

Asbestos Management Plan

Section 1 – Purpose and Scope

1.1 Introduction

Southern Cross University is committed to providing a safe and healthy workplace for staff, students and visitors.

To meet its obligations the University must ensure that its employees, contractors and service providers carry out work safely, and in accordance with the relevant Work Health and Safety (WHS) obligations. The objective of an asbestos management plan (AMP) is to set out how asbestos or ACM that is identified at the site will be managed. This AMP includes:

- Current legislative requirements and references to applicable guidelines and Australian standards;
- The duties and responsibilities of the parties involved in the management of the site;
- Site specific recommendations and prioritisation for controlling asbestos related risks.
- Recommendations for safe work practices where asbestos is present

To achieve this, the University and its contractors must ensure that risks from identified hazards are controlled to an acceptable level to avoid injury. This includes:

- a. Completing a Take 5 prior to the commencement of any task;
- b. the design and implementation of safe work procedures and submission of Safe Work Method Statements (SWMS);
- c. undertaking hazard identification and risk, control activities, including the submission of a Risk Assessment (RA);
- d. providing Safety Data Sheets (SDS) as required;
- e. providing appropriate and safe equipment;
- f. provision and use of appropriate Personal Protective Equipment (PPE); and
- g. providing adequate instruction, training and supervision.

1.2 Legislation and Standards

The Legislative requirements, codes of practice and guidelines relating to the management of asbestos include but are not limited to:

- Work Health and Safety Act (2011)
- Work Health and Safety Regulation (2017)
- How to Safely Remove Asbestos Code of Practice (SafeWork NSW 2019)
- How to Manage and Control Asbestos in The Workplace Code of Practice (SafeWork NSW 2019)
- Workplace Exposure Standards for Airborne Contaminants (SafeWork Australia 2019)
- Guidance on the Interpretation of Workplace Exposure Standards for Airborne Contaminants (SafeWork Australia

- AS 4964-2004: Method for the qualitative identification of asbestos in bulk samples
- Guidance note on the membrane filter method for estimating airborne asbestos fibres, 2nd Edition [NOHSC:3003(2005)]

Section 2 - Definitions

Term	Definition
Airborne Asbestos	Any asbestos fibres small enough to be made airborne. For the purposes of monitoring airborne asbestos fibres, only respirable fibres are counted.
Asbestos	The asbestiform varieties of mineral silicates belonging to the serpentine or amphibole groups of rock forming minerals, including actinolite asbestos, grunerite (or amosite) asbestos (brown), anthophyllite asbestos, chrysotile asbestos (white), crocidolite asbestos (blue) and tremolite asbestos or a mixture of any of these.
Asbestos containing material (ACM)	Any material or thing that, as part of its design, contains asbestos.
Asbestos contaminated dust or debris (ACD)	Dust or debris that has settled within a workplace and is, or is assumed to be, contaminated with asbestos.
Asbestos management plan	Set out how asbestos or ACM that is identified in the workplace will be managed, for example what, when and how it is going to be done.
Asbestos-related work	Class A asbestos removal licence or a Class B asbestos removal licence.
Asbestos removalist	A person conducting a business or undertaking who carries out asbestos removal work.
Friable asbestos	Material that is in a powder form or that can be crumbled, pulverised or reduced to a powder by hand pressure when dry, and contains asbestos.
Naturally occurring asbestos (NOA)	The natural geological occurrence of asbestos minerals found in association with geological deposits including rock, sediment or soil.
Non-friable asbestos	Material containing asbestos that is not friable asbestos, including material containing asbestos fibres reinforced with a bonding compound.

Respirable asbestos	Asbestos fibre that is less than 3 microns (m) wide, is more than 5 microns (m) long, has a length to width ratio of more than 3:1.
SCU Responsible Officer	The SCU Responsible Officer is the primary individual responsible for engaging, liaising with and monitoring the contractor on behalf of the University.

Section 3 – Asbestos Management

3.1 Duties, Obligations and Responsibilities

SCU Responsible Officer

The SCU Responsible Officer is the primary individual responsible for engaging, liaising with and monitoring the contractor on behalf of the University. The Contractor must provide the required safety information as part of the procurement process (e.g. tender submission, quotation). This safety information shall be considered when determining the contractor suitability to perform the contracted work and at a minimum, must include:

- a. A thorough understanding of the hazards and risks associated with the scope of works;
- b. Licenses, certificates, registrations and trade qualifications (as applicable to the work);
- c. Current insurance policies for Workers Compensation, Public Liability and Professional Indemnity;
- d. All Workers have the appropriate training with respect to the work;
- e. Safety documentation e.g. Risk Assessments; and
- f. Past performance, safety records and reporting.

When a Contractor has been selected, the SCU Responsible Officer engaging the Contractor must ensure that a contractual agreement and approval is completed as outlined in the <u>Purchasing Procedures</u>. Prior to commencement and for the duration of the works, the SCU Responsible Officer must ensure the following activities are undertaken:

- a. Safety documentation completed, reviewed, and where applicable, approved;
- b. All Workers have completed the relevant inductions and are aware of all work health and safety requirements of the University;
- c. Contractors work safely and complete the work as specified in the contract/work order and safe work method statements;
- d. Implement a process of WHS audits and inspections for Contractors under their remit; and
- e. Keep relevant records and report incidents and hazards.

Workplace Health and Safety Team

The Workplace Health and Safety Team:

- a. Provide advice and support to the SCU Responsible Officer, when required, to determine the health and safety risk controls to be implemented for the contracted work; and
- b. Assist with monitoring Contractor compliance with agreed health and safety risk controls through review of incidents and on-site inspections and audits.

The University's Manager, Workplace Health and Safety is responsible for reviewing the Contractor Safety Procedures in consultation with key stakeholders

3.2 Asbestos Register

The asbestos register is a document that lists all identified (or assumed) asbestos in a workplace. The asbestos register

- 1. Record any asbestos or ACM that has been identified or is likely to be present at the workplace from time to time.

 This would include:
 - The date on which the asbestos or ACM was identified
 - The location, type and condition of the asbestos; or
 - An assessment of risk

The asbestos register for the site should be used in conjunction with this asbestos management plan. The asbestos register for G Block was issued in June 2021:

Report File Name: For Example: N2106015_AsbestosAuditReport_SCU_Lismore_G_Block_V1.0

The asbestos register should be reviewed and if necessary revised by a competent person if:

- 2. The asbestos management plan is reviewed
- 3. Further asbestos or ACM is identified at the workplace
- 4. Asbestos is removed from or disturbed, sealed or enclosed at the workplace

The SCU Responsible Officer must ensure all works are adequately planned and scoped with consideration to all risk factors. During the planning stage the WHS requirements required to commence work are established and communicated through the SCU Contractor Management Framework.

The planning assessment needs to classify the work with consideration to the hazards associated with the work, activities to be conducted, location of the work and complexity of work organisation. At this stage, the SCU Responsible Officer shall identify and confirm the appropriate risk controls for the components of the work that the University has control over for inclusion in the scope / specification.

3.3 Asbestos Management Principles

The significant health risks associated with asbestos include asbestosis, lung cancer, mesothelioma and pleural disease. In general, asbestos health risks arise if airborne asbestos fibres are inhaled. Consequently, the risk assessment of asbestos focuses on the likelihood of asbestos fibres becoming airborne and inhaled by people. Factors that influence the risk assessment include but are not limited to the type and structure of the material, the condition of the material, the location of the material and circumstances that may lead to the material being disturbed.

The decisions, and reasons for the decisions, about the management of asbestos at G Block is based on the risk assessment of asbestos or ACM identified or assumed to be present at the site. The risk assessment for all asbestos or ACM identified or assumed to be present at the site is detailed in the asbestos register.

When setting priorities for managing and implementing controls precedence should be given to those materials with the

highest risk according to the risk assessment. In general controls should be implemented immediately where materials have been given an extreme or high-risk rating whereas medium and low risk materials may have controls implemented over a practical period of time assuming the safety of all people present is maintained at all times.

When choosing the most appropriate control measure, the following hierarchy of controls must be considered:

- 1. Eliminating the risk (for example, removing the asbestos)
- 2. Substituting the risk, isolating the risk or applying engineering controls (for example, enclosing, encapsulation, sealing or using certain tools)
- 3. Using administrative controls (for example, safe work practices)
- 4. Using PPE.

A combination of these controls may be required in order to adequately manage and control asbestos or ACM.

3.4 Prohibited Equipment

- 1. The use of the following equipment is prohibited in relation to asbestos containing materials at the site:
- 2. High-pressure water spray and compressed air must not be used on asbestos or ACM. However, high-pressure water spray can be used for firefighting or fire protection. Power tools, brooms and any other equipment or tool that may release airborne asbestos in the workplace may only be used if it is controlled by it being:
 - a. Enclosed
 - b. Designed to capture or suppress airborne asbestos
 - c. Used in a way that is designed to capture or suppress airborne asbestos safely.
 - d. A combination of the controls mentioned above may be required to ensure that airborne asbestos is not generated.
- 2. Asbestos related work, meaning any work involving the disturbance of asbestos or ACM is prohibited at the site.
- 3. The exception to this is that a trained and competent person may conduct works involving asbestos for the purpose of implementing a control measure or removing asbestos or ACM. As a minimum a Class A or Class B licensed asbestos contractor should be used for such tasks when required.
- 4. The re-use or re-purposing of asbestos containing materials (even if in good condition) is prohibited at site.
- 5. Asbestos waste of any amount, including contaminated materials or PPE, must not be disposed in general waste. The transport and disposal of asbestos and asbestos waste must be done in accordance with jurisdictional legislation.

3.5 Emergency and Unexpected Finds Procedure

In the event that a suspected asbestos containing material is discovered or becomes damaged at the site the following procedure should be applied:

- Stop work and vacate the area where the potential asbestos has been discovered or damaged
- Consult a competent to assess the risk and test the material

- Restrict access to the area and install barricades and signage
- If required implement controls to make safe before re-occupying the area
- Report the incident to Southern Cross University Lismore Property Services

Section 4 – Asbestos Removal Procedures

General requirements for conducting asbestos removal work are as follows:

- 1. Asbestos should be removed in accordance with the WHS Regulation 2017 and How to Safely Remove Asbestos Code of Practice (SafeWork NSW 2019)
- 2. The planning, removal methodology, control measures, monitoring requirements and clearance procedures for the removal of asbestos must be determined in consultation with an occupational hygienist and documented in the Asbestos Removal Control Plan prior to commencing removal.
- 3. An asbestos removal control plan should include as a minimum:
 - a. The method proposed to be used to remove the asbestos;
 - b. The approximate quantity and kind of asbestos to be removed;
 - c. The equipment proposed to be used to remove the asbestos, including any personal protective equipment;
 - d. Details of the proposed air monitoring and clearance procedures
 - e. Transportation and waste disposal requirements
- 4. The person(s) removing asbestos must be a holder of an A class asbestos removal license for friable asbestos and a B class asbestos removal license for non-friable asbestos.
- 5. The person conducting air monitoring and clearance for asbestos removal must be a Licensed Asbestos Assessor (LAA) for friable asbestos or suitably qualified for non-friable asbestos.
 - 2. SafeWork NSW must be notified at least 5 days prior to any licensed asbestos removal

4.1 Recommended Safe Working Practices

SAFE WORK PRACTICE 1 - DRILLING OF ACM

The drilling of asbestos cement sheeting can release asbestos fibres into the atmosphere, so precautions must be taken to protect the drill operator and other persons from exposure to these fibres. A hand drill is preferred to a battery-powered drill, because the quantity of fibres is drastically reduced if a hand drill is used.

Equipment that may be required prior to starting work (in addition to what is needed for the task)

- A non-powered hand drill or a low-speed battery-powered drill or drilling equipment. Battery-powered drills should be fitted with a local exhaust ventilation (LEV) dust control hood wherever possible. If an LEV dust control hood cannot be attached and other dust control methods such as pastes and gels are unsuitable then shadow vacuuming techniques should be used
- Disposable cleaning rags
- A bucket of water, or more as appropriate, and/or a misting spray bottle
- Duct tape
- Sealant
- Spare PPE
- A thickened substance such as wallpaper paste, shaving cream or hair gel
- 200 µm plastic sheeting
- A suitable asbestos waste container (e.g. 200 μm plastic bags or a drum, bin or skip lined with 200 μm plastic sheeting)
- Warning signs and/or barrier tape
- An asbestos vacuum cleaner
- A sturdy paper, foam or thin metal cup, or similar (for work on overhead surfaces only).

SAFE WORK PRACTICE 1 - DRILLING OF ACM

PPE

 Protective clothing and RPE (see AS1715, AS 1716). It is likely that a class P1 or P2 half face respirator will be adequate for this task, provided the recommended safe work procedure is followed.

Preparing the asbestos work area

- If the work is to be carried out at a height, appropriate precautions must be taken to prevent falls.
- Ensure appropriately marked asbestos waste disposal bags are available. •
- Carry out the work with as few people present as possible.
- Segregate the asbestos work area to ensure unauthorised personnel are restricted from entry (e.g. close door and/or use warning signs and/or barrier tape at all entry points). The distance for segregation should be determined by a risk assessment.
- If drilling a roof from outside, segregate the area below.
- If access is available to the rear of the asbestos cement, segregate this area as well as above.
- If possible, use plastic sheeting, secured with duct tape, to cover any surface within the asbestos work area that could become contaminated.
- Ensure there is adequate lighting.
- Avoid working in windy environments where asbestos fibres can be redistributed.
- If using a bucket of water, do not resoak used rags in the bucket, as this will contaminate the water. Instead, either fold the rag so a clean surface is exposed or use another rag.

Drilling vertical surfaces

- Tape both the point to be drilled and the exit point, if accessible, with a strong adhesive tape such as duct tape to prevent the edges crumbling.
- Cover the drill entry and exit points (if accessible) on the asbestos with a generous amount of thickened substance. Drill through the paste.
- Use damp rags to clean off the paste and debris from the wall and drill bit.
- Dispose of the rags as asbestos waste as they will contain asbestos dust and fibres.
- Seal the cut edges with sealant.
- If a cable is to be passed through, insert a sleeve to protect the inner edge of the hole.

Drilling overhead horizontal • Mark the point to be drilled.

SAFE WORK PRACTICE 1 - DRILLING OF ACM

surfaces

- Drill a hole through the bottom of the cup.
- Fill or line the inside of the cup with shaving cream, gel or a similar thickened substance.
- Put the drill bit through the hole in the cup so that the cup encloses the drill bit,
 and make sure the drill bit extends beyond the lip of the cup.
- Align the drill bit with the marked point.
- Ensure the cup is firmly held against the surface to be drilled.
- Drill through the surface.
- Remove the drill bit from the cup, ensuring that the cup remains firmly against the surface.
- Remove the cup from the surface.
- Use damp rags to clean off the paste and debris from the drill bit.
- Dispose of the rags as asbestos waste, as they will contain asbestos dust and fibres.
- Seal the cut edges with sealant.
- If a cable is to be passed through, insert a sleeve to protect the inner edge of the hole.

Decontaminating the asbestos work area and equipment

- Use damp rags to clean the equipment.
- Carefully roll or fold any plastic sheeting used to cover any surface within the asbestos work area, so as not to spill any dust or debris that has been collected.
- If necessary, use damp rags and/or an asbestos vacuum cleaner to clean any remaining visibly contaminated sections of the asbestos work area.
- Place debris, used rags, plastic sheeting and other waste in the asbestos waste bags/container.
- Wet wipe the external surfaces of the asbestos waste bags/container to remove any adhering dust before they are removed from the asbestos work area.

Personal decontamination should be carried out in a designated area

- If disposable coveralls are worn, clean the coveralls while still wearing RPE using a HEPA vacuum, damp rag or fine-water spray. RPE can be cleaned with a wet rag or cloth.
- While still wearing RPE, remove coveralls, turning them inside-out to entrap any remaining contamination and then place them into a labelled asbestos waste bag.
- Remove RPE. If non-disposable, inspect it to ensure it is free from

SAFE WORK PRACTICE 1 – DRILLING OF ACM

	 contamination, clean it with a wet rag and store in a clean container. If disposable, cleaning is not required but RPE should be placed in a labelled asbestos waste bag or waste container. Refer to the Code of Practice: How to Safely Remove Asbestos for more information.
Clearance procedure	 Visually inspect the asbestos work area to make sure it has been properly cleaned. Clearance air monitoring is not normally required for this task. Dispose of all waste as asbestos waste. Refer to the Code of Practice: How to Safely Remove Asbestos for more information.

SAFE WORK PRACTICE 2 – SEALING, PAINTING, COATING AND CLEANING OF ASBESTOS CEMENT PRODUCTS

These tasks should only be carried out on asbestos that is in good condition. For this reason, the ACM should be thoroughly inspected before starting the work. There is a risk to health if the surface of asbestos cement sheeting is disturbed (e.g. from hail storms and cyclones) or if it has deteriorated as a result of aggressive environmental factors such as pollution. If it is so weathered that its surface is cracked or broken, the asbestos cement matrix may be eroded, increasing the likelihood that asbestos fibres will be released. If treatment is considered essential, a method that does not disturb the matrix should be used. Under no circumstances should asbestos cement products be water blasted or dry sanded in preparation for painting, coating or sealing.

Equipment that may be	Disposable cleaning rags	
required prior to starting	A bucket of water, or more as appropriate, and/or a misting spray bottle	
work (in addition to what	Sealant	
is needed for the task)	Spare PPE	
	A suitable asbestos waste container	
	Warning signs and/or barrier tape.	
PPE	Protective clothing and RPE (see AS1715, AS 1716). It is likely that a class P1 or	
P2 half face respirator will be adequate for this task, provided the reco		
	safe work procedure is followed. Where paint is to be	
	applied, appropriate respiratory protection to control the paint	

SAFE WORK PRACTICE 2 – SEALING, PAINTING, COATING AND CLEANING OF ASBESTOS CEMENT PRODUCTS

vapours/mist must also be considered.

Preparing the asbestos work area

- If work is being carried out at heights, precautions must be taken to prevent falls.
- Before starting, assess the asbestos cement for damage.
- Ensure appropriately marked asbestos waste disposal bags are available.
- Carry out the work with as few people present as possible.
- Segregate the asbestos work area to ensure unauthorised personnel are restricted from entry (e.g. close door and/or use warning signs and/or barrier tape at all entry points). The distance for segregation should be determined by a risk assessment.
- If working at a height, segregate the area below.
- If possible, use plastic sheeting secured with duct tape to cover any floor surface within the asbestos work area which could become contaminated. This will help to contain any runoff from wet sanding methods.
- Ensure there is adequate lighting.
- If using a bucket of water, do not resoak used rags in the bucket, as this will
 contaminate the water. Instead, either fold the rag so a clean surface is exposed
 or use another rag.
- Never use high-pressure water cleaning methods.
- Never prepare surfaces using dry sanding methods. Where sanding is required, you should consider removing the asbestos and replacing it with a non-asbestos product.
- Wet sanding methods may be used to prepare the asbestos, provided precautions are taken to ensure all the runoff is captured and filtered, where possible.
- Wipe dusty surfaces with a damp cloth.
- Never prepare surfaces using dry sanding methods. Where sanding is required, you should consider removing the asbestos and replacing it with a non-asbestos product.
- Wet sanding methods may be used to prepare the asbestos, provided precautions are taken to ensure all the runoff is captured and filtered, where possible.
- Wipe dusty surfaces with a damp cloth.

SAFE WORK PRACTICE 2 – SEALING, PAINTING, COATING AND CLEANING OF ASBESTOS CEMENT PRODUCTS

Painting and sealing

- When using a spray brush, never use a high-pressure spray to apply the paint.
- When using a roller, use it lightly to avoid abrasion or other damage.

Decontaminating the asbestos work area and equipment

- Use damp rags to clean the equipment.
- If required, use damp rags and/or an asbestos vacuum cleaner to clean the asbestos work area.
- Place debris, used rags, plastic sheeting and other waste in the asbestos waste bags/container.
- Wet wipe the external surfaces of the asbestos waste bags/container to remove any adhering dust before they are removed from the asbestos work area.

Personal decontamination should be carried out in a designated area

- If disposable coveralls are worn, clean the coveralls while still wearing RPE using a HEPA vacuum, damp rag or fine-water spray. RPE can be cleaned with a wet rag or cloth.
- While still wearing RPE, remove coveralls, turning them inside-out to entrap any remaining contamination and then place them into a labelled asbestos waste bag.
- Remove RPE. If non-disposable, inspect it to ensure it is free from
 contamination, clean it with a wet rag and store in a clean container. If
 disposable, cleaning is not required but RPE should be placed in a labelled
 asbestos waste bag or waste container.
- Refer to the Code of Practice: *How to Safely Remove Asbestos* for more information.

Clearance procedure

- Visually inspect the asbestos work area to make sure it has been properly cleaned.
- Clearance air monitoring is not normally required for this task.
- Dispose of all waste as asbestos waste.
- Refer to the Code of Practice: *How to Safely Remove Asbestos* for more information.

Section 7 – Incident Management

The University's <u>WHS Risk Management Procedures</u> details the procedures for reporting incidents and hazards via the online management system <u>RiskWare</u>.

7.1 Notifiable Incidents

Any notifiable incident (fatality, serious injury/illness and dangerous incident – potentially resulting in injury, or a pollution incident with potential to materially harm the environment) is to be reported immediately:

- 1) To the Emergency Services on 000 and then to SCU Security on 73333 for incident response and first aid.
- 2) To the University's Director, Property Services and Manager, Workplace Health and Safety.

Where a notifiable incident has occurred on site, the Contractor must take measures to ensure, so far as is reasonably practicable, that the site where the incident occurred is not disturbed until an inspector arrives at the site or any earlier time that an inspector directs. This does not apply where interference is necessary to aid or revive any person involved in an accident or to prevent further injury to persons or property.

Definitions of a notifiable incident can be found at <u>NSW Safe Work 'Notifiable Incidents'</u> & <u>QLD WorkSafe 'Confirm if</u> an incident is notifiable'.

7.2 Non-Compliance

If a Contractor is found in breach of their contract or any WHS requirements, all work with regard to that activity will be suspended. The Contractor will be alerted to the matter in writing by the University. Work will not recommence until the University is satisfied that adequate controls are in place to avoid risk of injury or further breaches. Inadequate WHS performance, including one-off instances or continuous breaches, can lead to the termination of a contract and failure of being awarded further contract work. Breaches are to be reported to the Manager, Workplace Health and Safety.

Examples of WHS breaches may include non-compliance with legislation, SCU WHS requirements or not observing controls as stipulated in a safety document.

Section 8 – Incident Management

The SCU Responsible Officer will at the completion of the works;

- a. Conduct an inspection of the area where the work was carried out to confirm it has been left free of hazards. If there are geographical restrictions, this inspection may be performed by an appropriate SCU delegate;
- b. Provide information to the Manager, Work Health and Safety if required for updating relevant WHS risk registers etc.;
- c. Make sure all isolations are removed and permits are signed off and closed out; and

d. Confirm all required documentation and training of new installations, including safety processes have been undertaken with all relevant stakeholders.

Section 9 – Records Management

Records of any person who is trained in identification and safe handling of, and suitable control measures for, asbestos and ACM, other than license holders, must be kept for 5 years after the worker ceases working for the University. Health and air monitoring reports must be kept as a confidential record for at least 40 years after the record is made and identified as a formal record for the particular worker.

Section 10 - Review

In order to ensure that these Procedures continue to be effective and applicable to the university, the Contractor Safety Procedures will be reviewed every 3 years by the Director, Property Services in consultation with the key stakeholders. Conditions which might warrant a review of the Procedures on a more frequent basis would include:

- a. reported hazards or injuries;
- b. non-conforming systems; and/or
- c. Health and Safety Representative concern.

Following the completion of a review the Procedures and Induction documents will be amended as necessary.

Status and Details

Status	Current
Effective Date	10 th September 2021
Review Date	3 rd October 2022
Approval Authority	Vice Chancellor
Approval Date	26 th June 2021
Expiry Date	25 th June 2024
Head of Work Unit	Danika Head Director, Property Services
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