 per cent asbestos, most commonly chrysotile, although amosite and/or crocidolite have frequently been used. The manufacture of asbestos cement ceased in the late 1980s. A whole of government program removed asbestos cement roofing during the 1980s and early 1990s, however some may remain that was previously unidentified.



Fibrous cement ceiling panels were commonly present in older buildings, as the ceiling between classrooms and the roof space. Usually manufactured in 1-metre wide sheets, with nail or fixing points usually recognisable at 1-metre intervals. Also known as Hardifex, Hardiplank and Villaboard, these materials typically contain 10-15% asbestos, most commonly chrysotile, with amosite and crocidolite occasionally used.



Fibrous cement wall sheeting is occasionally used in older buildings cladding existing walls or used to form partition walls. Usually manufactured in 1-metre wide sheets, with nail or fixing points usually recognisable at 1-metre intervals. Also known as Hardifex, Hardiplank and Villaboard, these materials typically contain 10-15% asbestos, most commonly chrysotile, with amosite and crocidolite occasionally used.



Vinyl floor finishes are very commonly used throughout DoE Facility buildings, usually as small tiles. Sometimes known as Corlon. Generally chrysotile was used as a reinforcing agent between 3-7% for both the vinyl and the reinforced backing of linoleum. Not all vinyl floor tiles contain asbestos and sometimes quantities of asbestos can be too low to detect.







Fibrous cement debris. Imported fill materials used in DoE Facility grounds, such as for landscaping or for gravel tracks, have been found to contain fibrous cement board fragments. Occasionally, previous structures with fibrous cement materials that have existed on DoE Facility grounds may have debris buried in the ground after demolition.



Asbestos information sheets

Common types of asbestos containing materials



Asbestos cement

The most commonly used asbestos material. Common types include corrugated roof sheeting, flat panel sheeting used for walls and ceilings, as well as flue pipes and insulation boards. Flat fibre cement sheeting has been used extensively in eaves lining, ceilings, and internal and external wall linings. These materials typically contain chrysotile asbestos, although amosite and crocidolite may have been used, particularly in older materials. The asbestos fibres are held in a cement bound matrix, and therefore have a low potential to be released unless abraded or damaged.



Resinous asbestos insulation board

Typically, these are found as panels behind and/or in front of electric meters and circuits. Chrysotile is the most common asbestos fibre used in these products. The fibres are held in a bonded matrix, and therefore have a low potential to be released unless the material is abraded or damaged.



Vinyl floor tiles

Vinyl materials often can have very small quantities of asbestos fibre (typically less than 7%), and are usually of the chrysotile type. Asbestos contained in the vinyl body of the tile or sheet is held in a stable matrix. The very low rate of wear does not normally give rise to the fibre release that is to pose a significant health risk. Asbestos may be found in the vinyl body of the tile or sheet, as a fibrous backing under the tile or sheet and/or as a fibrous adhesive used to fix the tile.



Sprayed asbestos insulation

Sometimes referred to as 'limpet'. Sprayed asbestos was applied as a thermal and anti-condensation insulation material on the underside of roofs as well as a fire protection material on steel and concrete reinforced beams and columns, and on the underside of floors. Over-spray of target areas is common. Spray coatings usually contain 55-85% asbestos with one or a combination of chrysotile, amosite and crocidolite. Generally not applied after the 1970s. Sprays have a high potential for fibre release if unsealed.

Common types of asbestos containing materials (continued)



Thermal insulation

Used to insulate pipes, boilers, pressure vessels, calorifiers, etc, and containing between 6 and 85% asbestos content of all types. Often asbestos insulation will be encapsulated with calico and painted, although this type may be easily damaged. Once damage has occurred, the risk of fibre release is high.



Paper / card and textiles

Paper and card products typically contain chrysotile-type asbestos and can be used for electrical / heat insulation of electrical equipment, wiring and plant as well as a lining for other products. These materials, if not encapsulated or bonded, can easily become damaged and release fibres. Asbestos ropes were often used as heat resistant lagging and seals and electrical flash guards in fuses, typically containing chrysotile and/or crocidolite. Cutting of ropes may increase risk of fibre release, along with degradation over time.

Asbestos fibres

Chrysotile: White asbestos fibre. Generally the most commonly used asbestos type. Lowest risk asbestos fibre.

Amosite: Brown asbestos fibre. Frequently used asbestos fibre. Slightly increased health risk than chrysotile.

Crocidolite: Blue asbestos fibre. Not as commonly used. Highest health risks associated with this fibre.

Fibre release

For asbestos containing products to pose a health risk, airborne fibres must be generated either through degradation or high energy mechanical action. The degree of asbestos fibre release, and hence inhalation exposure, is in part dependent upon the matrix material binding the asbestos and its general condition.

Health risks associated with asbestos

The inhalation of airborne asbestos fibres is associated with the development of respiratory diseases. Asbestos related diseases typically do not become apparent until between 20 and 40 years after first exposure.

Asbestosis: Scarring of lung tissue resulting from prolonged inhalation of asbestos fibres. This can result in breathlessness, which may lead to disability and in some cases death.

Lung cancer: Prolonged inhalation of asbestos fibres may increase the risk of developing lung cancer.

Mesothelioma: A cancer of the lining of the chest cavity (pleura) or the lining of the abdominal cavity (peritoneum). Typically only occurs from inhalation of amosite and crocidolite fibres.

Development of asbestos related diseases typically is dependant on a high dose of asbestos inhalation (a function of the extent of fibre and exposure and the period of exposure).





Ground remedial measures and maintenance

DoE facility grounds remedial measures and maintenance techn	iques
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Remedial measure / treatment	Appropriate when:	Maintenance requirements
Grass seeding and/or turfing.	Topsoil has become exposed in an area where asbestos containing materials may be present below clean soil / clean fill. Low traffic areas.	Visual checks to ensure grass cover is adequate at three- monthly intervals. Periodic resting of area may be required.
Topsoil and turfing.	Fill material has become exposed / surface eroded where asbestos containing materials may be present. Low to medium traffic areas.	Visual checks to ensure grass cover is adequate at three-monthly intervals. Periodic resting of area may be required otherwise turf will require re-laying if the surface becomes eroded. Adequate watering during drought periods (this option may not be suitable during periods of extended drought when reservoir levels drop below 40%).
Mulching (may be in conjunction with topsoiling). Locally indigenous plant species can be planted in addition to create a thicker surface layer and to discourage trafficking across the area.	Fill material has become exposed / surface eroded where asbestos containing materials may be present. Low traffic areas.	Visual checks to ensure mulch cover is adequate at three- monthly intervals. Materials should be re-applied if original application becomes displaced or lessens.
Application of geo-fabric and clean fill. Must be used in conjunction with topsoil and turf / seeding or mulching.	Fill materials (containing asbestos) are exposed and high concentrations are expected. Low to medium traffic areas.	As per maintenance requirements for topsoil / turf and mulch. If geo-fabric becomes exposed, clean fill and surface materials must be re- applied. If geo-fabric becomes damaged, consider replacement.
Terracing. Must be used in conjunction with topsoil and turf / seeding or mulching.	Embankments comprising fill materials become eroded, exposing fill and asbestos containing materials.	As per maintenance requirements for topsoil / turf and mulch.
Restricting access using physical barriers, such as fencing, walls, etc. Must be used in conjunction with topsoil and turf / seeding or mulching.	High traffic areas where asbestos containing materials have become exposed (this measure diverts traffic away from the area).	As per maintenance requirements for topsoil / turf and mulch. Ensure that physical barrier integrity is maintained.
Concrete / bitumen encapsulation.	High traffic areas, high risk of exposure to asbestos containing materials in the ground.	Visually inspect periodically to ensure surface is as original application.
Removal of asbestos contaminated fill / soil.	Major works are required in areas that require significant excavations.	N/a – asbestos removed.

Note: Where asbestos remedial measures have been carried out with the exception of removal, excavation works carried out subsequently must be under the authority of a work permit and appropriate PPE and RPE must be worn. Dust suppression must be carried out to avoid potential release of fibres.

Appendix E

Ground remedial measures and maintenance

Safety notices, key points for engaging contractors, local workplace procedure for contractors and demountable checklists

- DN/05/00321 Safety notice no. 10 mandatory survey portable plug-in kilns may contain asbestos
- DN/06/00362 Use of imported fill on school sites
- DN/07/00356 Safety notice no. 17 asbestos survey of Department of Education facilities
- Safety alert no. 32 procedures relating to asbestos during construction work (May 2011)
- DN/12/00505 Safety notice no. 36 sealant containing asbestos in demountable buildings
- DN/13/00168 Safety notice no. 46 use of imported fill containing asbestos, on school sites
- Engaging contractors key points
- Demountable checklists release / transfer and installation

Memorandum to all principals

Safety Notice No 10 – Mandatory Survey: Portable Plug-in Electric Kilns May Contain Asbestos

Reference: DN/05/00321

Date: 9 September 2005

A small portable plug-in electric kiln used in a secondary school industrial arts area has been found to contain fibrous asbestos lagging. Kilns of this type may have application in secondary school industrial arts, creative arts and possibly science areas and may be present in some primary schools.

The Department of Education and Training requires the identification of all portable electric kilns used in schools to determine the range of models and age of this equipment to facilitate any necessary remedial actions.

This issue does not include any of the larger pottery kilns (70, 140 or 280 litre) which are maintained under the School Building Services and Equipment Maintenance Contract.

Principals are required, as a matter of urgency to:

- Identify whether portable plug-in electric kilns are present in the school (sample photographs are attached). Kilns which are obviously not small portable electric kilns should not be reported.
- Advise no later than Thursday 22nd September 2005 the regional WHS Liaison Manager by Fax or email, using the attached form, detailing the type of kilns in the school. A NIL RETURN is required if no portable kiln is present in the school.

As soon as the collated advice is available, additional information will be provided to schools regarding a state wide remediation action.

Should you wish to discuss this matter further please contact your regional WHS Liaison Manager, or Alan Smith, Manager Compliance and Energy, Asset Management on ph: 9561 8956.

Mike Cush General Manager, Asset Management

Portable electric kilns



Photograph 01: Kiln with exposed lagging



Photograph 02: SMF lagged kiln



Photograph 03: Two versions of kiln from same manufacturer

MEMORANDUM TO ALL PRINCIPALS

DN/06/00362

USE OF IMPORTED FILL ON SCHOOL SITES

I am aware of a number of cases where building contractors, neighbouring property owners or members of the school community have approached the school principal to obtain permission to dump excavation soil on a school site. This could be presented to the school as an inexpensive way to enhance school facilities.

Excavated soil being provided to schools in this way could contain fibro fragments or other contaminants. The removal of such materials after distribution across a school site is extremely difficult and can only be achieved at a high cost. Visual inspection is not sufficient to identify all contaminants.

School principals must not permit any individual or organisation to dump fill of any type on a school site. Should there be a need to obtain soil or fill materials, the principal should contact their local Regional Asset Management Unit (AMU) for advice regarding suitable sources of supply and any documentation required. The AMU will document the approved arrangements on the school file. If you are purchasing fill, a reputable supplier will provide certification that the fill is clean on request. Alternatively, a report from a qualified Occupational Hygienist should be obtained prior to acceptance of fill from donors.

Should illegally dumped material be identified on a school site, the principal should immediately restrict access to the dumped waste and must not attempt to remove the material. The principal must contact officers in their Regional AMU which will arrange inspections and any necessary testing in conjunction with the Department of Commerce (Commerce). The AMU and Commerce will then arrange for the safe removal of waste materials out of school hours.

Should you require any further advice regarding this matter please contact Alan Smith, Manager, Compliance & Energy on telephone 02 9561 8956 or John Deeble, Senior Advisor, Asset Services on telephone 02 9561 8084.

Kaing

Beryl Jamieson GENERAL MANAGER, ASSET MANAGEMENT

MEMORANDUM TO PRINCIPALS,

REGIONAL DIRECTORS and

INSTITUTE DIRECTORS

SAFETY NOTICE No.17

DN/07/00356

Asbestos Survey of Department of Education and Training Facilities.

The Department, under State Procurement Contract 0602390, has recently engaged Noel Arnold and Associates to undertake an asbestos survey of schools and TAFE colleges, to commence during Term 4, 2007.

The Department anticipates that surveys will be completed during May 2008 with the asbestos registers provided to schools and colleges during July 2008. The results of this survey will be used to establish an asbestos register for each school and TAFE college.

All schools and colleges can expect to be surveyed unless, they have previously been surveyed with an asbestos register established or all facilities on site have been constructed after 1989.

Principals and College Directors are requested to:

- Respond promptly to enquires from Noel Arnold and Associates when programming the survey of their school/college;
- Facilitate access to sensitive spaces (e.g. student toilet/change facilities) and access to normally locked spaces (e.g. store rooms) to undertake the survey;
- Ensure all school/college staff are aware that contractors from Noel Arnold and Associates are afforded a brief inspection all occupied spaces including those which may be in use for teaching learning purposes; and
- Accommodate variations to the notification periods during the early stages of the survey, i.e. 2 weeks initial notification and 48 hours confirmation will normally apply.

Your support in facilitating this survey is greatly appreciated and feedback to your regional Asset Management Unit, via maintenance review meetings will also be beneficial.

The Department has developed a brochure with information on the contract, the responsibilities of contractors, schools and colleges, and a Site Inspection and Test Report.

The brochure and all other information relating to this contract, is available on the Department's Intranet at: <u>https://detwww.det.nsw.edu.au/assetmanagement/safecomp/asbefibr/</u> The Department will also post future updates on the survey here.

If you have any questions regarding the survey please contact Alan Smith, Manager Compliance and Energy, on telephone number 9561 8956 or fax 9561 8438.

Renformean

Beryl Jamieson General Manager, Asset Management



MEMORANDUM TO:

ASSET MANAGEMENT UNITS REGIONAL DIRECTORS INSTITUTE DIRECTORS SCHOOL EDUCATION DIRECTORS REGIONAL HR MANAGERS REGIONAL ASSET MANAGEMENT UNIT MANAGERS OHS LIAISON MANAGERS PRINCIPALS TAFE COLLEGE AND CAMPUS MANAGERS BER COORDINATORS

SAFETY ALERT No 32

PROCEDURES RELATING TO ASBESTOS DURING CONSTRUCTION WORK

The Department's <u>Asbestos Management Plan</u> sets out the requirements for managing asbestos related issues in construction work.

In accordance with the <u>Asbestos Management Plan</u>, all NSW government schools and TAFE colleges and campuses are required to notify their local Asset Management Unit (AMU) of any works to be carried out on their site. This includes work that may disturb asbestos materials.

In accordance with the Department's procedures set out in the <u>Asbestos</u> <u>Management Plan</u>, it is essential that the appropriate action is taken to check for the presence of asbestos in buildings or grounds before construction work begins on Departmental premises.

There are a range of steps that must take place before construction work commences:

- The contractor is inducted onto the site and given a copy of the school's asbestos register and *Asbestos Management Plan*. With respect to the induction of contractors, there are important processes for safety induction in place. Refer to the site <u>Engaging contractors</u> on the Department's OHS website.
- The contractor understands the procedure in place for reporting unexpected finds of asbestos (refer to Section 5 of the *Asbestos Management Plan*, *Incident Response and Emergencies*)

- The contractor has consulted the asbestos register to determine whether there are any asbestos containing materials in the vicinity of the work
- A permit to work is issued to the contractor and the contractor has the appropriate licences and approvals
- The work area is effectively barricaded and/or isolated
- Ensure appropriate work methods and control measures of any staff member or contractor working on areas of known asbestos contamination, meets all legislative requirements
- Engaging removal contractors when required in response to emergency situations

For further information, please refer to the Asbestos Management Plan.

Asbestos registers have recently been updated to reflect changes that have occurred in recent capital works and any advice regarding the removal and identification of asbestos material that has arisen from maintenance and other activities.

Asset Management Directorate requires that all asbestos related disturbance works involve Public Works to either deliver the works or participate in oversight of any remediation works. This is to ensure all legislative requirements are met and for the necessary documentation to be collected to enable ready update of Asbestos Registers.

The Asset Management website provides further information concerning management of asbestos:

https://detwww.det.nsw.edu.au/assetmanagement/safecomp/asbestosf.htm

Please contact your regional Asset Management Unit on telephone **132 779** if you require support and advice when addressing asbestos issues.

Yours sincerely

Peter Riordan Deputy Director-General Workforce Management and Systems Improvement May 2011

SAFETY NOTICE No.36

DN/12/00150

Sealant containing asbestos in Demountable buildings.

The Department of Education and Communities has confirmed that an asbestos containing mastic like sealant has been used in demountable buildings to weather seal glazing, aluminum window frames and wall panels.

An independent health hygienist has inspected the sealant product and has found it to be nonfriable and assessed the risk associated with this material as low as it would be quite difficult to liberate asbestos due to the sticky nature of the sealant.

Principals are requested to ensure any contractors working on demountable buildings are made aware of this asbestos affectation. This will ensure contractors implement appropriate Workcover approved procedures when works may disturb this product.

The Department is revising all school asbestos registers to include this product as an asbestos affectation, these will be available to Principals via AMS on the Web and the DEC Internet site at:

https://www.det.nsw.edu.au/about-us/supplying-to-us/asbestos-register/

Specific advice regarding the product will the added to the Department's Asbestos Management Plan, which is under review with Workcover pending release for implementation for 2013.

Related information, Safety Notice No. 32, Construction Work and Asbestos, was issued in 2011 and can be found at:

https://detwww.det.nsw.edu.au/adminandmanage/ohands/safety_alert/index.htm

Should you require further advice please contact Alan Smith, Manager Compliance and Environment (Ph: 9561 8956) or Amelia Tsang, Compliance and Safety Officer (Ph: 9561 8969) in Asset Management Directorate.

Peter Johnson **R/Deputy Director-General, Corporate Services** 10 August 2012

SAFETY NOTICE No.46

DN/13/00168

Use of imported fill containing asbestos, on school sites

There have been a number of instances in recent years where building contractors, neighbouring property owners or members of the school community have approached a school principal to obtain permission to dump excavated soil or fill on a school site. This is often presented to the school as an inexpensive way to enhance school facilities.

Excavated soil or fill provided to schools in this way may contain fibro (asbestos) fragments, building rubble (glass or ceramic tiles) or other contaminants. The removal of such soil after distribution across the school site is extremely difficult and can only be achieved at a high cost. Visual inspection is usually not sufficient to identify all contaminants.

Recently there have been a number of instances where a school has accepted contaminated soil/fill. In one recent incident, the inspection and clean-up costs of one truckload of 'donated' fill containing fibro fragments was \$15,000. Had this fill been distributed across a wide area the remediation costs could have been many times greater.

Principals must not permit any individual or organisation to dump soil or fill of any type on a school site. Should there be a need to obtain soil or fill material, the principal should contact their local Asset Management Unit (AMU) on 132 779 for advice on a suitable source of supply and the necessary documentation to ensure that it is clean. The AMU will document this on the school file. If you are purchasing fill, a reputable supplier will provide certification that the fill is clean, on request. This certification must be retained by the school.

If a Principal accepts soil or fill from a donor, the Principal must ensure that a material testing report from a qualified Occupational Hygienist is obtained certifying the soil or fill as clean, prior to the soil or fill being accepted. This certification must be provided to the AMU for attachment to the school file, prior to the soil or fill being placed on the school site.

Should any material be dumped on a school site without the authorisation of the Principal, the Principal must follow the Department's Asbestos Management Plan (Section 6.2.1). This requires Principals to restrict access to the dumped waste immediately and not attempt to remove the material. The incident must be reported to the AMU, after which Public Works will arrange for removal of the material out of school hours.

All future contaminated fill delivered to a school site may be reported to the Environment Protection Authority as an illegal activity under the *Environmental Planning and Assessment Act 1979.* In addition, the school will be required to contribute to clean-up/remediation costs.

Should you wish to discuss this matter further please contact: Paras Doshi, Compliance and Safety Officer on Ph: 9561 8969 or Alan Smith, Manager Environment and Compliance, on Ph: 9561 8956.

Endored Aleran 25/10/13

Anthony Perrrau General Manager, Asset Management Directorate 25 October 2013

Engaging contractors

Under WHS legislation, the obligation to ensure health and safety extends not only to staff and students, but to all workplace visitors, including contractors.

Providing a Work Health and Safety (WHS) induction for all new employees and others undertaking work is a legislative requirement for all departmental workplaces. For detailed information, please check WHS Directorate's Induction link on intranet:

https://education.nsw.gov.au/inside-thedepartment/health-and-safety/training-andinduction

Contractors are often used to carry out maintenance and repair work on Departmental premises. The risk associated with such activities can be high, so particular attention must be paid to health and safety.

To assist Departmental workplace managers, the Department of Public Works and Services (DPWS) addresses WHS requirements in the specifications for all major and minor capital works, as well as maintenance contracts. This includes the:

- Facilities Management Manual
- For Schools:
 - <u>Quick reference guide to school</u> maintenance and cleaning contracts (PDF 422.88 KB)
 - <u>Principals' A-Z guide to school</u> maintenance and cleaning 2011-2016 (PDF 441.34 KB)
 - Participant's guide for school principals: new maintenance and cleaning contracts (PDF 1980.81 KB)

The detailed information on Facilities Management contract is available at:

education.nsw.gov.au/asset-management/ procurements-and-contracts/facilitiesmanagement-contracts/contractorsinformation

Using independent (non-Department of Public Works approved) contractors places the responsibility for overall safety, supervision and ensuring legislative and Departmental requirements are met, on the workplace manager.

Key points for engaging contractors:

Workplace managers should:

- Wherever possible, use government contractors who comply with legislative and Departmental requirements eg maintenance and cleaning contractors.
- Follow Departmental procedures for engaging contractors. See <u>WHS Induction</u>.
- Rigorously check independent contractors to ensure safety obligations are met. Contractors must be suitably licensed and trained to undertake the work required and be able to provide relevant safety and insurance documentation prior to work commencing.
- Ensure that all contractors report to the workplace manager or their delegate on arrival.
- Provide contractors with a site specific induction. Include information on local conditions which may impact on safety, as per the above safety procedures.
- Inform staff, students and visitors of safety procedures while work is in progress.
- Provide opportunities for ongoing consultation and review of safety matters with contractors.
- Monitor contractor performance and raise any safety concerns with the contractor, and where relevant, with the Department of Public Works (DPWS) supervisor.

Further information:

- <u>Asset Management Directorate Asbestos</u>
 <u>Fibro Link on DoE Intranet</u>
- Work Health and Safety Directorate Induction

Reference: Work Health and Safety Directorate & Asset Management Directorate Intranet.

Date: 1st February 2015

DET Demountable release / transfer checklist

If No, no further action is necessary (information is held by DET AMU) Mark any defects on a plan/drawing of the unit and attach to this checklist. Release – Please check each item below and tick box as applicable. Check carried out by: °N Demountable serial number: AMS: Asbestos Present? Yes Current Location: Date:

1. Ceiling Sheet

Element

ė Remediation Guidance 04 Remove sheet, reinstate at installation, refer to Demountable Remove sheet, reinstate on installation, refer to Demountable installation, refer to Demountable installation, refer to Demountable Remove sheet, reinstate at installation, refer to Demountable Stabilise crack and repair on Stabilise crack and repair on repair on installation, refer to Demountable Remediation Stabilise damage panel and Remediation Guidance 01 Remediation Guidance 02 Remediation Guidance 03 No action required No action required No action required Guidance 05 Action Small amounts of wear/ small cracks Large amounts of wear/ sheets, holes, effecting Small cracks (corners) sheets, holes effecting Large cracks & loose Large cracks & loose Good condition Good condition Good condition Small cracks Condition stability stability Wall Sheeting (containing asbestos) (containing asbestos) landing (containing 3. Entry steps and

Installation (if not proceeding to storage on off-site maintenance)

New location: Date:

Check carried out by:

nstallation - Please check each item below and tick box as applicable. Refer to plan/drawing of the unit (see above) attached to this checklist.



installation, refer to Demountable Remediation Guidance 06

sheets, holes, effecting

stability

Large cracks & loose

Remove sheet, reinstate at Remediation Guidance 06

installation, refer to Demountable

Stabilise crack and repair on

No action required

Good condition

Small cracks

(containing asbestos)

4. External eaves

Remediation Guidance 05

large cracks effecting

asbestos)

stability
Appendix F

Communication strategy – brochure 'What you need to know about asbestos containing materials'



WHAT YOU NEED TO KNOW ABOUT ASBESTOS CONTAINING MATERIALS IN NSW GOVERNMENT SCHOOLS

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Introduction

The health, safety and well-being of students and staff is the highest priority of the NSW Department of Education (DoE). This commitment includes ensuring that any asbestos containing materials found in NSW Government schools and other facilities is managed in such a way as to minimise the risk to students, staff, contractors, parents and other visitors to the site.

Asbestos can be found throughout our society. Thousands of Australian businesses, homes and public buildings such as hospitals and schools were built using asbestos containing materials in the roof, floors and walls or have asbestos in insulation and ceilings.

The fact that asbestos fibres can cause asbestos related diseases such as lung cancer and mesothelioma often causes anxiety if people suspect that their home, school or office has asbestos containing materials. However, studies have shown that these products, if in sound condition and left undisturbed, do not pose a significant health risk.

Health problems usually occur when people are unaware of the hazards of working with asbestos containing materials. DoE has therefore implemented processes to ensure that all potential asbestos hazards are appropriately controlled and that asbestos containing materials that have deteriorated and therefore represents a health hazard are immediately removed from NSW Government schools.

This document is designed to help students, staff, parents and the community answer questions and learn the facts about asbestos in NSW Government schools. An awareness and understanding of these issues is essential to ensure that potential asbestos risks are quickly reported and managed, and that students, staff and visitors to the site are protected from possible exposure to asbestos.

Dr Michele Bruniges Director-General of Education

The asbestos issue

What is asbestos and where is it found?

Asbestos is a mineral found in certain types of rock formations. When mined and processed, it takes the form of very small fibres which are usually invisible to the naked eye.



Asbestos became a popular commercial product because it is strong, won't burn, resists corrosion, and insulates well. It was used in around 3,000 products manufactured worldwide, most commonly in the construction, car manufacturing and textile industries.

Between the 1940s until the late 1980s asbestos was widely used in domestic, commercial and government buildings in Australia as 'fibro' wall and ceiling sheeting, 'super six' roofing sheeting, floor and ceiling tiles, as an insulator around pipes or sprayed in buildings, and as a fire retardant. Asbestos is sometimes found in unauthorised material such as fill on school sites.

Bonded (non-friable) and Friable Asbestos

Bonded (non-friable) asbestos containing materials are those where the asbestos fibres are bonded into the matrix eg fibro and which cannot be crushed by hand when dry. Most of the asbestos found in NSW schools, colleges and homes is bonded. Organisations like NSW Health advise that these materials, if left undisturbed and in a reasonable condition, are not a significant health risk.



Friable Asbestos is asbestos fibres or material that contains asbestos and can be pulverized under hand pressure. Friable (loosely bound) asbestos is more hazardous than bonded (non-friable) asbestos, as the fibres can more easily become airborne, presenting a greater risk of them being inhaled. Millboard, pipe and boiler lagging are examples of friable asbestos. Asbestos cement product which has been damaged so that it can be crushed by hand is also considered as friable asbestos.

When is asbestos a problem?

The presence of asbestos containing material at a school does not automatically mean that health is at risk. The potential risk is dependent upon how the asbestos containing material is managed and whether it is bonded (nonfriable) or friable.

Asbestos becomes a health risk when a large amount of asbestos fibres are released into the air and inhaled. Health problems usually occur when people are unaware of the hazards of working with asbestos containing materials. It is therefore important that any work undertaken with materials containing asbestos is done in a manner that ensures minimal release of dust or small particles.

If safety guidelines are followed, asbestos containing materials should not be a problem.

I think I have found some asbestos – what happens next?

If you identify a possible asbestos hazard at your school:

- Do not panic asbestos that is properly managed represents a very low health risk.
 Immediately advise the School Principal; and
- Comply with all asbestos management requirements at the site.

The school principal will:

- See if the material has already been identified in the asbestos register;
- Isolate the immediate area where the material has not previously been identified or where the condition of the material has deteriorated;

- Not attempt to dispose of or remove any material; and
- Contact the DoE Regional Asset Management Unit on 132 779 as soon as possible.

The regional asset management unit will:

- Arrange inspections and testing if necessary;
- Arrange treatment or removal of material if required; and
- Advise when the area can be returned to normal use.

Management of asbestos containing materials

How does DoE manage asbestos containing materials?

DoE ensures that asbestos containing materials are managed in a way that provides the maximum safety to students, staff and visitors to the site. The process followed by DoE includes:

- Making School Principals aware of the requirements for managing asbestos;
- Assessing facilities to ascertain the presence or absence of asbestos;
- Developing and maintaining a register containing the location or suspected location of asbestos at each site;
- Assessing the potential health risks of asbestos containing materials;
- Removing or controlling asbestos containing materials that pose an immediate health risk;
- Ensuring asbestos removalists and maintenance workers are suitably qualified and protected;
- Regularly reviewing and monitoring identified areas to ensure they are in good condition and do not pose an immediate health risk;
- Schools are required to obtain the approval of the Regional Asset Management Unit before undertaking any building work on the site; and

 Within funding constraints, continually working towards asbestos free facilities.

What has DoE done so far?

- DoE has an asbestos management plan which details how it manages asbestos in its facilities and documents the procedures which are followed to minimise the risk of exposure to asbestos of all students, staff and other visitors to the site;
- Visual inspections and testing are undertaken immediately where possible asbestos hazards are identified at a school;
- Inspections of all DoE facilities been completed. A register of areas containing asbestos has been provided to each facility;
- Where there is a risk to health from exposure DoE takes action to encapsulate, enclose or remove the asbestos containing material (see page 7);
- All known hazardous, friable asbestos containing materials have already been removed from schools in previous programs; and
- Schools are provided with advice on how to maintain gardens, grounds and other facilities which have been treated for asbestos containing materials.

What are the methods of controlling asbestos hazards?

DoE has a number of options to control asbestos hazards. It is important to understand that the immediate removal of asbestos containing materials may not be necessary or even the most appropriate action. In some instances the removal process may prove more hazardous than other options as it may increase the risk of fibres being released into the air.

Depending on the particular circumstances and condition of the asbestos containing material DoE will utilise one of the following four options:

Remove

DoE will remove any unstable asbestos containing materials under controlled conditions to ensure the health and safety of all persons at the site.

Leave and monitor

DoE will firstly look to leave and monitor stable asbestos containing materials that are not prone to damage.

Encapsulate or seal

The second option is to encapsulate or seal (ie. paint or coat) stable asbestos containing material that may be prone to damage and therefore need to be protected.

Enclose

DoE may enclose stable asbestos containing material that may be prone to damage but where encapsulating or sealing does not provide sufficient protection or may disturb asbestos fibres.

What are the schools responsibilities?

The main responsibility of the school is to ensure the health and safety of its students, staff and visitors to the site including parents, tradespeople and contractors.

To achieve this, the school principal must:

- Read and comply with all instructions and information provided on asbestos issues
- Provide information to students, staff and parents on the management and control of asbestos in NSW Government schools
- Ensure that contractors appointed by the school to work on or near asbestos containing materials are working in a safe manner (see Page 9)
- Stop any work on or near asbestos containing materials where unsafe practices appear to be happening
- Contact the Regional Asset Management Unit on 132-779 if they have any concerns or require assistance in the management of asbestos, and
- Maintain gardens, grounds and other facilities that have been treated for asbestos or left in-situ in the manner advised by the Asset Management Unit or Contractor.







Staff also have responsibilities including:

- Informing the School Principal if they identify any potential asbestos containing material
- Taking reasonable care to ensure the health and safety of themselves and others under their supervision, and
- Complying with all asbestos management requirements at the site.

How do I know if work on or near asbestos containing materials is being done safely?

Building work done on or near asbestos containing materials will be closely supervised by the Facilities Maintenance Contractor, the Department of Public Works and Services or the Regional Asset Management Unit.

If the work is being undertaken in a safe manner:

- The Contractor will have been inducted onto the site and been given a copy of the Asbestos Register and Asbestos Management Plan
- The Contractor will have consulted the Asbestos Register to determine if there are any asbestos containing materials in the vicinity of the work

- A Permit to Work will have been issued to the Contractor
- The Contractor will have the appropriate licences and approvals (see Page 10)
- The Contractor will have prepared Safe Work method statements
- The work area will be effectively barricaded and / or isolated
- Warning signs will be erected
- Air-conditioning units in adjacent areas will be switched off and vents sealed
- Dust generated from the work will be contained within the immediate area
- Breathing protection devices, disposable coveralls and other necessary personal protective equipment will be worn
- Drop sheets will be used to gather work generated asbestos waste
- Asbestos material which is to be removed will be placed in heavy duty stiff plastic bags, and
- Asbestos disposal bins will be lined with plastic.

What licences and approvals should the contractor completing the works have?

The following environmental approvals and licenses are required for asbestos work and disposal:

- Contractors who remove, repair or disturb areas of 10m² or more of bonded (nonfriable) asbestos must hold a bonded (non-friable) or a friable asbestos licence or a demolition licence issued by WorkCover NSW
- Contractors who remove, repair or disturb friable asbestos material must hold a friable asbestos removal licence issued by WorkCover NSW
- Friable asbestos work must have a permit issued by WorkCover NSW specific for the project undertaken
- WorkCover NSW must be notified at least five days prior to the commencement of work when 10m² or more of bonded (non-friable) asbestos containing materials are removed

- The facility that is to receive asbestos waste material must be licensed by the EPA to receive that material, and
- Contractors must hold insurance appropriate for the asbestos work that is to be carried out.

What do I do if it appears unsafe practices are occurring?

If you see any practices that appear to be unsafe you should advise the School Principal who will contact the Regional Asset Management Unit if required.

The School Principal has the right to stop the work, pending advice from the Asset Management Unit, where they have serious concerns about health and safety.

Work should also be stopped and the Regional Asset Management Unit contacted in all instances where a Contractor finds or suspects the presence of asbestos containing materials when undertaking building or maintenance work at the site.

Where can I get more information?

If you have any further queries you should contact the School Principal. This person will know the most about the asbestos situation at the school and should be able to answer most of your questions relating to the management and control of asbestos at the site. The Principal can seek further advice and support at any time from the Regional Asset Management Unit.

In addition, general information is available on a number of government websites. This information is useful not only for the management of asbestos in schools but also for the many homes and offices which contain asbestos throughout NSW and Australia.

Department of Education Intranet

Asbestos Management Plan

https://education.nsw.gov.au/asset-management/ compliance-and-safety/asbestos-information

Work, Health and Safety (WHS)

https://education.nsw.gov.au/inside-thedepartment/health-and-safety/training-andinduction

Control and Management of Asbestos in the workplace

https://education.nsw.gov.au/inside-thedepartment/health-and-safety/training-andinduction/e-safety-support

Other government websites

NSW Government, Fibro and Asbestos – A Renovator and Homeowner's Guide

www.balranald.nsw.gov.au/wp-content/ uploads/2014/04/asbestos-fibro-renovatorand-homeowners-guide.pdf

NSW Government, Fibro and Asbestos – First Steps Checklist

www.cbcinspections.com.au/Files/ ASBESTOS.pdf

NSW Environment Protection Authority (EPA), Asbestos Waste Monitoring

http://www.epa.nsw.gov.au/wasteregulation/ asbestos-monitor.htm

WorkCover Authority of NSW, Asbestos

www.workcover.nsw.gov.au/ newlegislation2012/health-and-safety-topics/ asbestos/Pages/default.aspx

WorkCover Authority of NSW, Heads of Asbestos Coordination Authorities (HACA)

www.workcover.nsw.gov.au/health-and-safety/ safety-topics-a-z/asbestos/heads-of-asbestoscoordination-authoritis-haca

NSW Health, Asbestos and Health Risks

www.health.nsw.gov.au/environment/ factsheets/Pages/asbestos-and-health-risks.aspx

NSW Health, DIY Safe

www.health.nsw.gov.au/environment/diy/ Pages/default.aspx NSW Health, DIY Safe Dust and Fume Hazard

www.health.nsw.gov.au/environment/diy/ Documents/diysafely.pdf

Department of Health, enHealth Document, Asbestos – A Guide for Householders and the General Public

www.health.gov.au/internet/ publications/publishing.nsf/Content/ CA2578620005D57ACA2579FB0008A15F/ \$File/asbestos-feb13.pdf

Department of Health, enHealth Document, Management of asbestos in the nonoccupational environment

www.health.gov.au/internet/main/publishing. nsf/Content/ohp-enhealth-asbestos-cnt.htm

Asbestos related laws and codes of practice in NSW

Legislation

Work Health and Safety Regulation 2011

www.legislation.nsw.gov.au/maintop/view/ inforce/subordleg+674+2011+cd+0+N

Protection of the Environment Operations (Waste) Regulation 2005

www.legislation.nsw.gov.au/ inforcepdf/2005-497.pdf?id=15937bef-eef8c8ed-d2c1-dd4c148cc79c

WorkCover authority of NSW codes of practice / SafeWork Australia resources

How to Safely Remove Asbestos

www.workcover.nsw.gov.au/__data/assets/ pdf_file/0016/15217/how-to-safely-removeasbestos-code-of-practice-3561.pdf

How to Manage and Control Asbestos in the Workplace

www.workcover.nsw.gov.au/__data/assets/ pdf_file/0015/15216/how-to-manage-controlasbestos-workplace-code-of-practice-3560.pdf

Guide to Working with Asbestos

www.workcover.nsw.gov.au/health-and-safety/ safety-topics-a-z/asbestos/asbestos-training

Heads of Asbestos Coordination Authorities (HACA) – Asbestos Resources

www.workcover.nsw.gov.au/health-and-safety/ safety-topics-a-z/asbestos/heads-of-asbestoscoordination-authorities-haca

Appendix G

DoE hazardous materials (asbestos) register update

- Asbestos register
 - Example flow chart/s for updating register
 - Asbestos register review tool (ARRT) operation manual
- Asbestos register FMweb update procedure

Example flowcharts for updating of register

This section of AMP illustrates the involvement of the hygienist (asbestos assessor) and the updating of the asbestos records in the Asset Management System (AMS).

The following flowchart is provided as an example and explains maintenance of an asbestos register via a panel hygienist and their subsequent use of the Asbestos Register Review Tool (ARRT) prior to a project commencing. It does not aim to show all stakeholders and steps.



Figure G.1: Example flow chart – updating of register by panel contract hygienist

The following flowchart is provided as an example and explains maintenance of an asbestos register via a panel hygienist, their involvement in asbestos management during a project and their subsequent use of the Asbestos Register Review Tool (ARRT). It does not aim to show all stakeholders and steps.



Figure G.2: Example flow chart – updating of register by panel contract hygienist (with project involvement)

Asbestos register – update procedure for FMweb

This section of AMP illustrates the procedure of updating the asbestos records in the FMweb program. The following flowchart explains maintenance of asbestos asset registers in FMweb.

Maintenance of asbestos asset register in FMweb



*DPWS AP – Department of Public Works and Services Authorised Person

Asbestos list screen in FMweb:

- Log in using user name and password in FMweb.
- Click on 'Register' >> 'Asbestos list' from FMweb main menu to go to the asbestos list screen.
- Asbestos asset list screen shows important fields like asbestos asset ID, AMS ID, property name, building, room, element and status details for the selected property and building.
- To get the asbestos asset list, user must select property and building.



• Edit' button on the 'asbestos list' screen open up the 'asbestos details' screen. Users can modify the details of recorded asbestos asset on this page.

Asbestos details screen:

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- Asbestos asset can only be recorded at the element level. Elements drop down list shows all the valid elements for selection.
- 'Location' is a free text box where multiple locations can be entered for a single asbestos asset recorded against element.
- 'Extent' is a free text where users can enter measurements of the assessed asbestos.
- 'Description' is a 500 character long free text where user can enter asbestos description and other details.
- 'Material condition' is a drop down box with the condition options.
- 'Risk status' is drop down box to mark the asbestos condition risk as high, medium or low.
- 'Control priority' is drop down to select priority ranking as high, medium or low.
- 'Status' drop down box allows users to select appropriate status based on the survey result. Contractors should update Asbestos asset status periodically. The status indicator have below 3 options:
 - a. Assumed asbestos
 - b. Tested
 - c. No asbestos detected (NAD)
- 'Comments' is a 500 character free text box where user can enter notes with respect to the periodic assessment of asbestos asset.
- Asbestos details screen is updated to provide an option for contractor to send an approval request to public works authorised person (AP), once inspection is carried out at the site.
- Once contractor tick 'request change certification' checkbox and save the record, auto-email notification will be sent to Public Works AP to inspect and action this item in FMweb.
- New 'authorised person review and approval' panel is added on asbestos details screen in FMweb where PW AP can tick on 'AP approval' check box and add comments in 'notes' text box.

FMweb reports:

• FMweb has reporting facility to generate ad-hoc reports on Asbestos Asset Register maintenance.

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Appendix H

Window asbestos mastic and putty procedure

- Window asbestos mastic procedure
- Window asbestos putty procedure



WINDOW ASBESTOS MASTIC PROCEDURE

NSW GOVERNMENT SCHOOLS DEMOUNTABLE

Revision	Details	Date	Amended by
00	Original	22 August 2012	
A	Amended with comments provided by the Asset Management Directorate	24 October 2012	
В	Insertion of photos to appendix B	17 November 2012	
С	Date amended	22 November 2013	
D	Date amended	15 April 2014	
E	Date amended	3 June 2014	
F	Date amended	1 February 2015	

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Date: See above

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Glossary

Acronym	Definition
А	Amosite Asbestos (brown asbestos)
ACM	Asbestos containing Material
AS 1216	Standards Association of Australia, Classification and Class Labels for Dangerous Goods
AS 1319	Standards Association of Australia, Rules for the Design and Use of Safety Signs for the Occupational Environment
AS 1715	Standards Association of Australia, Selection, Use and Maintenance of Respiratory Protective Devices
AS 1716	Standards Association of Australia, Respiratory Protective Devices
С	Crocidolite Asbestos (blue asbestos)
СН	Chrysotile Asbestos (white asbestos)
Competent person	Contractor that has undertaken asbestos awareness training, has appropriate experience and has been inducted to this WAMP
EPA	Environment Protection Authority
Fibres/mL	Countable Fibre per Millilitre of Air Sampled
L/min	Litres per Minute of Air
Minor Works	Removal of non-friable asbestos putty to an extent of less than <10m2 or approximately 3-4 windows
NAD	No Asbestos Detected
NATA	National Association of Testing Authorities, Australia
NOHSC	National Occupational Health and Safety Commission
PPE	Personal Protective Equipment
RPE	Respiratory Protective Equipment
WAMP	Window Asbestos Mastic Procedure (this document)

1. Introduction

This window asbestos mastic procedure (WAMP) has been developed to assist with the management of asbestos mastic associated with aluminium framed windows installed in some old system demountables located throughout NSW Government Schools.

This WAMP has been developed for the use of Department of Education (DoE), NSW Public Works and school contractors that have been engaged to repair a window following the identification of damage such as a broken window.

Any repairs to windows fitted with asbestos mastic must be undertaken by a competent person; that is, a contractor that has undergone at minimum an asbestos awareness training course, can demonstrate relevant experience and has been inducted into the use of this WAMP.

This WAMP only allows for the competent person to undertake remediation works that do not exceed 10m² of mastic asbestos containing material. In respect of this value of 10m², a comparative linear amount is difficult to determine.

It is considered appropriate that this might not be typically greater than 3-4 windows. Please note that it is not expected that the amount of asbestos containing mastic included within the removal of 3-4 windows is to exceed an amount of 10m², however it is considered that a project of such size requires the involvement and guidance of a contractor working alongside a glazier.

If additional windows need to be repaired/ replaced or if the demountable is to undergo any refurbishment works, works to the windows or other asbestos containing materials must be undertaken by a contractor holding as a minimum a non-friable asbestos removal licence (ASB).

Please refer to Work Health and Safety Act and Regulations 2011 (NSW), WorkCover NSW How to Manage and Control Asbestos in the Workplace Code of Practice 2011, WorkCover NSW How to Safely Remove Asbestos Code of Practice 2011 and the DoE asbestos management plan (AMP), in particular Sections 7 and 9.

1.1 Background

An investigation was undertaken of a typical old style demountable with Public Works Suite 2 aluminium framed windows and asbestos containing mastic was identified in the following locations of the demountable:

- a) Within the window frame where the glass pane is fixed to the external aluminium frame
- b) On the window frame where the window is fixed to the demountable steel frame (not consistent)
- c) On the frame of the plywood and aluminium wall panels where the panel is fixed to the demountable steel frame (not consistent)

As it is anticipated that repair works will only be undertaken to the glass pane of the demountable and as the asbestos mastic in its current form is enclosed and deemed to be stable and safe this WAMP shall only provide a procedure for the safe removal of small sections of asbestos mastic while repairing a window.

2. Window Asbestos Mastic Procedure (WAMP)

2.1 Determination if window is fitted with asbestos mastic



Figure 2.1 Demountable broken window

2.2 Asbestos removal control plan – minor works

The following plan has been developed as a guide to assist with the safe removal of asbestos mastic associated with the aluminium window frames of the old system demountable buildings located at NSW Government Schools.

Each contractor is to assess the works to be done prior to commencement, noting that all asbestos removal works must be undertaken in accordance with the requirements of Work Health and Safety Act and Regulations 2011 (NSW), WorkCover NSW How to Safely Remove Asbestos Code of Practice 2011 and the DoE asbestos management plan (AMP).

Asbestos removal works are only to be undertaken outside of school hours as detailed within the DoE AMP.

All asbestos removal/remediation works must be documented and a certificate of works (see Appendix A) completed and provided to the Asset Management Unit (AMU) representative. The school asbestos register is to be updated with the applicable information.

2.2.1 PPE requirements

All persons engaged in the asbestos removal and window replacement works should wear appropriate PPE including:

- Particulate respirator in accordance with AS 1715 and 1716; as a minimum it is recommended contractors are to be fitted with P2 disposable respirators
- Disposable coveralls that provide particletight protection (Type 5) and limited splashtight protection (Type 6)
- Safe eye protections such as safety glasses, goggles or face shields
- Cut and slip resistant hand protection
- Ankle high, steel capped safety boots, and
- Hard hats.

Please regularly refer to relevant Australian Standard (AS) for further details, and updates.

2.2.2 Site set-up

The work area is to be set up so as not to contaminate areas on either side of the window. Prior to setting up the work area all non-fixed furniture, equipment and miscellaneous goods adjacent to the window should be removed from the area.

200 μ m thick polythene sheeting is to be utilised as drop sheets on either side of the window to collect any debris and to prevent cross-contamination. The drop sheets should extend at least 2 metres from the window.

2.2.3 Removal procedure

The broken glass is to be removed as detailed within the contractor's Safe Work methods statement (SWMS). If mastic is found to be present on the glass pane, the glass is to be placed within 200 µm thick polythene bags and sealed for disposal as asbestos waste. If the glass is found to be free of mastic or if the mastic can be removed cleanly then the glass pane can be disposed of or recycled as normal.

An airless spray should be used to wet the asbestos mastic with a mix of water and wetting agent such as detergent, prior to attempting its removal.

The remaining mastic within the frame is to be scrapped out with the use of hand tools such as scrappers, screw drivers or chisels.

Note: No power tools are to be used during any mastic removal.

Mastic is to be removed as far as reasonably practicable. It is understood that corrugations are present within the aluminium frame which may prevent the removal of all of the mastic. It is expected that residual mastic will remain within the frame; however every effort should be made to remove as much mastic as reasonably practicable prior to the installation of the new window pane. A note to this effect should be placed on the certificate of works detailed within Appendix A.

The frame and tools are to be cleaned with wet rags. If the rags are unable to remove the residual mastic a solvent may be utilised.

The mastic removed along with rags and any debris and dust are to be placed within 200 μ m thick polythene bags for disposal as asbestos waste.

Any debris or dust generated during the removal process must be removed via wet wiping and drop sheets are to be rolled onto themselves and placed within the 200 μ m thick polythene bags for disposal as asbestos waste.

Following the installation of the new glass pane the edges of the window frame are to be sealed with non-asbestos mastic to ensure the remaining asbestos mastic is enclosed and cannot be accessed during normal activity in the area.

At the conclusion of all works the area is to be Decontaminated of all dust and debris with the use of wet wipes to ensure the area is clean and free of dust prior to allowing students and staff to return.

2.2.4 Decontamination

Personal Decontamination must be undertaken each time workers leave the asbestos work area and at the completion of the asbestos removal work. Personal Decontamination should be done within the asbestos work area where recontamination cannot occur. Refer to WorkCover NSW How to Safely Remove Asbestos Code of Practice 2011 and the NSW WHS Regulation 2011 made under NSW WHS Act 2011 for personal Decontamination methods.

For non-friable (bonded) asbestos removal works a dry Decontamination area is to be set up at the entry point of the asbestos work area. This will include a weighed down sheet of 200µm thick polythene sheeting laid on the floor with access to an airless water spray bottle and rags or towels.

When leaving the work area all site personnel must make their way to the nominated dry Decontamination area, spray down their coveralls with water, remove their coveralls inside out and clean their masks and boots using the wet rags. The respirator must remain on during Decontamination and must only be removed on completion of Decontamination.

All equipment that is to leave the work area must also be Decontaminated in the dry Decontamination area with the use of wet rags.

Once the Decontamination process is complete contaminated rags and coveralls must be disposed of in 200µm polythene bags.

2.2.5 Containment, labelling and waste disposal

In accordance with Section 4.8 of WorkCover NSW How to Safely Remove Asbestos Code of Practice 2011, all asbestos containing materials removed or asbestos contaminated material must be either wrapped and sealed within 200 µm thick polythene or placed within 200 µm polythene bag/s that are no longer than 1200 mm and no wider then 900 mm wide. Refer to Section 4.8 for additional guidance.

Bags containing waste are to be sealed with duct tape via the goose neck method and placed and sealed within another 200 μ m polythene bag for transport to an appropriate waste disposal facility licensed to accept asbestos waste.

Polythene sheeting parcels are to be wrapped additionally within 200 µm thick polythene sheeting for transport to an appropriate waste disposal facility licensed to accept asbestos waste.

Prior to leaving site all bags and parcels are to be labelled appropriately and in accordance with Appendix B of WorkCover NSW How to Manage and Control Asbestos in the Workplace Code of Practice 2011 and Section 4.8 of WorkCover NSW How to Safely Remove Asbestos.

As per Section 4.8 of WorkCover NSW How to Safely Remove Asbestos all waste drums or bins should be lined with plastic (minimum 200 μ m thickness), and labels warning of the asbestos waste should be placed on the top and side of each drum or bin with the words, 'Danger: Asbestos Do not break seal' or similar warning.

As per Section 4.8 of WorkCover NSW How to Safely Remove Asbestos, if the volume or size of the asbestos waste cannot be contained within asbestos waste bags, drums or bins, a waste skip, vehicle tray or similar container in good condition should be used. The asbestos should be sealed in double-lined, heavy-duty plastic sheeting or double bagged before it is placed in the skip. However, non-friable asbestos waste may be placed directly into a skip or vehicle tray that has been double-lined with heavy-duty plastic sheeting (200 µm minimum thickness) provided it is kept damp to minimise the generation of airborne asbestos.

As per Section 4.8 of WorkCover NSW How to Safely Remove Asbestos, all asbestos waste must be disposed of as soon as is practicable at a licensed asbestos disposal site. The asbestos waste must be disposed of as soon as reasonably practicable, whether that is at the end of the removal job, when the waste containers are full or at the end of each day if the asbestos waste cannot be secured at the removal site.

Refer to both above mentioned documents for further information.

3. Statement of limitations

3.1 Scope of services

This hazardous materials control plan ('the report') has been prepared in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and Parsons Brinckerhoff (PB) ('scope of services'). In some circumstances the scope of services may have been limited by a range of factors such as time, budget, access and/or site disturbance constraints.

3.2 Reliance on data

In preparing the report, PB has relied upon data, surveys, analyses, designs, plans and other information provided by the Client and other individuals and organisations, most of which are referred to in the report ('the data'). Except as otherwise stated in the report, PB has not verified the accuracy or completeness of the data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report ('conclusions') are based in whole or part on the data, those conclusions are contingent upon the accuracy and completeness of the data. PB will not be liable in relation to incorrect conclusions should any data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to PB.

3.3 Environmental conclusions

In accordance with the scope of services, PB has relied upon the data and has not conducted any environmental field monitoring or testing in the preparation of the report. The conclusions are based upon the data and visual observations and are therefore merely indicative of the environmental condition of the site at the time of preparing the report, including the presence or otherwise of contaminants or emissions.

Within the limitations imposed by the scope of services, the assessment of the site and preparation of this report have been undertaken and performed in a professional manner, in accordance with generally accepted practices and using a degree of skill and care ordinarily exercised by reputable environmental consultants under similar circumstances. No other warranty, expressed or implied, is made.

3.4 Report for benefit of client

The report has been prepared for the benefit of the Client and no other party. PB assumes no responsibility and will not be liable to any other person or organisation for or in relation to any matter dealt with or conclusions expressed in the report, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in the report (including without limitation matters arising from any negligent act or omission of PB or for any loss or damage suffered by any other party in relying upon the matters dealt with or conclusions expressed in the report). Other parties should not rely upon the report or the accuracy or completeness of any conclusions and should make their own enquiries and obtain independent advice in relation to such matters.

3.5 Other limitations

PB will not be liable to update or revise the report to take into account any events, emergent circumstances or facts occurring or becoming apparent after the date of the report.

The scope of services did not include any assessment of the title to nor ownership of the properties, buildings and structures referred to in the report, nor the application or interpretation of laws in the jurisdiction in which those properties, buildings and structures are located.

Appendix A of WAMP

Certificate of works

Certificate of works demountable window repair Works undertaken compliant with window asbestos mastic procedure

Site details:

Schools	
Date	Time
Demountable No.	
Competent person details:	
Company	
Contractor name	
Details of repair/remediation works:	
Location of window [#]	
Pane of glass**	
Details of work	

Conclusion:

Has the asbestos mastic been removed as far as reasonably practicable? (If no make comment below)	Yes	No
Has residual asbestos mastic been sufficiently encapsulated with non-asbestos mastic?	Yes	No
(If no make comment below)		

Sign off:

I of				
confirm that the asbestos mastic has been removed as far as reasonably practicable and the remaining mastic residue has been encapsulated with non-asbestos mastic. The area is now in a safe condition to be				
returned to normal occupation.				
Signature				
Name				
Position				
Company Date				

Reference

Location of window:

In terms of describing the window location the following assumptions are made:

The elevation with the entrance shall be referred to as the 'front.' The elevation with no entrance shall be referred to as the 'back.' Looking at the front, windows shall be numbered 1 onwards from the left. Looking at the back, windows shall be numbered 1 onwards from the right.

Example: The fourth window from the left on the front of the demountable shall be given the identifying number – front-4.

** Pane of glass:

Typically a window has 4 panes. See diagram below:

Fixed pane	Slider
Hopper beneath fixed pane	Hopper beneath slider

Appendix B of WAMP

Photographs



Photograph 01: Old system demountable showing typical wall panels and windows – view from front



Photograph 02: Old system demountable showing typical wall panels and windows – view from rear



Photograph 03: Typical panels removed from demountable –

red arrows show the location of the asbestos containing mastic on the aluminium frame of the panel



Photograph 04: Typical panels showing location of asbestos containing mastic on aluminium frame


Photograph 05: Typical windows – view from inside demountable



Photograph 06: Position where asbestos containing mastic is used to seal the join between the steel frame of the demountable and the aluminium frame

of the windows / panels



Photograph 07: Asbestos containing mastic in the grove of the window where the glass pane is inserted



WINDOW ASBESTOS PUTTY PROCEDURE

NSW GOVERNMENT SCHOOLS BUILDINGS

Revision	Details	Date	Amended by
00	Original	11 December 2012	
01	Date amended	22 November 2013	
02	Date amended	15 April 2014	
03	Date amended	3 June 2014	
04	Date amended	1 February 2015	

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Date: See above

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Appendix A	Certificate of works

Glossary

Acronym	Definition
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ACM	Asbestos containing Material
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AS 1319	Standards Association of Australia, Rules for the Design and Use of Safety Signs for the Occupational Environment
AS 1715	Standards Association of Australia, Selection, Use and Maintenance of Respiratory Protective Devices
AS 1716	Standards Association of Australia, Respiratory Protective Devices
С	Crocidolite Asbestos (blue asbestos)
СН	Chrysotile Asbestos (white asbestos)
Competent person	Contractor that has undertaken asbestos awareness training, has appropriate experience and has been inducted to this WAPP
EPA	Environment Protection Authority
Fibres/mL	Countable Fibre per Millilitre of Air Sampled
L/min	Litres per Minute of Air
Minor Works	Removal of non-friable asbestos putty to an extent of less than <10m2 or approximately 3-4 windows
NAD	No Asbestos Detected
NATA	National Association of Testing Authorities, Australia
NOHSC	National Occupational Health and Safety Commission
PPE	Personal Protective Equipment
RPE	Respiratory Protective Equipment
Trained Personnel	A person from the school, DoE, AMU, Public Works, FM contractor or hygienist; who has gone through an asbestos awareness training session that details the correct method of sampling putty for asbestos content
WAPP	Window Asbestos Putty Procedure (this document)

1. Introduction

This window asbestos putty procedure (WAPP) has been developed to assist with the management of asbestos putty associated with windows installed in NSW Goverment Schools.

This WAPP has been developed for the use of Department of Education (DoE), NSW Public Works and NSW Government school contractors that have been engaged to repair a window following the identification of damage such as a broken window.

Any repairs to windows fitted with asbestos putty must be undertaken by a competent person; that is, a contractor that has undergone at minimum an asbestos awareness training course, can demonstrate relevant experience and has been inducted into the use of this WAPP.

This WAPP only allows for the competent person to undertake remediation works that do not exceed 10m² of putty asbestos containing material. In respect of this value of 10m², a comparative linear amount is difficult to determine.

It is considered appropriate that this might not be typically greater than 3-4 windows. Please note that it is not expected that the amount of asbestos containing putty included within the removal of 3-4 windows is to exceed an amount of 10m², however it considered that a project of such size requires the involvement and guidance of a contractor working alongside a glazier.

If additional windows need to be repaired/ replaced or if the building is to undergo any refurbishment works, works to the windows or other asbestos containing materials must be undertaken by a contractor holding as a minimum a non-friable asbestos removal licence (ASB).

Please refer to Work Health and Safety Act and Regulations 2011 (NSW), WorkCover NSW How to Manage and Control Asbestos in the Workplace Code of Practice 2011, WorkCover NSW How to Safely Remove Asbestos Code of Practice 2011 and the DoE asbestos management plan (AMP), in particular Sections 7 and 9.

1.1 Background

It has been brought to the attention of the DoE that windows within its school buildings may contain asbestos putty. Typically this putty can be identified at the following locations:

- a) Within the window frame where the glass pane is fixed to the external window frame
- b) On the window frame where the window is fixed to the building brick or timber work

As it is anticipated that repair works will only be undertaken to the glass pane of the window and as any other asbestos putty should be enclosed and deemed to be stable and safe this WAPP shall only provide a procedure for the safe removal of small sections of asbestos putty while repairing a window.

2. Window Asbestos Putty Procedure (WAPP)

2.1 Determination if window is fitted with asbestos putty



Figure 2.1 Broken window

2.2 Asbestos removal control plan – minor works

The following plan has been developed as a guide to assist with the safe removal of asbestos putty associated with the window frames of buildings identified as containing asbestos putty windows.

Each contractor is to assess the works to be done prior to commencement, noting that all asbestos removal works must be undertaken in accordance with the requirements of Work Health and Safety Act and Regulations 2011 (NSW), WorkCover NSW How to Safely Remove Asbestos Code of Practice 2011 and the DoE asbestos management plan (AMP).

Asbestos removal works are only to be undertaken outside of school hours as detailed within the DoE AMP.

All asbestos removal/remediation works must be documented and a certificate of works (see Appendix A) completed and provided to the Asset Management Unit (AMU) representative. The school asbestos register is to be updated with the applicable information.

2.2.1 PPE Requirements

All persons engaged in the asbestos removal and window replacement works should wear appropriate PPE including:

- Particulate respirator in accordance with AS 1715 and 1716. As a minimum it is recommended contractors are to be fitted with P2 disposable respirators;
- Disposable coveralls that provide particletight protection (Type 5) and limited splashtight protection (Type 6);
- Safe eye protections such as safety glasses, goggles or face shields;
- Cut and slip resistant hand protection;
- Ankle high, steel capped safety boots; and
- Hard hats.

Please refer to relevant Australian Standard (AS) for further details, and updates.

2.2.2 Site set-up

The work area is to be set up so as not to contaminate areas on either side of the window. Prior to setting up the work area all non-fixed furniture, equipment and miscellaneous goods adjacent to the window should be removed from the area.

200 μ m thick polythene sheeting is to be utilised as drop sheets on either side of the window to collect any debris and to prevent cross-contamination. The drop sheets should extend at least 2 metres from the window.

2.2.3 Removal procedure

The broken glass is to be removed as detailed within the contractor's Safe Work methods statement (SWMS). If putty is found to be present on the glass pane, the glass is to be placed within 200 µm thick polythene bags and sealed for disposal as asbestos waste. If the glass is found to be free of putty or if the putty can be removed cleanly then the glass pane can be disposed of or recycled as normal.

An airless spray should be used to wet the asbestos putty with a mix of water and wetting agent such as detergent, prior to attempting its removal.

The remaining putty within the frame is to be scrapped out with the use of hand tools such as scrappers, screw drivers or chisels.

Note: No power tools are to be used during any Putty removal.

Putty is to be removed as far as reasonably practicable. It is understood that corrugations may be present on the frame which may prevent the removal of all of the putty. It is expected that residual putty will remain within the frame; however every effort should be made to remove as much putty as reasonably practicable prior to the installation of the new window pane. A note to this effect should be placed on the certificate of works detailed within Appendix A.

The frame and tools are to be cleaned with wet rags. If the rags are unable to remove the residual putty a solvent may be utilised.

The putty removed along with rags and any debris and dust are to be placed within 200 μ m thick polythene bags for disposal as asbestos waste.

Any debris or dust generated during the removal process must be removed via wet wiping and drop sheets are to be rolled onto themselves and placed within the 200 μ m thick polythene bags for disposal as asbestos waste.

Following the installation of the new glass pane the edges of the window frame are to be sealed with non-asbestos putty to ensure the remaining asbestos putty is enclosed and cannot be accessed during normal activity in the area.

At the conclusion of all works the area is to be Decontaminated of all dust and debris with the use of wet wipes to ensure the area is clean and free of dust prior to allowing students and staff to return.

2.2.4 Decontamination

Personal Decontamination must be undertaken each time workers leave the asbestos work area and at the completion of the asbestos removal work. Personal Decontamination should be done within the asbestos work area where re-contamination cannot occur.

For non-friable (bonded) asbestos removal works a dry Decontamination area is to be set up at the entry point of the asbestos work area. This will include a weighed down sheet of 200µm thick polythene sheeting laid on the floor with an airless water spray bottle and rags or towels.

When leaving the work area all site personnel must make their way to the nominated dry Decontamination area, spray down their coveralls with water, remove their coveralls inside out and clean their masks and boots using the wet rags. The respirator must remain on during Decontamination and must only be removed on completion of Decontamination.

All equipment that is to leave the work area must also be Decontaminated in the dry Decontamination area with the use of wet rags.

Once the Decontamination process is complete contaminated rags and coveralls must be disposed of in 200 mm polythene bags.

Refer to WorkCover NSW How to Safely Remove Asbestos Code of Practice 2011 and the NSW WHS Regulation 2011 made under NSW WHS Act 2011 for personal Decontamination methods.

2.2.5 Containment, labelling and waste disposal

In accordance with Section 4.8 of WorkCover NSW How to Safely Remove Asbestos Code of Practice 2011, all asbestos containing materials removed or asbestos contaminated material must be either wrapped and sealed within 200 mm thick polythene or placed within 200 mm polythene bag/s that are no longer than 1200 mm and no wider then 900 mm wide. Refer to Section 4.8 for additional guidance.

Bags containing waste are to be sealed with duct tape via the goose neck method and placed and sealed within another 200 mm polythene bag for transport to an appropriate waste disposal facility licensed to accept asbestos waste.

Polythene sheeting parcels are to be wrapped additionally within 200 mm thick polythene sheeting for transport to an appropriate waste disposal facility licensed to accept asbestos waste.

Prior to leaving site all bags and parcels are to be labelled appropriately and in accordance with Appendix B of WorkCover NSW How to Manage and Control Asbestos in the Workplace Code of Practice 2011 and Section 4.8 of WorkCover NSW How to Safely Remove Asbestos.

As per Section 4.8 of WorkCover NSW How to Safely Remove Asbestos all waste drums or bins should be lined with plastic (minimum 200 mm thickness), and labels warning of the asbestos waste should be placed on the top and side of each drum or bin with the words, 'Danger: Asbestos Do not break seal' or similar warning.

As per Section 4.8 of WorkCover NSW How to Safely Remove Asbestos, if the volume or size of the asbestos waste cannot be contained within asbestos waste bags, drums or bins, a waste skip, vehicle tray or similar container in good condition should be used. The asbestos should be sealed in double-lined, heavy-duty plastic sheeting or double bagged before it is placed in the skip. However, non-friable asbestos waste may be placed directly into a skip or vehicle tray that has been double-lined with heavy-duty plastic sheeting (200 mm minimum thicknesses) provided it is kept damp to minimise the generation of airborne asbestos.

As per Section 4.8 of WorkCover NSW How to Safely Remove Asbestos, all asbestos waste must be disposed of as soon as is practicable at a licensed asbestos disposal site. The asbestos waste must be disposed of as soon as reasonably practicable, whether that is at the end of the removal job, when the waste containers are full or at the end of each day if the asbestos waste cannot be secured at the removal site.

Refer to both above mentioned documents for further information.

3. Statement of limitations

3.1 Scope of services

This hazardous materials control plan ('the report') has been prepared in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and Parsons Brinckerhoff (PB) ('scope of services'). In some circumstances the scope of services may have been limited by a range of factors such as time, budget, access and/or site disturbance constraints.

3.2 Reliance on data

In preparing the report, PB has relied upon data, surveys, analyses, designs, plans and other information provided by the Client and other individuals and organisations, most of which are referred to in the report ('the data'). Except as otherwise stated in the report, PB has not verified the accuracy or completeness of the data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report ('conclusions') are based in whole or part on the data, those conclusions are contingent upon the accuracy and completeness of the data. PB will not be liable in relation to incorrect conclusions should any data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to PB.

3.3 Environmental conclusions

In accordance with the scope of services, PB has relied upon the data and has not conducted any environmental field monitoring or testing in the preparation of the report. The conclusions are based upon the data and visual observations and are therefore merely indicative of the environmental condition of the site at the time of preparing the report, including the presence or otherwise of contaminants or emissions.

Within the limitations imposed by the scope of services, the assessment of the site and preparation of this report have been undertaken and performed in a professional manner, in accordance with generally accepted practices and using a degree of skill and care ordinarily exercised by reputable environmental consultants under similar circumstances. No other warranty, expressed or implied, is made.

3.4 Report for benefit of client

The report has been prepared for the benefit of the Client and no other party. PB assumes no responsibility and will not be liable to any other person or organisation for or in relation to any matter dealt with or conclusions expressed in the report, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in the report (including without limitation matters arising from any negligent act or omission of PB or for any loss or damage suffered by any other party in relying upon the matters dealt with or conclusions expressed in the report). Other parties should not rely upon the report or the accuracy or completeness of any conclusions and should make their own enquiries and obtain independent advice in relation to such matters.

3.5 Other limitations

PB will not be liable to update or revise the report to take into account any events, emergent circumstances or facts occurring or becoming apparent after the date of the report.

The scope of services did not include any assessment of the title to nor ownership of the properties, buildings and structures referred to in the report, nor the application or interpretation of laws in the jurisdiction in which those properties, buildings and structures are located.

Appendix A of WAPP

Certificate of works

Certificate of works buildings window repair Works undertaken compliant with window asbestos putty procedure

Site details:

Schools	
Date	Time
Demountable No.	
Competent person details:	
Company	
Contractor name	
Details of repair/remediation works:	
Location of window [#]	
Pane of glass**	

Details of work

Conclusion:

Has the asbestos mastic been removed as far as reasonably practicable? (If no make comment below)	Yes	No
Has residual asbestos mastic been sufficiently encapsulated with non-asbestos mastic?	Yes	No
(If no make comment below)		

Sign off:

L

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confirm that the asbestos mastic has been removed as far as reasonably practicable and the remaining
nastic residue has been encapsulated with non-asbestos mastic. The area is now in a safe condition to be
eturned to normal occupation.

Signature	
Name	
Position	
Company	Date

of



Panel contract brochure



DoE Occupational Hygienist Panel Contract

Briefing information sheet

Advice for school principals and facility managers, regarding responsibilities when using the Occupational Hygienist panel contract. To accompany Memorandum to Principals, Executive Directors and Institute Directors DN/15/00038.

General

- This contract provides Occupational Hygienist Services for the management of its assets to ensure compliance with the relevant legislation, including the NSW Work Health and Safety (WHS) Regulation 2011, particularly as this relates to asbestos as a licenced asbestos assessor.
- The Panel Contractors, providing these services are:
 - Parsons Brinckerhoff Australia Pty Ltd
 - GreencapNAA Pty Ltd (Previously known as Noel Arnolds and Associates)
 - AECOM Australia Pty Ltd
- The contract is for three (2013 2016) years, with a possible one year extension period.
- DoE has mandated the use of this panel contract for asbestos disturbance works such as; all capital works programs (both major and minor works), whether administered centrally via Public Works or DoE or regionally via AMU, school facilities maintenance contract (asbestos issues), programmed inspections to update Asbestos Registers, school funded or administered works and the fibro in-grounds program (both investigations and remediation works).
- All contractors working on asbestos issues in DoE schools are asbestos assessors, licenced with Workcover NSW.
- Panel contractor's services are also to be used for other analytical services such as: Hazardous Materials (HazMat) surveys, Air Quality assessments, lead contamination, water testing, training for asbestos sample taking and other investigations e.g. mobile phone towers.

 When needed, DoE will provide updated information on this contract via the DoE Intranet and this will include a Question/Answer section for issues as they arise, particularly issues identified on the Site Inspection and Test Plan (ITP) Report by schools or contractors:

https://education.nsw.gov.au/asset-management/ compliance-and-safety/asbestos-information

Any questions/issues, Principals have regarding the panel contract should be initially directed to the AMU Project Officer or reported on-line using: **compliance@det.nsw.edu.au**

Panel contractor responsibilities

It is generally the case that Panel Contractors will conform to the following, when there are programmed activities being undertaken on a school site e.g. update of Asbestos Registers.

For Urgent Works, such as critical WHS or Workcover related inspections, notification times may need to be dispensed with.

Notification

- Contractors should only contact schools after initial conformation by DoE is undertaken.
- Contractors will provide advice and inspection results to Asset Management Directorate.
- Contractors are required to notify school principals two weeks prior to any programmed activity, with additional confirmation 48 hours prior to arrival. At the commencement of the programmed activity process schools/colleges may be requested to accept a shorter notification period.
- A record of all notifications must be maintained by contractors.

Site induction briefing

- Contractors are required to participate as required with the normal site briefings provided by the school such as:
 - Site emergency procedures, access to amenities, site specific WHS issues and signing on.

Service/Works process

- Contractors will make contact with the Principal/Director or nominated person prior to commencing works to ensure student sensitive areas (e.g. toilets & change rooms) and locked secure areas can be accessed as needed.
- DoE supports the contractors being given free access to the remainder of sites to facilitate the service/works process. Where schools/colleges have a full time general assistant it would be beneficial if the contractor could be given support to facilitate access.

Sample (Asbestos) Collection

- Contractors may be required to take samples in some buildings. Such sampling (for asbestos) is to be undertaken in the absence of staff and students in the immediate area.
- Sampling (asbestos) is to be undertaken in full compliance with the Safe Work Method Statement agreed with DoE, which is fully in accordance with WorkCover and legislative requirements.

Completion, for programmed works

- The Contractor / DoE Site Inspection and Test (ITP) Report is to be signed off by the Principal/Director/delegate to verify attendance at the site for the times indicated.
- A signed ITP is required for the payment to contractors.

Reporting

 Electronic copies of reports (in DoE AMS file format) will be provided to DoE Asset Management Directorate with payment claims and the reports will be available to schools via "AMS on the web" at a later date.

School responsibilities

For programmed works, especially the update of Asbestos Registers, the following applies:

Prior to use of hygienist services:

- Advise staff the date the hygienist services/works is to be undertaken e.g. updating of Asbestos Registers, and any updated timeline advised by the contractor.
- When the Panel contractor initially contacts the school/ college to schedule any works, a nominated person in addition to the Principal/Director must be specified. When programmed updates of Asbestos Registers is being undertaken, the Panel Contractor will seek advice from the School/College regarding any other facilities on site that may require inspection and activities that may impact on the inspection works e.g. DoE pre-school and defined

events which may be underway during the use of hygienist services (for e.g. HSC, school examinations). It will generally not be practicable to alter programed hygienist services to accommodate local school activities.

 Where possible, negotiate for the General Assistant to be available on the day/s of service to assist regarding site access.

Note: For Urgent Works, such as critical WHS or Workcover related inspections, access will need to be expedited.

During the use of hygienist services, particularly asbestos surveys:

- The contractor is given supervised access to student sensitive spaces (toilets) at a convenient time and any space locked for security purposes.
- Contractors will need to walk freely around the site, making visual inspections of building externals and all habitable internal spaces. It may be necessary for contractors to briefly enter occupied spaces to visually inspect surfaces.
- Some sites will require detailed inspection of buildings or particular spaces which are suspected to contain asbestos containing materials (ACM); such inspections may take some time and require samples to be taken. Other sites and buildings may be surveyed quickly due to buildings being of construction types with little or no ACM or certain buildings constructed after 1988 that are known not to contain ACM.
- The use of hygienist services may also require a photograph of each building inspected, to be taken for administrative purposes. Contractors have been advised that photographs must not include images which permit the identification of students or staff.
- The contractor may need to charge the battery for the survey tablet and have temporary storage of a large ladder and possibly lifting equipment to access high spaces. When there is a specific Work Health and Safety (WHS) requirements, some activities will need to be undertaken in the absence of staff and students or outside of school hours.

Compliance

- All contractors attending Department sites need to check the requirement of child protection check on: www.kidsguardian.nsw.gov.au
- All contractors attending sites must wear photo ID indicating they are employees of a Panel Contractor, and must sign in using the FMC site log book.
- The Department/Public Works will arrange random audits of hygienist services works to ensure compliance with contract requirements.

Specific advice: programmed works – update of Asbestos Registers

- DoE undertook a state-wide survey of schools in 2007/8, which resulted in the creation of an Asbestos Register for all DoE owned facilities; school, TAFE and administrative offices. The Work, Health and Safety (WHS) 2011 Legislation, made additional requirements for Asbestos Registers. DoE is using this panel contract to ensure fully compliance with WHS 2011 legislation.
- Programmed surveys of schools to update Asbestos Registers will focus on schools with large numbers of unresolved asbestos occurrences i.e. assumed asbestos materials, no access spaces, spaces requiring inspection due to building changes, ceiling voids, subfloor areas and vinyl under carpet. This program will supplement asbestos registers being updated as a result of major and minor capital works.
- The use of asbestos containing materials in school building construction ceased prior to 1987, so all facilities constructed prior to 1988 will be surveyed but schools/ colleges wholly constructed after 1988 will only be given a superficial inspection to confirm the construction type/age.
- At the conclusion of the update, the results of materials testing will be incorporated into individual school/college Asbestos Registers. Other site information will also be referenced in the Registers relating to existing grounds occurrences of asbestos (Site Specific Asbestos Management Plan) and known demountable buildings on site.
- All updated registers should be stored with the DoE Asbestos Management Plan (2015). The DoE Asbestos Management Plan (AMP) is available on the DoE Intranet and will be provided for schools in the 2015 school year.
- All school and colleges can access current Asbestos Registers via the DoE Asset Management System (AMS on the Web).

Panel contract inclusion

- Department owned facilities including schools and administration centres on DoE sites will be inspected. This includes Department operated pre-schools, behaviour schools/ out of School Hour care centres located on Department sites and Department owned facilities leased to others.
- Building externals and all habitable internal building spaces and service spaces such as store rooms, plant rooms, electrical rooms/cabinets, under floor areas, ceiling spaces will be inspected.
- It is essential that Asbestos Registers updates are able to resolve all spaces with; assumed asbestos materials, no access spaces, spaces requiring inspection due to building changes, ceiling voids, subfloor areas and vinyl under carpet. Every support should be given to Panel Contractors to resolve these issues.

Panel contract exclusions

 Accommodation leased to DoE will not be surveyed, as an Asbestos Register is required to be maintained by the owner of the building.

Panel contractor details

Parson Brinckerhoff Australia

Level 27, Ernst & Young Centre 680 George Street, GPO Box 5394 Sydney NSW 2001 Australia T +61 2 9272 5100 www.pbworld.com

Contact person: Jason North

T +61 2 9272 5091 M +61 457 520 328 janorth@pb.com.au

GreencapNAA (previously known as Noel Arnold and Assoc.)

Level 2, 11-17 Khartoum Rd North Ryde NSW 2113 Australia T +61 2 9889 1800 F +61 2 9889 1811 www.greencap.com.au

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AECOM Australia

17 Warabrook Boulevard, Warabrook NSW 2304 T +61 2 4911 4900 F +61 2 4911 4825 www.aecom.com

Contact person:

Haley Bates T +61 2 4911 4937 M +61 437 006 269 haley.bates@aecom.com

Any change in the contact details can be found online at: https://education.nsw.gov.au/asset-management/ compliance-and-safety/asbestos-information

Site Inspection and Test Plan (ITP) Report

Contract Requirement

Both the Principal (Principals Delegate or Facility Manager) and Contractors representative are required to initial that each of the following has been completed:

DoE Site (Schools):	Sc	hool code:
Principal/Director name:	Sig	gnature:
Principal/Director delegate (name):	Sig	gnature:
Contractor (business name):		
Contract Surveyor name:	Sig	gnatures:

Principal/Director/ **Contractors initials** A. Briefing nominated person initials A briefing has been provided to the Principal/Director and/or nominated person initial above initial above B. Arrival (First day) Time/s and Date/s of Arrival • 1 1 from School Time (am/pm) Date (dd/mm/yy) initial above initial above C. Departure (Last day) Time/s and Date/s of ÷ 1 1 Departure from School initial above initial above Date (dd/mm/yy) Time (am/pm) **D.** Personnel Names of Panel Contractor and personnel attending the site initial above initial above E. Date of Form completion 1 1 1 Time (am/pm) Date (dd/mm/yy) initial above initial above F. Unresolved issues Note any unresolved issues regarding the inspection are initial above initial above listed to the right

A copy of this schedule should be retained by the school and contractor (original). The contractor is required to affix this schedule to claims for payment.

Contractors must also sign the maintenance contract site log book daily on arrival and departure.

Appendix J

Notes on the asbestos survey 2008 and update of information

How to read asbestos register

- Asbestos register permanent facilities
- Asbestos register demountable facilities
- Asbestos register list of electronic files
- Asbestos register site specific AMP (where applicable)

Asbestos Reç 8165 Bega Hiç	Asbestos Register (Hazardous Materi 8165 Bega High School	tterials and Risk Assessment) for	ssessment) fo	r			NEW	Education
Initial Survey : Noel / T the type of building product identified 3165 Bega High School	Noel / Descriptive information of the building material identified	Unique sample number is derived from the: school number, number, room number and material description	The laboratory am analysis result asbe asbe	An estimated amount of the asbestos material present	The location reference within the area/room the material was identified	Descriptive information of asbestos material state or condition. Refer Section 3.3.2 of AMP		The risk of the asbestos material affecting the occupants of the area/room. Refer Section 3.3. of AMP
Product	Material Description	Sample No	Test Result	Extent	Location Reference	Material Condition	Risk Status	Control Priority
B00A - Multi Pu Evterior	B00A - Multi Purpose Facilities - 1963 - Brick/Block. Evterior	Ţ	the block number and description of the blocks' function, construction date	ption uction		Ē	e priority rating	the priority rating for the need to
Underfloor Voids	No Asbestos Found					ide	control the asbestos material entitied. Refer Section 3.3.4 al Appendix G of AMP	control the asbestos material identified. Refer Section 3.3.4 and Appendix G of AMP
Wall lining	Flat AC Sheeting	8165/B00A/Wall lining/S27	No Asbestos Detected	q				
Ceiling Voids	Non Accessible Area							
Interior								
M0001 - Movement (7.02 m2)	(7.02 m2)							
No Asbestos						/		
M0002 - Control Room (7.64 m2)	om (7.64 m2)				Ceiling Structures/Linings unable to be sampled due to	ings due to		
No Asbestos				E 8	height. due to appearance considered to be Assumed	ance		
M0003 - Performing No Asbectos	M0003 - Performing Ar ts Store (9 92 m2) No Asb arto		×	\langle	Asbestos			
R0001 - Multi-Purpo	R0001 - Multi-Purpose Space (250.83 m2)							
Ceiling Structures/Linings	Flat AC Sheeting	Assumed Asbestos		60m	60m2 West, Lower portion	Good Condition (1)	Low (1)	Low Priority (2-3)
R0002 - Short Falli	80002 - Short Failinment Store (10.59 m2)	Height Restriction						
No Asbestos								
R0003 - Student Cantoon (12.79 mZ) No Asbestos	mtoon (13.79 m2)	Space inspected by Hygienist. No material present that recurite testing i e Building	nist.					
R0004 - Stage (103.19 m2) No Asbestos	.19 m2)	material used would be Bricks, concrete, Timber, Masonites, Plasterboards etc.	es,					
R0006 - Sport Equi	R0006 - Sport Equipment Store (11.59 m2)							
Register Issue Date : Thursday, 26 Mar 2015	ursday, 26 Mar 2015	Ċ	8165 - Bega High School					Page 2 of 44

Annotations – 8165_ASB_260315_Asbestos Register (Page 2 of 44)



Annotation – 8582_ASB_260315_AsbestosRegister (Page 2 of 45)

Appendix K

DoE hazardous materials (asbestos) register

Schools to insert current asbestos registers

- Asbestos register, from AMS on the web
- Site specific AMPs (where applicable) from AMS on the web

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