

Asbestos in Grounds, Asbestos Management Plan, Bronte Public School, Bronte, NSW

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NSW Public Works

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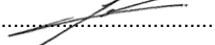
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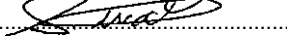
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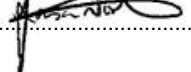
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Contents

Page Number

1. Introduction	1
1.1 Document Review	1
1.2 Background	1
1.3 Asbestos removal/clean-up works	2
2. Asbestos materials	3
2.1 Asbestos zone locations	3
2.2 Risk management	3
3. Asbestos register (Grounds)	4
4. Asbestos zone routine management	6
4.1 Inspections	6
4.2 Maintenance	6
4.3 Checklist	6
5. Asbestos zone maintenance works management	7
5.1 General	7
5.2 Sub-soil areas within school grounds	7
6. Permit for work	8
7. Legislative requirements	9
8. Safe work procedures for asbestos work	10

List of Tables

Table 3-1 Asbestos Register – Asbestos zones only for Bronte Public School

List of Figures

Site layout plans

Appendices

Appendix A Grounds management checklist

1. Introduction

1.1 Document Review

No Activity and/or no Re-occurrence of ACM in grounds on this site since 2008, as such the following is recommended:

This document is to be reviewed and updated

- when works occur on site
- when works occur on site which may cause grounds disturbance
- when any ACM in grounds is reported
- or every second year, if no activity.

1.2 Background

In February 2004, areas of possible asbestos impacted fill material were identified to the:

- **Area A** - Play area
- **Area B** - Embankment to South and West of play area
- **Area C** - Garden bed North West of Block H
- **Area D** - Garden bed South of Block B
- **Area E** - Stair undercroft adjacent Block H
- **Area F** - Area between Blocks H and E

at Bronte Public School, Hewlett St, Bronte, NSW 2024.

In order to manage the risk of exposure to asbestos, any fibrous cement fragments are to be removed from the ground surfaces (Refer to Section 1.3). The areas where fibrous cement fragments have been identified within the fill material (and further in-situ asbestos fragments may be present) have been designated as "asbestos zones".

In the previous ground inspection report, reference 2116240A.006/LT-8284/AP/kg dated 20 February 2004, it was proposed that once a pick up of fibrous cement fragments has been complete the following remediation measures be carried out.

Area A - Play area

- Excavate soil to a depth of approximately 300mm.
- Encapsulate the area with layer of geofabric followed by clean fill, crushed sandstone, topsoil turf and /or hard stand material as appropriate.

Area B - Embankment to South and West of play area

- The area should be encapsulated using mulch garden beds.

Area C - Garden bed North West of Block H

- The area should be encapsulated using raised mulch garden beds.

Area D - Garden bed South of Block B

- The area should be encapsulated using mulch garden beds. Access to the area may need to be restricted.

Area E - Stair undercroft adjacent Block H

- The area should be encapsulated with a hard stand material.

Area F - Area between Blocks H and E

- This area should be encapsulated with topsoil and turf and/or hard stand material as appropriate.
- Appropriate drainage should be installed to prevent further erosion caused by stormwater.

This report outlines the plan for management of the identified asbestos impacted areas (zones), and should be read in conjunction with the existing Department of Education and Communities (DEC) Asbestos Management Plan for all other identified asbestos materials within the school.

1.3 Asbestos removal/clean-up works

From the information provided to PB, from the DEC on 14 March 2008, it appears that the asbestos removal/clean up works comprised only the following:

- **Areas A, C and D** – Remediate using a variety of methods including: removing trees, installing geofabric, installing raised mulch garden beds, installing drainage, and alter fencing to redirect student traffic.
- **Area B** – Remove trees, install geofabric, install raised mulch garden beds and install retaining wall to the Western embankment.
- **Area E** – Encapsulate the area with concrete.
- **Area F** – Install geofabric and mulch garden beds.

The remediated areas are shown in Figure 1.

2. Asbestos materials

2.1 Asbestos zone locations

Asbestos cement fragments may be present as a component of buried fill within the asbestos zone areas. Refer to Figure 1 site plan. A hygienist should be engaged to determine whether the asbestos within the Asbestos Zones is considered *non friable* or *friable* in accordance with the NSW WorkCover Authority 'Working with Asbestos, 2008'. This contains safety guidelines and requirements for work involving asbestos.

2.2 Risk management

The in-situ asbestos within the asbestos zones can be classified as low risk provided that the following measures are undertaken:

- The control measures installed are fully maintained.
- The in-situ asbestos remains undisturbed.
- An asbestos management plan remains in effect.
- Any works undertaken on or near the asbestos zones are to be under the control of a permit to work where the contractor has acknowledged the presence of asbestos and has prepared a safe work method statement(s) to ensure that asbestos is not disturbed and therefore airborne asbestos fibres are not generated.

3. Asbestos register (Grounds)

Table 3-1 outlines the findings of the inspection of the grounds indicating the areas requiring management.

Table 3-1 Asbestos Register – Asbestos zones only for Bronte Public School

Event	Location	Description of Material	Extent	Condition	Risk Status	Control Priority	Control Recommendation/Comments
School Grounds*							
A	Play area	Possible buried asbestos cement fragments	Throughout – below ground surface	Unknown	Low	Low	Provide repair to surface coverage by excavating down 300 mm and install turf or hardstand material as appropriate. Do not disturb soil surface. Inspect every three months or after adverse weather conditions for signs of surface wear and possible fragments at surface
B	Embankment to South and West of play area	Possible buried asbestos cement fragments	Throughout – below ground surface	Unknown	Low	Low	Provide repair to surface coverage using mulched garden beds as appropriate. Do not disturb soil surface. Inspect every three months or after adverse weather conditions for signs of surface wear and possible fragments at surface
C	Garden bed North West of Block H	Possible buried asbestos cement fragments	Throughout – below ground surface	Unknown	Low	Low	Provide repair to surface coverage using raised mulched garden beds as appropriate. Do not disturb soil surface. Inspect every three months or after adverse weather conditions for signs of surface wear and possible fragments at surface
D	Garden bed South of Block B	Possible buried asbestos cement fragments	Throughout – below ground surface	Unknown	Low	Low	Provide repair to surface coverage using mulched garden beds as appropriate. Do not disturb soil surface. Inspect every three months or after adverse weather conditions for signs of surface wear and possible fragments at surface

E	Stair undercroft adjacent to block H	Possible buried asbestos cement fragments	Throughout – below ground surface	Unknown	Low	Low	Provide repair to surface coverage using hardstand material as appropriate. Do not disturb soil surface. Inspect every three months or after adverse weather conditions for signs of surface wear and possible fragments at surface
F	Area between Blocks H and E	Possible buried asbestos cement fragments	Throughout – below ground surface	Unknown	Low	Low	Provide repair to surface using turf or hardstand material as appropriate. Appropriate drainage may be required. Do not disturb soil surface. Inspect every three months or after adverse weather conditions for signs of surface wear and possible fragments at surface

* Refer to Figure 1 for detail of area locations

Risk assessment factors

Low risk: Asbestos materials that pose a low health risk to personnel, employees and the general public provided they remain undisturbed.

Medium risk: Asbestos 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.

High risk: Asbestos 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.

4. Asbestos zone routine management

4.1 Inspections

In order to monitor the effectiveness of the on-site asbestos zone management, it is essential that the affected areas are regularly inspected. Visual inspections of the asbestos remedial measures should be carried out to ensure that they are maintained adequately. Such inspections should occur on the following occasions:

- at three monthly intervals (e.g. a walkover of remediated areas to ensure that applications of mulch and turf, etc. have been maintained)
- after a period of prolonged heavy rain (e.g. a walkover of remediated areas to ensure that applications of mulch and turf, etc. have not been disturbed by heavy rain)
- whenever damage or disturbance has been reported (e.g. a walkover of remediated areas to ensure that applications of mulch and turf, etc. have not been disturbed by events such as vehicle movements).
- whenever works are about to commence that may cause grounds disturbance

Should areas be identified where encapsulating measures appear to be damaged or are no longer effective, these areas should be re-covered immediately. Some remedial measures such as the installation of layers of mulch and top soil will require ongoing maintenance to ensure that a sufficient barrier layer is in place.

4.2 Maintenance

All remediation measures carried out in the affected areas must be maintained as per their original application. In particular:

- All surface cover/treatments within the asbestos zones must be fully maintained at all times. For example, mulch levels should remain as per their original application, turf should be maintained to ensure full coverage and any other measures should be maintained in a good condition.
- All hard standing surfaces must be maintained and re-instated should any works that disturb them be carried out.
- If any portion of an affected area is found to be damaged (i.e. the surface cover has been damaged so that it has resulted or may result in the soil becoming exposed), the DEC local Asset Management Unit (AMU) should be contacted immediately.

4.3 Checklist

A checklist of site management requirements is presented in Appendix A of this document. This checklist should be used whenever walkover inspections are carried out and where maintenance issues have been raised. The checklist is specific to the requirements of the grounds at Bronte Public School and sets out the frequency of inspections required. It is recommended that a hard copy of the check-list retained by the school and field copies are taken on-site when required.

5. Asbestos zone maintenance works management

5.1 General

An Asbestos Management Plan (AMP) has been implemented for all NSW state schools and educational facilities. The plan includes procedures for managing friable asbestos and working on asbestos. A generic permit to work template will also be included in the management plan which will be able to be used where any work is required that may disturb asbestos materials within an asbestos zone.

5.2 Sub-soil areas within school grounds

- Any contractor, maintenance person, Department of Commerce, Department of Education & Communities must acknowledge the presence of buried asbestos cement materials within these areas. A copy of the asbestos register must be made available to any such person prior to commencing work.
- Any contractor, maintenance person, Department of Commerce, Department of Education & Communities or other authorised person who may potentially disturb the soil surface must complete a permit to work or similar form that ensures that any work will not disturb the buried asbestos.
- If work is to be carried out in grounds that will disturb or potentially disturb the buried asbestos, the contractor, maintenance person, Department of Commerce, Department of Education & Communities or other authorised person must engage a licensed asbestos removal contractor with a friable asbestos licence to undertake the work. The licensed contractor should prepare a safe work method statement detailing procedures that ensure that personnel working in the asbestos zones and any other persons within the school will not be exposed to asbestos fibres. The work area must be completely enclosed and work undertaken out of school hours.
- Work in progress asbestos air monitoring should be carried out during any work that disturbs or could potentially disturb the buried asbestos and/or the soil surface. 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.
- 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.

6. Permit for work

Any contractor who proposes to work in any of the asbestos zones where asbestos may be disturbed or the ground surface may be broken must complete a permit to work form.

Before a permit to work is issued, individuals will be required to read and understand the AMP, as well as copies of the relevant asbestos registers. Individuals must be aware of their legal obligations in relation to health and safety as specified in the Work Health and Safety Act 2011 and the Work Health and Safety Regulation 2011.

Permits to work are 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 the use of personal protective equipment (PPE), the installation of barricading and/or airborne fibre monitoring, are necessary.

When the work is completed, or the permit to work expires (whichever occurs first), the permit shall be signed and returned to the DEC Facility Manager for cancellation after that Manager has checked a safe situation exists.

The DEC local AMU shall be advised immediately of any incidents of non-compliance with the AMP.

In accordance with the interpretation of the NSW WorkCover Authority published in 'Working with Asbestos,' Guide 2008, a hygienist should be engaged to determine whether the buried asbestos is considered *non-friable* or *friable*. Therefore, any fibrous cement materials or other suspected asbestos-containing materials excavated should be inspected by a hygienist to determine if it's friable. This means that any such asbestos should be worked on only by contractors with an appropriate asbestos licence and a project specific permit issued by WorkCover NSW.

7. Legislative requirements

The following legislative requirements will apply to asbestos zone maintenance works:

- All asbestos removal and disposal work shall be carried out in accordance with the requirements of the WorkCover NSW Guidelines for Licensed Asbestos Removal Contractors
- The asbestos contractor shall notify WorkCover NSW of the proposed work at least 5 days prior to the commencement of any work in accordance with NSW Occupational Health and Safety Regulation 2011. However this time period may be waived in the case for DEC properties
- All work shall be carried out in strict accordance with the NSW Work Health and Safety Act 2011, the NSW Work Health and Safety Regulation 2011, How to Safely Remove Asbestos – Code of Practice 2011, and the Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres, 2nd Edition [NOHSC 3003 (2005)].

8. Safe work procedures for asbestos work

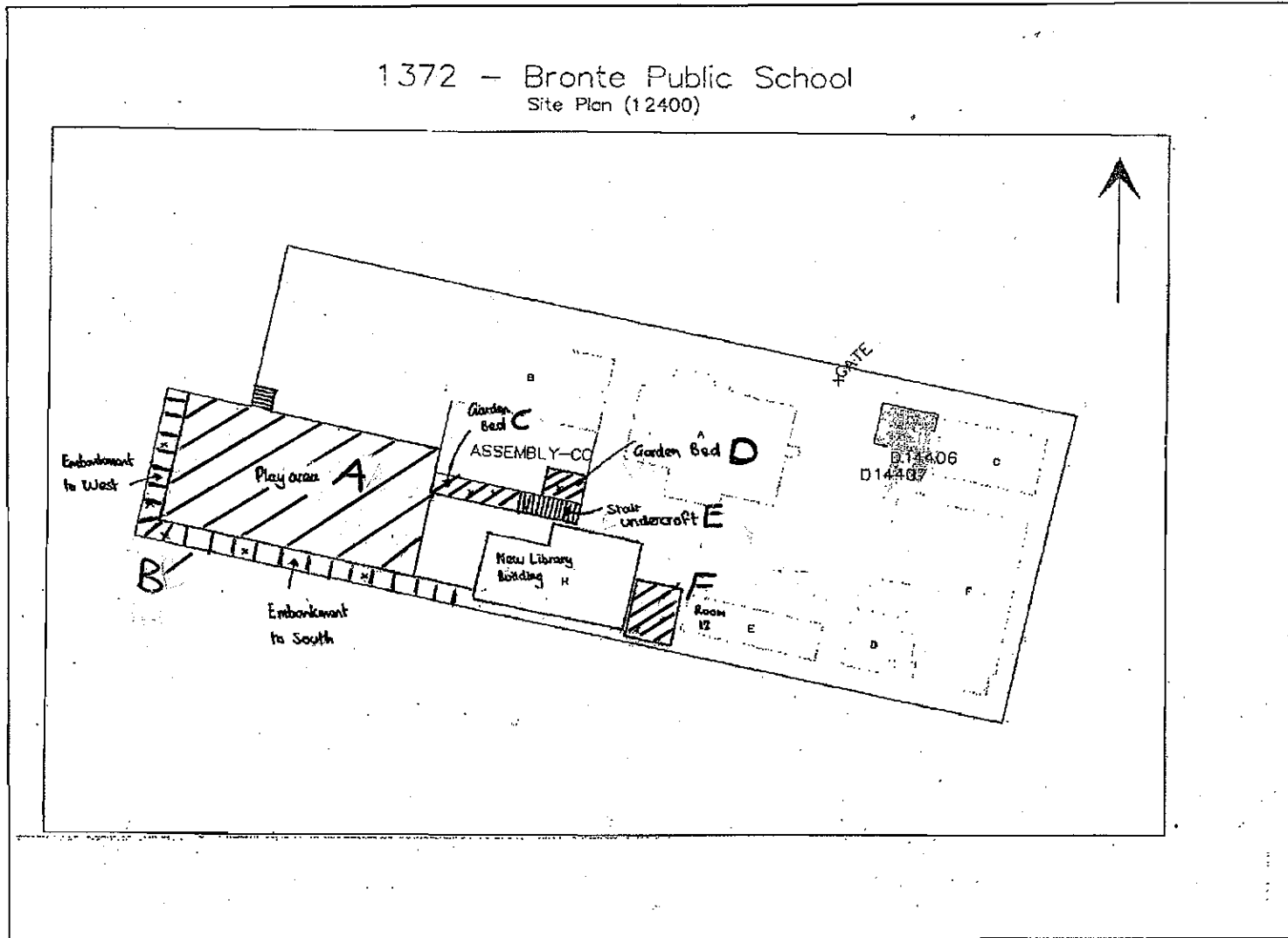
The following safe work procedures will apply for asbestos work:

- The removal contractor must develop a site-specific asbestos removal plan before commencing the asbestos work. Such a plan must be prepared in accordance with Section 3 of the Work Safe Australia- How to safely remove asbestos: Code of Practice 2011.
- Only personnel who have been trained in work procedures for the safe removal of asbestos shall work on asbestos.
- A trained, experienced operator must remain on duty outside the removal area and/or enclosure (if installed) at all times that asbestos removal is in progress. Curricula vitae for all persons undertaking asbestos removal works must be submitted to the Principal prior to the commencement of work on the sites.
- Removal of asbestos must generally be carried out by wet removal techniques. That is, as the asbestos material becomes accessible during the removal process, it shall be thoroughly wetted down. Care must be exercised to prevent excessive use of water. The contractor will be held responsible for any water damage
- Decontamination facilities and procedures shall be undertaken to the complete satisfaction of a hygienist
- Any signage existing prior to removal must be re-affixed to any new or existing assembly
- The contractor must ensure that persons in the work area(s) are not exposed to fibre levels greater than those stated in the National Exposure Standard for the type of asbestos being removed.

Figures

Site layout plans

Bronte Public School Sketch Plan



Appendix A

Grounds management checklist

Bronte Public School grounds asbestos management checklist – Routine three monthly inspections

Table 1 Routine monthly inspection checklist

		Annual inspections	Initial inspection	Subsequent three-monthly inspections			
Area	Location description		Date:	Date:	Date:	Date:	Date:
A	Play area	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					
B	Embankment to South and West of play area	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					
C	Garden bed North West of Block H	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					
D	Garden bed South of Block B	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					
E	Stair undercroft adjacent block H	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					
F	Area between Blocks H and E	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					

Bronte Public School grounds asbestos management checklist – Incident inspections (e.g. after heavy rain or disturbance)

Table 2 Incident inspection checklist

		Incident inspections	Date of inspection				
Area	Location description		Date:	Date:	Date:	Date:	Date:
A	Play area	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					
B	Embankment to South and West of play area	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					
C	Garden bed North West of Block H	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					
D	Garden bed South of Block B	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					
E	Stair undercroft adjacent block H	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					
F	Area between Blocks H and E	Surface cover adequate (Y/N)					
		Suspected asbestos materials visible (Y/N)					