

**Design
for a better
future /**

Saint Mark's College

Asbestos Management Plan

Benedict Primary Campus
455 The Terrace,
Port Pirie,
SA 5540

Register No: 9235A

Project No: PS139842-106

Client No: A10100007

wsp

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Asbestos Management Plan

Saint Mark's College
Benedict Primary Campus
PS139842-106

WSP

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Reviewed by:	Claire Howard	30/10/2024	
Approved by:	Claire Howard	30/10/2024	

This Asbestos Management Plan must be read in conjunction with the Asbestos Register/s for the Workplace. Where the Asbestos Register is updated the Asbestos Management Plan must be reviewed and as necessary revised, a review must be undertaken at least every 5 years.

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Emergency procedure

Accidental damage or discovery of new asbestos-containing material

If an uncontrolled situation or incident occurs where known or suspect asbestos containing material is disturbed or there are other possible asbestos related issues the following steps are to be followed:

Step	Who	Actions
1 Stop work	Worker (or others) discovers or suspects ACM has been damaged or new item identified	Stop work immediately. Go to Step 2.
2 Restrict access to affected area and shut off air-handling system	Contractor or worker supervisor	Restrict access to the area by closing doors, taping off access points and installing temporary signage to prevent site occupants or members of the public from entering the immediate area, and to prevent any further disturbance of asbestos materials in the area. Air handling systems should be shut-off (where relevant). Go to Step 3.
3 Notify the management plan controller	Contractor or worker supervisor	Notify the Asbestos Management Plan (AMP) Controller: Property Management - (08) 8633 8800 Or WSP (08) 8405 4300 Go to Step 4.
4 Implement Incident Notification Process	AMP Controller	Licensed Asbestos Assessor (LAA) to assess situation, contact WSP for advice. Management Plan Controller-notify by telephone and email, key stakeholders as per in-house incident notification process. Inform on-site staff/personnel. Go to Step 5.
5 Notify Licensed Asbestos Assessor	AMP Controller	AMP Controller-Notify Licensed Asbestos Assessor (LAA) to arrange risk assessment and advise appropriate control strategies. Go to Step 6.
6 Risk assess damage and sample material (if required)	Licensed Asbestos Assessor	LAA to attend site to risk assess material and if necessary, take sample of suspected asbestos materials: Notify AMP Controller result of analysis Negative result-Resume works Positive result-Go to step 7



<p>7 Engage licensed asbestos removal contractor for clean-up</p>	<p>Management plan controller (in consultation with licensed asbestos assessor)</p>	<p>Management Plan Controller (in consultation with Licensed Asbestos Assessor) to engage a Licensed Asbestos Removal Contractor to undertake asbestos clean up and decontamination works. Go to Step 8.</p>
<p>8 Conduct asbestos fibre air monitoring and independent visual clearance inspection</p>	<p>Licensed asbestos assessor</p>	<p>Licensed Asbestos Assessor to conduct asbestos fibre air monitoring adjacent to the contaminated work area to ensure that fibre levels do not exceed acceptable levels and controls are effective. After clean-up works have been completed, an independent visual clearance inspection shall be conducted by a Licensed Asbestos Assessor to ensure that asbestos removal/make safe has been completed to a satisfactory standard. Airborne asbestos fibre clearance monitoring shall also be conducted as required within removal work areas to ensure areas are safe for re-occupation following removal/make safe. Licensed Asbestos Assessor to issue clearance documentation. Go to Step 9.</p>
<p>9 Staff Debrief/Review AMP procedures and controls</p>	<p>Management Plan Controller/Licensed Asbestos Assessor</p>	<p>Debrief staff Management Plan Controller and Asbestos Consultant to review the Asbestos Management Plan procedures and controls to ensure they were being followed correctly. Go to Step 10.</p>
<p>10 Update Asbestos Register and archive documents</p>	<p>Asbestos Consultant/Management Plan Controller</p>	<p>As required, update site Asbestos Register. Management Plan Controller-to archive incident documents and re-issue the up-dated Asbestos Register for the site/building.</p>

If for any reason the Management Plan Controller cannot be contacted, please call WSP on (08) 8405 4300



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1 Introduction

WSP Australia Pty Limited (WSP) was engaged by Saint Mark's College ("the client") to prepare this Asbestos Management Plan. This Asbestos Management Plan must be read in conjunction with the Asbestos Register/s for the Workplace. The asbestos register related to this Asbestos Management Plan provides specific information about the location, description and risk of identified and assumed material among other information for the property located at Saint Mark's College, Benedict Primary Campus – 455 The Terrace, Port Pirie, SA 5540.

2 Purpose of this asbestos management plan

Asbestos risk to human health is acknowledged as being present when airborne asbestos fibres are inhaled. Inhalation of asbestos fibres can lead to respiratory disease. Therefore, all Asbestos Containing Materials (ACM) should remain undisturbed and in good condition until removal is conducted under controlled conditions.

The purpose of this Asbestos Management Plan (AMP) is to ensure that all practicable steps are taken to prevent, or minimise the risk of exposure to airborne asbestos fibres, for all occupants and contractors. This is driven by legislation, regulations and guidance offered by codes of practice and supported by an understanding of sound management of ACM.

Sound management practices are achieved by the identification and listing of the known locations of the ACM in an Asbestos Register. An asbestos register is drafted following building, structure, or plant and equipment inspection with sampling and subsequent analysis by a National Association of Testing Authorities (NATA) accredited laboratory of the suspect ACM. Following this risk assessment, the implementation of appropriate controls regarding the management of confirmed ACM can commence.

This AMP has been prepared in accordance with the Safe Work Australia Code of Practice – ‘How to Manage and Control Asbestos in the Workplace’ (Feb 2024) and the SA Work Health & Safety Regulations 2012.

As an organisation, we aim to satisfy or exceed the requirements specified in legislation, and encompasses the following principles:

- The ultimate goal is for the site to be free of ACM.
- Consideration will be given to removal of ACM where practicable. This is in preference to other control measures such as enclosure, encapsulation or sealing. Removal is to be undertaken in a programmed, planned and controlled manner.
- Where reasonably practicable, steps are to be taken to label identified ACM.
- Control measures are to be established to prevent exposure to airborne asbestos fibres (including monitoring the condition of ACM and minimising the possibility of damage to ACM).
- All workers, contractors and other persons are to be made aware of the Asbestos Register and the Asbestos Management Plan before commencing work at the site.
- As required, asbestos awareness training and instruction is to be provided, including information about the consequences of exposure to airborne asbestos fibres.

The Asbestos Register specific to this site is:

WSP asbestos register number	9235A
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2.1 Regulatory requirements

A person with management or control of a workplace must ensure that a copy of the asbestos management plan for the workplace is readily accessible to:

- a worker who has carried out, carries out or intends to carry out, work at the workplace.
- a health and safety representative who represents a worker
- a person conducting a business or undertaking who has carried out, carries out or intends to carry out, work at the workplace

- a person conducting a business or undertaking who has required, requires, or intends to require work to be carried out at the workplace.

An AMP is required at a workplace where asbestos is known to be located at that workplace, and where there is an asbestos register. The regulatory requirement for an asbestos register, and therefore an AMP does not apply if:

- The workplace is a building that was constructed after 31 December 2003.
- No asbestos has been identified at the workplace.
- No asbestos is likely to be at the workplace from time to time.

Whilst it is not a requirement under the regulations to have an AMP at a workplace where no asbestos has been identified, it is however good practice to have an AMP in the event that asbestos materials are located or suspected during works that may uncover otherwise hidden materials.

2.1.1 AMP review requirements

A person with management or control of a workplace that has an asbestos management plan must ensure that the plan is reviewed and as necessary revised in the following circumstances:

- There is a review of the asbestos register or a control measure.
- Asbestos is removed from, or disturbed, sealed or enclosed at the workplace.
- The plan is no longer adequate for managing asbestos or ACM at the workplace.
- A health and safety representative requests a review.
- At least once every 5 years.

2.1.2 Asbestos register review requirements

Typically, asbestos register reviews (updates) are conducted annually, as a risk assessment of each ACM situation. In accordance with the South Australian WHS Regulations, asbestos registers must be reviewed/updated whenever the management plan is reviewed, whenever further asbestos is identified or when asbestos materials are removed, disturbed, sealed or enclosed, or before demolition or refurbishment.

In the event of further asbestos products being located at the property, the asbestos register must be reviewed/updated.

Should demolition or refurbishment be undertaken, the asbestos register must be reviewed prior to any demolition or refurbishment work is undertaken, and as necessary revised. If refurbishment is likely to disturb ACM or demolition or disposal of sections or the entire structure are to occur, as far as reasonably practicable all ACM is to be removed prior to works commencing.

3 Objectives of this asbestos management plan

The AMP represents an integrated risk management approach to ensure that practicable steps are taken to prevent or minimise the risk of exposure to airborne asbestos fibres.

This AMP therefore:

- Outlines the necessary actions to control the risk as required by legislation.
- Identifies and describes the administrative line of authority for the site, outlining responsibilities, procedures and systems for the effective management and control of ACM's.
- Details emergency procedures to be followed if an uncontrolled situation or incident occurs where known or suspect ACM's are disturbed.
- Establishes a timetable for the review and assessment of the ACM's.
- Where appropriate, instigates a work permit system, which ensures that any proposed maintenance, installation, alteration, renovation or demolition at the site is notified to the Management Plan Controller.
- Requires that all participants involved in the management and operations at the site/s, particularly where ACM is likely to be disturbed are clearly informed and as necessary trained to manage the asbestos risks.

The asbestos register forms an integral part of an effective AMP and both documents should be read in conjunction. The AMP and Asbestos Register must be made available as required for inspection by employers, employees, union representatives, government representatives, contractors and maintenance personnel.

4 Legislative requirements and references

This AMP is designed to assist in the general obligations relating to asbestos management to ensure the health and safety of employees, contractors, visitors and others accessing the site. The AMP also addresses specific asbestos related legislative requirements and guidelines in relation to industry best practice.

Comprehensive asbestos management protocols and regulatory requirements are detailed in the following legislation and guidance documents and all form an integral part of this AMP:

- SA Work Health and Safety Act 2012
- SA Work Health and Safety Regulations 2012
- “How to Manage and Control Asbestos in the Workplace - Code of Practice” (Feb 2024)
- “How to Safely Remove Asbestos” - Code of Practice (Feb 2024)
- “Demolition Work” - Code of Practice (June 2020)

5 Asbestos overview

Asbestos is a naturally occurring crystalline fibrous mineral silicate found in rocks and are commonly referred to by the colour of the fibres, as "blue asbestos", "brown asbestos" and "white asbestos". There are two major groups of asbestos:

- 1 Serpentine group minerals:
 - Chrysotile (white asbestos)
- 2 Amphibole group minerals:
 - Amosite (brown asbestos)
 - Crocidolite (blue asbestos) and minor forms, including:
 - Actinolite
 - Tremolite
 - Anthophyllite.

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

Asbestos mainly affects the lungs and breathing in high levels of asbestos fibres over time can lead to a number of diseases and cancers (asbestos is a known carcinogen). The aim is to prevent or reduce the risk of exposure to airborne asbestos fibres to as low as reasonably practicable. This management plan aids in ensuring that asbestos containing materials in the workplace are managed in such a way that they do not become damaged and lead to an increased risk of exposure.

5.1 Types of asbestos-containing materials

Asbestos containing materials can be classified into two categories:

1 Friable

Asbestos containing materials considered to be friable are materials that can be crumbled, pulverised or reduced to powder by hand pressure when dry. Friable asbestos materials are considered a higher risk as they more readily liberate asbestos fibres causing them to become airborne, with minimal disturbance.

2 Non-Friable (Bonded)

Those that cannot be pulverised or reduced to a powder with hand pressure are considered non-friable and generally considered a lower risk if properly handled. Non-friable asbestos containing materials are often referred to as 'bonded', where asbestos is bound in a bonded matrix (e.g. fibre cement sheeting) or various resin/binders (e.g. vinyl floor tiles). Typical examples of ACM's and their category are listed in Table 5.1

Table 5.1 Friable or non-friable

Friable	Non-friable (bonded)
<ul style="list-style-type: none"> — Asbestos Contaminated Dust (ACD). Dust that has settled within a workplace and is (or assumed to be) contaminated with asbestos. — Sprayed or troweled asbestos materials applied to ceilings, walls and other surfaces for fire-rating purposes. This material is often referred to as ‘limpet asbestos’. — Asbestos-containing insulation on pipes, boilers, tanks, ducts etc. which is often referred to as asbestos lagging. — Asbestos paper products, millboard in electrical switchboards, asbestos rope to spark arresters or underlay lining for linoleum or vinyl floor coverings. — Asbestos textiles, braided asbestos, rope, tape, gaskets etc. (note that rope and millboard are potentially friable). — Asbestos millboard from inside auxiliary switchboxes/fuse boards or air-conditioning reheat boxes. — Low density board or asbestos insulation board. 	<ul style="list-style-type: none"> — Asbestos cement sheeting and corrugated sheeting products, i.e. cement-like or concrete-like products (e.g. ‘fibro’ and ‘super six roofing’ –see description below). — Vinyl tiles and vinyl flooring mastic and associated adhesives. — Asbestos containing compounds, mastic from mechanical fittings, and roofing membranes and gaskets (In some cases gaskets may be friable). — Electrical switchboards containing compressed asbestos bituminous electrical boards, asbestos-cement sheeting and components such as arc shields. — Roofing sealants, bituminous membranes, tar composites and similar materials were occasionally mixed with asbestos materials. — Construction expansion joint mastics in walls and floors.

It should be noted that extensive weathering or deterioration can cause previously bonded materials to release friable material e.g. asbestos contaminated dust and gutter residues. This non-bonded state increases their potential to release airborne asbestos fibres.

In Australia, asbestos was used widely in the construction of houses and commercial and industrial properties from the 1930s onwards with the peak period of use in Australian buildings being from the 1950s to the 1970s. Asbestos use was gradually phased out in Australia in certain products from the late 1970s through to the late 1980s. The final national ban on the use, manufacture and importation of all asbestos products in Australia occurred in 2003.

Figure 5.1 classifies types of ACM’s according to the likelihood of airborne asbestos fibre release if the ACM is disturbed or deteriorates. The higher the item is on the list, the greater the potential risk to health from airborne asbestos fibres will be. However, it should be noted that any ACM has the potential to release fibres if disturbed.

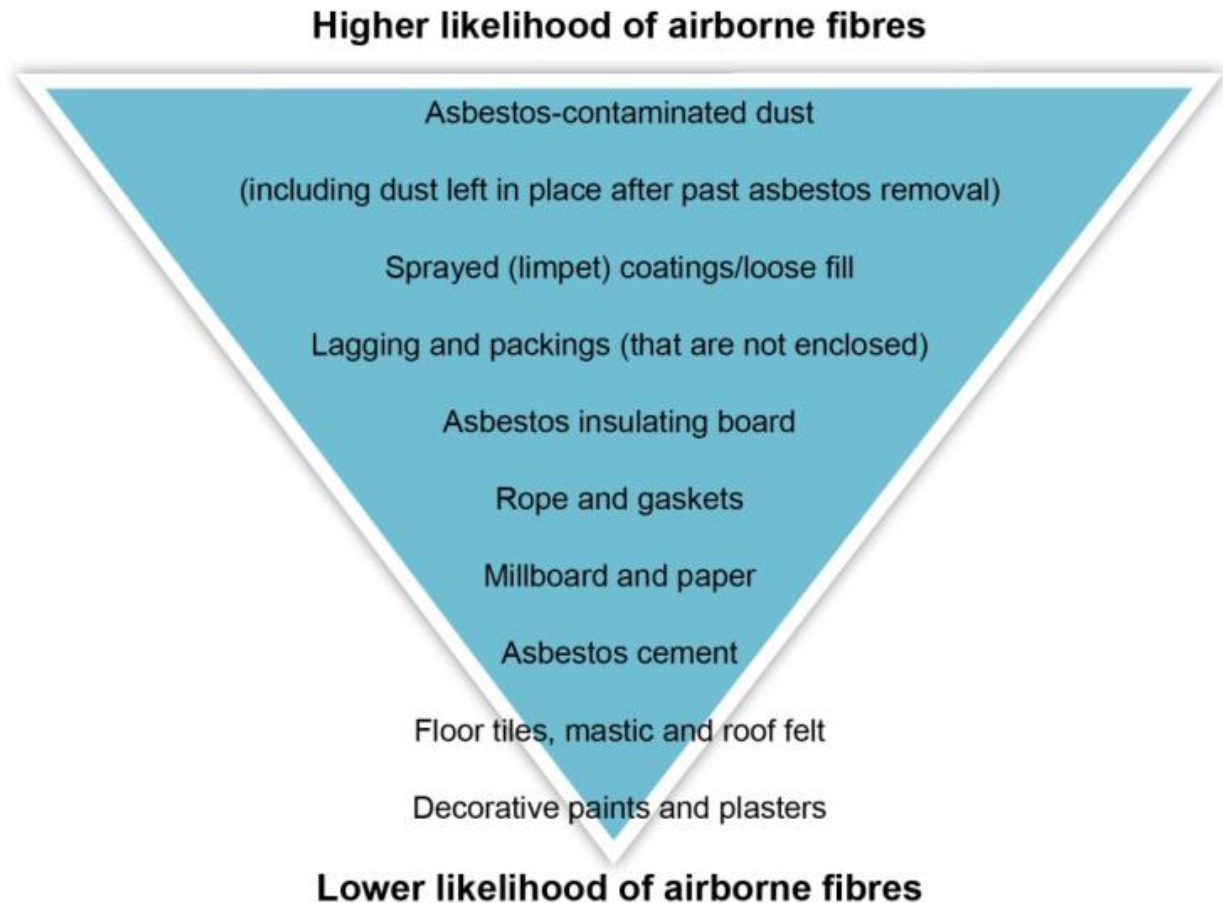


Figure 5.1 Extract from the Safe Work Australia “How to Manage and Control Asbestos in the Workplace (Feb 2024)” Code of Practice

5.2 Rating the risk of asbestos-containing materials

The presence of asbestos-containing materials (ACMs) does not necessarily constitute an exposure risk. However, if the ACM is sufficiently disturbed to cause the release of airborne respirable fibres, then an exposure risk may be posed to individuals. The assessment of the exposure risk posed by ACMs assesses (a) the material condition and friability, and (b) the disturbance potential. The assessment of the exposure risk posed by each ACM is assessed using the following criteria:

Material condition

The assessment factors for material condition include:

- Evidence of physical deterioration and/or water damage.
- Degree of friability of the ACM.
- Surface treatment, lining or coating (if present).
- Likelihood to sustain damage or deterioration in its current location and state.

Physical condition and damage

The condition of the ACM is rated as either being good, fair or poor.

- **Good** - refers to an ACM that has not been damaged or has not deteriorated.
- **Fair** - refers to an ACM having suffered minor cracking or de-surfacing.
- **Poor** - describes an ACM which has been damaged or its condition has deteriorated over time.

Friability and surface treatment

The degree of friability of ACMs describes the ease of which the material can be crumbled, and hence to release fibres, and takes into account surface treatment.

Friable asbestos

Friable asbestos or ACM is asbestos or ACM in powder form, or able to be crumbled, pulverised, or reduced to a powder by hand pressure when it is dry e.g. sprayed asbestos beam insulation (limpet), pipe lagging.

Non-friable asbestos

Also referred to as bonded asbestos, typically comprises asbestos fibres tightly bound in a stable non-asbestos matrix or impregnated with a coating. Examples of non-friable asbestos products include asbestos cement materials (sheeting, pipes etc.), asbestos containing vinyl floor tiles, compressed gaskets and electrical backing boards.

Disturbance potential

In order to assess the disturbance potential, the following factors are considered:

- Requirement for access for either building work or maintenance operations.
- Likelihood and frequency of disturbance of the ACM.
- Accessibility of the ACM.
- Proximity of the ACM to air plenums and direct air stream.
- Quantity and exposed surface areas of ACM.
- Normal use and activity in area, and numbers of persons in vicinity of ACM.

These factors are used to determine:

- The potential for fibre generation.
- The potential for exposure to person/s, as a rating of low, medium or high disturbance potential.

Risk status

The risk factors described previously are used to rank the asbestos exposure risk posed by the presence of the ACM:

- A low risk rating describes ACMs that pose a low exposure risk to personnel, employees and the general public providing they stay in a stable condition, for example asbestos materials that are in good condition and have low accessibility.
- A medium risk rating applies to ACMs that pose an increased exposure risk to people in the area.
- A high-risk rating applies to ACMs that pose a higher exposure risk to personnel or the public in the vicinity of the material due to their condition or disturbance potential.

Priority actions

The following priority rating system is adopted to assist in the programming and budgeting for the control of asbestos risk identified in the assessment.

Priority 1 (P1)	Action:	Restrict Access to Area & Organise Abatement Works as soon as practicable and manage any remaining materials.
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Area has ACMs, which are either damaged or are being exposed via continual disturbance. Due to these conditions, there is an increased potential for exposure and/or transfer of the material to other locations with continued unrestricted use of the area. Representative asbestos fibre monitoring should be conducted in the area during normal building operation where recommended. Prompt abatement of the asbestos hazard is recommended.

- As an interim, restrict access.

Priority 2 (P2)	Action:	Organise Remedial Works as soon as practicable and manage any remaining materials.
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Area has ACMs with a potential for disturbance due to the following conditions:

- 1 Material has been disturbed or damaged and its current condition, while not posing an immediate hazard, is unstable.
- 2 The material is accessible and when disturbed, can present a short-term exposure risk.
- 3 Demolition, renovation, refurbishment, maintenance, modification or new installations, involving air-handling systems, ceilings, lighting, fire safety systems or floor layout.

Appropriate abatement measures should be taken as soon as practicable. A negligible exposure risk exists if materials remain under the control of this Asbestos Management Plan (AMP).

- As an interim, restrict access.

Priority 3 (P3)	Action:	No Short-Term Remedial Works Required and review periodically.
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Area has ACMs, where:

- 1 The condition of friable ACMs is currently stable and has low potential of being disturbed.
- 2 The ACM is currently in a non-friable form, may have slight damage, but does not present an exposure risk unless cut, drilled, sanded or otherwise abraded.

This presents a low risk of exposure where the materials are left undisturbed under the control of this Asbestos Management Plan (AMP). Defer any major action unless materials are to be disturbed as a result of maintenance, refurbishment or demolition operations.

Priority 4 (P4)	Action:	No Short-Term Remedial Works Required and review periodically.
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Area has ACMs in a non-friable form and in good condition. It is unlikely that the material can be disturbed under normal circumstances and can be safely subjected to normal traffic. Even if it were subjected to minor disturbance the material poses a negligible health risk. These materials should be maintained in good condition and their condition monitored during subsequent reviews. As with any asbestos materials, these materials must be removed prior to renovations that may impact on the materials.

5.3 Plan for removal of asbestos-containing materials

Once a priority rating has been assigned to each ACM the material should be managed in accordance with the timetable provided in Table 5.2. This timetable details the action required and time scale for completion.

ACM's identified as presenting an elevated risk should be removed in accordance with Table 5.2, or earlier if appropriate. When ACM's have been removed from a site, it is a requirement under the SA WHS regulations that the asbestos register and AMP are revised and updated accordingly.

Table 5.2 Asbestos risk management timetable

Time frame		Less 12 months	12 to 36 months	>36 months
Priority Rating	P1	Immediate Removal Update Register	-	-
	P2	Plan for Removal Put Controls in Place	Update Register Removal	-
	P3	Put Controls in Place Leave and Manage	Update Register Plan for Removal	Update Register Removal
	P4	Leave and Manage	Update Register Leave and Manage	Plan for Removal Leave and Manage

The ultimate goal is to have a workplace free of ACM's, therefore eliminating the risk of exposure to airborne asbestos fibres completely.

6 Organisational responsibilities

This AMP is an operational document, designed in accordance with the Safe Work Australia ‘How to Manage and Control Asbestos in the Workplace’ Code of Practice to ensure that future works at the site do not result in uncontrolled asbestos-related exposure. All asbestos-related activities carried out at the site are to be carried out under the guidance of this AMP. The following key personnel are responsible for its implementation:

Management Plan Controller

The Asbestos Management Plan and Register Controller is responsible for administration and supervision of asbestos-related tasks at the site.

The following have been appointed as the Asbestos Management Plan and Asbestos Register Controller:

Asbestos Management Plan Controller	Contact details:
Saint Mark’s College	(08) 8633 8800

In the event that the Management Plan Controller is not available, please contact:

Contact details:	
WSP	(08) 8405 4300

The following tasks are to be conducted by the Management Plan Controller:

- Maintain the Asbestos Register for the site and ensure that the ACM are regularly re-assessed, and the information is kept up to date by a competent person to comply with current WHS legislation. It is recommended that the asbestos register be reviewed every 12 months and a visual inspection of identified ACM should be undertaken as part of any review.
- Ensure the asbestos register is reviewed/updated by a competent person (e.g. Licensed Asbestos Assessor) when:
 - this asbestos management plan is reviewed
 - further asbestos or ACM is identified at the workplace
 - asbestos is removed from, or disturbed, sealed or enclosed at, the workplace
 - prior to demolition or refurbishment. Refer to WHS Regulation, Chapter 8 Part 6, Demolition and Refurbishments.
- Ensure that if deemed necessary by a risk assessment, the frequency of the asbestos register review is appropriately increased.
- Maintain this AMP and ensure this AMP is reviewed by a competent person (E.g., Licensed Asbestos Assessor) when:
 - there is a review of the asbestos register or a control measure
 - asbestos is removed from, or disturbed, sealed or enclosed at, the workplace
 - the plan is no longer adequate for managing asbestos or ACM at the workplace
 - a health and safety representative requests a review
 - changes to management systems or the management plan controller relinquishes control of the AMP; or
 - at least once every 5 years.

- Liaise with tenants, contractors and maintenance personnel and ensure that all contractors whose work may impact ACM are informed of the presence of asbestos at the site.
- Engage a competent person to conduct asbestos inductions and asbestos awareness training for contractors, site management and other key personnel as necessary.
- In the event that remedial or maintenance works are to be carried out, ensure that a risk assessment with recommendations is performed by a competent person prior to any work with or adjacent to ACM.
- Engage a licensed asbestos removal contractor and an independent Licensed Asbestos Assessor as required by state legislative requirements to conduct asbestos removal works and provide airborne fibre monitoring and clearance inspections.
- Inform occupants of the building and any other buildings in the immediate vicinity of all asbestos remedial works and air monitoring results.
- Prior to renovation or demolition works, ensure materials identified as containing asbestos are safely removed by an appropriately licensed removal contractor from any proposed work area or appropriately contained so as to prevent accidental damage.
- Prior to renovation or demolition works contact WSP for recommendations regarding an intrusive/destructive asbestos inspection.
- Ensure exposure to asbestos is kept as low as reasonably achievable and that no person is exposed to airborne asbestos fibres in excess of the exposure standard.
- Ensure asbestos-related records are maintained with this AMP. File all asbestos related documentation on an on-going basis including asbestos register updates, asbestos removal specifications, asbestos removal control plans, air monitoring and clearance inspection certificates.

7 Asbestos register

WSP has prepared a comprehensive asbestos register. Please refer to the site-specific Asbestos Register which details the type, condition and location of known and assumed asbestos containing materials.

The asbestos register is used as a reference to detail specific locations of known or suspected ACM at the site. All personnel working at the site must be made aware of the presence of the ACM in the areas they are accessing and the absolute necessity to ensure that these materials remain undisturbed.

7.1 Register to be available

It is a requirement of the SA Work Health & Safety Regulations 2012 that a person with management and control of a workplace makes the current Asbestos Register of the site available to the following personnel:

- A worker who has carried out, carries out or intends to carry out, work at the workplace.
 - A health and safety representative who represents a worker.
 - A person conducting a business or undertaking who has carried out, carries out or intends to carry out, work at the workplace.
 - A person conducting a business or undertaking who has required, requires, or intends to require work to be carried out at the workplace.
-

7.2 Review or register before works

Should the Asbestos Register not adequately cover the area of the proposed works, further investigation by a competent person (Licensed Asbestos Assessor/Asbestos Consultant) must be conducted prior to commencing work.

The Asbestos Register must be updated if at any time conditions change to the current conditions in which the asbestos containing material is observed. It is considered industry best practice that annual re-inspections are conducted to risk assess ACM situations and ensure that any changes in conditions are identified, reported and appropriately managed.

7.3 Limitations of the asbestos management plan and asbestos register

The Asbestos Register describes the known, visible and accessible sources of ACM identified on site. Whilst the register was prepared with all due care and every attempt was made during the survey to locate all ACM, it is important to note that, without substantial demolition of the buildings, fittings and equipment, it is not possible to guarantee that every source of asbestos has been located. Inherent with the nature and construction of the building, are areas that are either not physically or visually accessible.

Such inaccessible areas fall into a number of categories:

- Inside set ceilings or wall cavities.
- Building facades or other height restricted areas.
- Those areas accessible only by dismantling equipment or performing minor local demolition works.
- Service shafts, ducts etc., concealed within the building structure or internal areas of the plant or equipment.

- Totally inaccessible areas such as voids and cavities created and intimately concealed within the building structure. These voids are only accessible during demolition works.
- Asbestos materials covered or concealed (partially or otherwise) by other materials/items preventing or limiting visual access or identification/recognition.
- Within inaccessible areas of plant, machinery or electrical equipment.
- Asbestos materials installed in non-typical applications, covered by other materials or installed in such a manner that disguises or conceals their nature in any way that may hinder their identification or recognition as an asbestos material.

Hence, it is possible that ACM concealed within inaccessible voids and areas may not have been detected.

It is important that personnel proceed with caution when opening up or entering any previously and normally inaccessible areas to avoid disturbing concealed and/or previously unknown ACM.

7.4 Signage and labelling – displaying of asbestos warning signs

The person with management or control of a workplace must ensure, where reasonably practicable, that the presence of ACM is identified and clearly indicated by a label. The site-specific asbestos register outlines existing signage and details any further recommendations for labelling of ACM's.

All labels should comply with AS1319 Safety Signs for the Occupational Environment. Some typical examples can be seen in

Figure 7.4. Warning signs that have been wrongly removed, encapsulated or painted over should be replaced.

The practicability of labelling non-friable asbestos items in public access areas should be carefully considered in relation to the potential risks of exposure. Labelling is not always considered appropriate for asbestos situations in occupied areas as signs warning of the presence of asbestos may cause unnecessary alarm and disruption. In this case it may be appropriate to apply General Awareness warning signs indicating that asbestos does exist on the site.

Figure 7.4. Asbestos awareness and signage examples



8 Inadvertent disturbance/newly suspected materials

Any damage to or the identification of newly suspected asbestos-containing material will require and initiate an update to the Asbestos Register.

8.1 Damage to asbestos-containing materials

Any damage to ACM's must be reported to the Asbestos Management Plan Controller immediately. The Management Plan Controller will instigate the appropriate corrective action.

It is important that the emergency procedure at the front of this asbestos management plan is adhered to. If only minor damage occurs, e.g. minor cracking to asbestos cement sheet, the Management Plan Controller may assess the damage and decide an appropriate course of action, which may be to simply seal any exposed edges with paint. Any more serious damage should be assessed by a Licensed Asbestos Assessor and may require remediation works by a licensed asbestos removal contractor.

8.2 Newly suspected asbestos-containing materials

If materials are encountered that are not listed in the asbestos register, unknown to the worker or suspected of containing asbestos, then it is imperative that work cease pending further investigation and sampling, and appropriate precautions for dealing with asbestos materials should be implemented.

Contact WSP (8405 4300) for asbestos identification and an on-site risk assessment and inspection.

If either of the above situations occurs, any work should immediately cease, and the Emergency Procedure for Accidental Damage or Discovery of New Asbestos-Containing Materials located at the front of this of this AMP must be followed.

All reports of damaged ACM are to be kept on file with the AMP.

8.3 Background airborne fibre monitoring

If ACM's have been identified during routine inspection as being friable and of a high or very high risk, consideration should be given to conducting airborne fibre monitoring (AFM) to determine if airborne asbestos concentrations are safe in regards to asbestos risk or if control measures have been or are effective.

Additionally, if evidence of airborne asbestos fibre concentrations is required for sites containing ACM's, background airborne fibre monitoring should be considered. AFM can be conducted to alleviate any doubt in regard to the asbestos risk caused by the ACM being present. All AFM results should be kept on file in the AMP.

9 Contractors and maintenance personnel

The Management Plan Controller must ensure that all contractors working at the site are inducted and made aware of the asbestos register and the AMP.

Contractors and maintenance personnel must ensure all inductions are completed and that proper safety procedures are followed. All works must be conducted in accordance with all relevant legislative requirements, this AMP and industry best practice.

9.1 Contractor and maintenance personnel asbestos induction

All contractors and maintenance personnel visiting the site must report to the Asbestos Management Plan Controller prior to commencing any works. The Management Plan Controller will provide a brief induction for the site, examine the works to be performed and advise what can, and cannot, be done. The induction will include the dissemination of the following information:

- Areas of the building that are known to contain ACM.
- Provide access to the asbestos register and AMP for the site to all contractors for reference prior to conducting works.
- The AMP provides direction on how to work safely with the ACM and work on site.
- Any asbestos abatement works must be approved by the Management Plan Controller and conducted by suitably qualified (licensed) asbestos removal contractors.
- During normal routine maintenance work, external contractors and other personnel must report any residual, deteriorating or damaged ACM (or suspected ACM) to the Management Plan Controller as soon as possible so that the appropriate corrective action can be initiated.
- There is no guarantee that all ACM's have been identified on site due to access limitations and any suspect materials encountered during building, demolition or maintenance works must also be reported to the Management Plan Controller. If any suspect materials that are not noted in the asbestos register are encountered, all work in the area must cease until the suspect material has been assessed by competent person (Licensed Asbestos Assessor/Asbestos Consultant/Occupational Hygienist).

Contractors and maintenance personnel should confirm they understand the requirements of the AMP and have read and understood the asbestos register and sign on to the form in Appendix A.

Details of contractors or other personnel who have attended the induction are to be kept on file.

9.2 Contractor responsibilities

Contractors working at the site must ensure all inductions have been completed prior to undertaking work.

All contractors should read and understand the site Asbestos Register and the AMP before any work is carried out. The acknowledgement form in Appendix A should be signed. Contractors must ensure proper safety procedures are followed and works are conducted in accordance with all relevant legislative requirements, this AMP and industry best practice.

If at any time a contractor discovers, in the area of work, the presence of asbestos or any loose fibrous materials that may contain asbestos, work must stop immediately. Access to the area must be restricted and the Emergency Procedures at the front of this AMP must be followed.

As a contractor of this site you are obliged by the SA Work Health & Safety Regulations 2012 to comply with the AMP that has been developed for this site. Your responsibilities also require you to inform the AMP Controller of the following:

- When planning refurbishment works at the site.
- Of maintenance or repair works on the buildings; or
- Any other works likely to disturb the building structure or fabric.

9.3 General works and maintenance activities

General day to day maintenance activities conducted by tenants or contractors that have been pre-determined as low risk activities do not require the written authorisation to proceed with onsite works from the Management Plan Controller.

It is a management directive that contractors and staff do not perform any works that will disturb ACM. A suitably licensed asbestos removal contractor and an independent Licensed Asbestos Assessor must be engaged for any work on ACM.

9.3.1 Pre-determined low risk activities

- Overpainting already painted/sealed asbestos cement sheeting in good condition.
- Replacing light globes in ceilings lined with asbestos cement sheeting in good condition.
- Cleaning (mopping/sweeping) of asbestos vinyl flooring in good condition.

Refer to the asbestos register for condition rating of identified items.

9.4 Controls on use of certain equipment

The SA WHS Regulations 2012 state that a Person Conducting a Business or Undertaking (PCBU) must not use, or direct or allow a worker to use, either of the following on asbestos or ACM:

- High-pressure water spray
- Compressed air

This does not apply to the use of a high-pressure water spray for firefighting or fire protection purposes.

A PCBU must not use, or direct or allow a worker to use, any of the following equipment on asbestos or ACM unless the use of the equipment is controlled:

- Power tools
- Any other implements that cause the release of airborne asbestos into the atmosphere

9.5 Management of in-situ asbestos

For maintenance or service work, removing asbestos and ACMs as a control measure prior to conducting work should be considered. If removal is not practical, prior to work commencing, ensure workers (including plumbers, electricians and carpenters) have access to the Asbestos Register and are aware that unidentified asbestos may be present in the area/s where they will conduct the work.

Precautions must still be taken by the worker to prevent contamination of themselves, others and the surrounding environment. This includes the use of PPE (P2 or P3 mask, coveralls etc.), the laying down of plastic immediately below removal area, the use of PVA and water sprays and HEPA filter vacuums during the work, wet wiping surfaces after completion and regulated disposal.

Appropriate information, training and instruction must be completed provided prior to undertaking maintenance of, or service work on, non-friable asbestos or ACM, fixed or installed before 31 December 2003.

10 Consultation in regard to asbestos

If ACM's are present or thought to be present in a workplace, there must be full consultation, information sharing and involvement by everyone in the workplace, including employees, workers, contractors and other personnel.

Consultation must be undertaken so far as is reasonably practicable, in accordance with the Work Health and Safety Act 2012 (SA) and the regulations, with workers and other PCBUs who carry out work, who are, or are likely to be, directly affected by a matter relating to asbestos. If procedures have been agreed, the consultation must be undertaken in accordance with the agreed procedures.

Consultation is required in relation to the following asbestos matters:

- When identifying asbestos hazards and assessing risks to health and safety arising from the work carried out or to be carried out.
- When making decisions about ways to eliminate or minimise asbestos risks.
- When proposing changes that may affect the health or safety of workers.
- When making decisions about the procedures for:
 - Monitoring the health of workers.
 - Monitoring the conditions at any workplace under the management or control of the PCBU.
 - Providing information and training for workers.

The Management Plan Controller must appoint a competent person, being a suitably qualified/experienced Licensed Asbestos Assessor/Asbestos Consultant to assist in the following areas:

- Conduct inspections to assess risk involved with proposed works where disturbance of ACM is likely to occur prior to commencing proposed works.
- Review the asbestos register as required by state legislation and industry best practice.
- Where appropriate, develop 'Scope of Works/Technical Specification' documentation for removal of ACM.
- Review a licensed asbestos contractors removal control plan prior to removal works.
- Provide occupational hygienist services during asbestos abatement works (e.g. smoke tests, airborne fibre monitoring and inspections).
- Review the AMP as required by state legislation and industry best practice.
- Provide asbestos awareness training.

11 Proposed refurbishment or demolition

It is a requirement under the SA WHS Regulations that the asbestos register be revised if it is inadequate for the proposed demolition or refurbishment. As previously stated there are limitations to a standard asbestos register due to access restrictions. Prior to any significant refurbishment or demolition works, further investigations must be performed using destructive/intrusive inspection and sampling techniques.

Contact WSP (8405 4300) for recommendations regarding an intrusive/destructive audit.

12 Removal of asbestos-containing materials

The ultimate goal of asbestos management is to have workplaces free of asbestos.

Where an initial risk assessment, routine re-inspection or intrusive audit indicates that an asbestos material is damaged or might be affected by proposed project works, arrangements must be made for the materials removal or repair. Removal of damaged or deteriorating ACMs from the workplace must be the first control measure implemented if it is reasonably practicable to do so. If it not reasonably practicable to remove an ACM, enclosure or encapsulation of the material can be undertaken in conjunction with any other control measures recommended by a competent person.

The removal of ACM's for large scale projects should be defined within a site-specific asbestos removal technical specification. This specification must be prepared in accordance with the Safe Work Australia 'How to Safely Remove Asbestos' Code of Practice February 2024 and should include:

- Location, type and extent of ACM to be removed
- Removal methods required
- Contamination control methods (negative air pressure/decontamination procedures)
- Air monitoring requirements

The technical specification will ensure that the licensed asbestos removal contractor has a full understanding of the site requirements and expectations of the client and enable them to produce a comprehensive site-specific Control Plan for the removal works.

As required by legislation, a person conducting a business or undertaking that commissions the removal of asbestos must ensure that the asbestos removal work is carried out by a licensed asbestos removalist who is appropriately licensed to carry out the work and an independent Licensed Asbestos Assessor is engaged to conduct airborne fibre monitoring and clearance inspections.

Asbestos abatement works must be performed in accordance with all legislative requirements. The statutory requirements for asbestos removal are prescribed in the SA Work Health & Safety Regulations 2012 and require compliance with the Safe Work Australia Code of Practice – 'How to Safely Remove Asbestos'.

It is an organisational directive: Any works involving the removal, encapsulation or otherwise abatement of ACM in any form or quantity, must be performed by a licensed asbestos removal contractor.

12.1 Licensed asbestos removal contractor

The Management Plan Controller will engage a suitably licensed asbestos removal contractor as prescribed by state legislation to conduct asbestos abatement works. The asbestos removal contractor must perform all works in accordance with licensing requirements and the Code of Practice – 'How to Safely Remove Asbestos', February 2024.

The asbestos removal contractor must develop a site-specific Asbestos Removal Control Plan before commencing any asbestos removal works. This should be submitted to the Management Plan Controller for review by a competent person prior to the commencement of works.

Removal of non-friable or bonded asbestos must be removed by either a Class A or Class B licensed asbestos removal contractor where the amount is greater than 10m². Friable asbestos materials must only be removed by a Class A licensed asbestos removal contractor (regardless of quantity). As prescribed by the SA Work Health & Safety Regulations 2012, only a Class A licensed asbestos removal contractor can conduct works involving the removal of friable ACM that is more than minor contamination.

12.2 Licensed asbestos assessor

An independent Licensed Asbestos Assessor is required to conduct airborne fibre monitoring and clearance inspections both during and after notifiable licensed asbestos removal work. In addition, the hygienist/assessor can oversee the correct management of the removal to ensure regulatory compliance. The Independent Licensed Asbestos Assessor is engaged by the person commissioning the works and not by the licensed asbestos removal contractors. Clearance inspections and monitoring requirements are undertaken by WSP.

Contact: WSP (08) 8405 4300

13 Asbestos assessor consulting services

— **Prepare an Asbestos Removal Scope of Works Document**

An organisation may, and at its discretion, engage a suitably qualified asbestos consultant to prepare the technical documentation/specification to describe how the ACM is to be removed safely from the site.

— **Asbestos Removal Tendering Process**

An organisation may, engage a suitably qualified asbestos consultant to manage the asbestos removal tendering process on behalf of the building owner/client.

— **Review of Contractor Asbestos Removal Control Plan/SWMS**

The contractors Asbestos Removal Control Plan/SWMS should be reviewed to ensure it adequately covers the safe working requirements of the project. The Management Plan Controller may request a suitably qualified occupational hygienist undertake such a review.

— **Visual Inspections**

A suitably qualified Licensed Asbestos Assessor or occupational hygiene consultant must inspect the removal works and provide a clearance certificate for each work area following ACM removal. Further, the Management Plan Controller may require asbestos abatement works to be supervised on site full time by the consultant.

— **Asbestos Fibre Air Monitoring**

In accordance with SA WHS Regulations, air monitoring should be performed whenever ACM is being removed, to ensure the control measures are effective. The requirements for air monitoring must be established prior to commencement of works.

All asbestos fibre air monitoring must be conducted in accordance with the SafeWork Australia Guidance Note on the 'Membrane Filter Method for Estimating Airborne Asbestos Fibres' and should be conducted by a NATA accredited laboratory.

— **Bulk Sample Analysis**

Suspected ACM may from time to time be uncovered at the site (e.g. during demolition works). Where additional sample analysis is required, analysis will normally be by polarised light microscopy including dispersion staining. Other approved methods including X-ray diffraction may be used where required. All analysis work must be conducted by a NATA accredited laboratory.

14 Transport and disposal of asbestos waste

Waste containing asbestos must be stored and transported in a receptacle designed to prevent the release of its contents. This can include standard 200µm thick clear polythene labelled asbestos waste bags, suitably sealed and labelled drums or lined skips.

Asbestos waste must be disposed of at SA EPA licensed waste facilities. Asbestos removal contractor's vehicles must also be EPA licensed to transport asbestos waste

15 Asbestos awareness training

It is a regulatory requirement that asbestos awareness training is offered to relevant and applicable employees and contractors, that are directly involved with asbestos related work, or are likely to encounter asbestos containing materials and it is also recommended that those involved with decisions associated with asbestos management are trained to increase their awareness of asbestos management. The information should cover the following aspects:

- Background information on asbestos.
- Asbestos related health effects and risks (e.g. asbestos is only a health risk when disturbed, resulting in the release of asbestos fibres into the airborne environment which may be subsequently inhaled).
- Asbestos-related legislation.
- Sources and general locations of ACM at the site(s) (as noted in the asbestos register).
- An overview of the structure and function of the AMP (i.e. a summary of how asbestos issues are managed at the site/s).
- Responsibilities of the building owner, management, tenants, staff and contractors.

The training should be designed to serve a number of purposes:

- To increase the awareness and knowledge of building management personnel with respect to their statutory obligations in respect of the management of asbestos hazards at the site/s.
- To provide valuable introductory information to staff/contractors who may have a requirement to handle asbestos or enter areas where asbestos is present.
- To assist the employer in addressing their statutory duties in respect of providing information, instruction and training to those potentially exposed to risk.

WSP has developed Specific PowerPoint based asbestos awareness training packages to meet such training requirements.

Appendix A

Contractor acknowledgement sign on form

Asbestos Management Plan
Saint Mark's College
Benedict Primary Campus,
445 The Terrace, Port Pirie, SA 5540



