Douglas PARTNERS

GROUNDED EXPERTISE

# Hazardous Building Materials (HAZMAT) Report, 17 Denison Street, Gloucester NSW

**Prepared for Department of Planning, Housing and Infrastructure**

**Project 228674.00**

**5 July 2024**

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# Document History

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The undersigned, on behalf of Douglas Partners Pty Ltd, confirm that this document and all attached drawings, logs and test results have been checked and reviewed for errors, omissions and inaccuracies.

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Douglas Partners acknowledges Australia's First Peoples as the Traditional Owners of the Land and Sea on which we operate. We pay our respects to Elders past and present and to all Aboriginal and Torres Strait Islander peoples across the many communities in which we live, visit and work. We recognise and respect their ongoing cultural and spiritual connection to Country.

# Executive Summary

Douglas Partners Pty Ltd (Douglas) was engaged by Department of Planning, Housing and Infrastructure (DPHI) to conduct a Hazardous Building Materials (HAZMAT) survey of the building(s) at 17 Denison Street, Gloucester NSW (the Site).

The purpose of the HAZMAT survey, which comprised a destructive/intrusive visual inspection with limited program of testing and analysis, was to identify HAZMAT prior to building demolition. For the purposes of this assessment HAZMAT comprise:

- Asbestos containing material (ACM);
- Lead paint;
- Lead dust in ceiling cavities;
- Synthetic Mineral Fibre (SMF) insulation; and
- Polychlorinated biphenyls (PCB) in fluorescent light fittings.

HAZMAT were identified or suspected present in the building at the Site as indicated in Table 1 below.

**Table 1: Hazardous Building Materials (HAZMAT) Risk Profile**

| Building | Non-Friable Asbestos | Friable Asbestos | Lead Paint | Lead Dust | SMF | PCB |
|---|---|---|---|---|---|---|
| 17 Denison Street | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

SMF = synthetic mineral fibre, PCB = polychlorinated biphenyls, ✓= identified or suspected present, × = not identified and / or not suspected present. Refer to the Register(s) in Appendices B to E for details / clarification.

Limited or no access was available to certain areas of the Site at the time of inspection, as discussed in Section 6 of the report. Inaccessible areas should be assumed to potentially contain HAZMAT unless assessment of these areas by a Competent Person confirms otherwise.

HAZMAT should be managed in accordance with the requirements of the NSW Work Health and Safety (WHS) Act 2011 (WHS Act), NSW WHS Regulation 2017 (WHS Regulation) and relevant Codes of Practice, Australian Standards and Guidelines.

HAZMAT should be removed prior to any significant disturbance including from maintenance, refurbishment and demolition work.

Limitations apply to this HAZMAT assessment and report as outlined in Section 8

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# Hazardous Building Materials (HAZMAT) Report, 17 Denison Street, Gloucester NSW

## 1. Introduction

Douglas Partners Pty Ltd (Douglas) was engaged by Department of Planning, Housing and Infrastructure to conduct a Hazardous Building Materials (HAZMAT) survey of the buildings at 17 Denison Street, Gloucester NSW (the Site).

The purpose of the HAZMAT survey, which comprised a visual inspection undertaken using a limited rage of destructive/intrusive techniques, as well as a program of testing and analysis, was to help identify occurrences of HAZMAT prior to building demolition. For the purposes of this assessment HAZMAT comprise:

- Asbestos containing material (ACM);
- Lead paint;
- Lead dust in ceiling cavities; and
- Synthetic mineral fibre (SMF) insulation; and
- Polychlorinated biphenyls (PCB) in fluorescent light fittings.

The overall results of the assessment are indicated by the HAZMAT Risk Profile in Table 1 of the Executive Summary. A Site Plan is provided in Appendix A.

The results of the assessment, including details of the HAZMAT identified, the results of ACM risk assessments, and associated photographs, are provided in the HAZMAT Register (the Register) in Appendix B.

Laboratory certificate(s) of analysis are provided in Appendix C.

Limited or no access was available to certain areas as outlined in the Register and Section 7 of this report (including Table 4).

## 2. Site Description

The Site is located at the corner of Denison Street and Billabong Lane, Gloucester as indicated on the Site Plan (Drawing 1) in Attachment A. The building at the Site comprises a single-storey commercial premises formerly used as a fuel station / workshop. The building includes a retail area with service counter, tool store, offices, associated workshop/warehouse areas and amenities. The following building areas are recognised on the Site Plan in Attachment A and should be referred to when examining the Register:

- Eastern building;
- Southern building; and

- Western Building (Dunlop Tyres).

## 3. Regulatory Framework

In NSW, occupational health and safety is regulated under the NSW Work Health and Safety Act 2011 (WHS Act) and the NSW Work Health and Safety Regulation 2017 (WHS Regulation). The WHS Act and WHS Regulation place a broad range of responsibilities on key stakeholders to promote and secure the safety and health of persons in the workplace. The WHS Regulation also outlines specific requirements pertaining to the identification, assessment and control of asbestos and other hazardous materials in the workplace.

In addition to the WHS Act and WHS Regulation there are a range of Codes of Practice, Guidance Notes, Australian Standards and other guidelines relating to the management of HAZMAT in the workplace including their removal and disposal. These include (as updated / replaced from time to time):

- SafeWork NSW *Code of Practice: How to Manage and Control Asbestos in the Workplace*;
- SafeWork *NSW Code of Practice: How to Safely Remove Asbestos*;
- National Occupational Health and Safety Commission (NOHSC) *Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres, 2nd Edition* [NOHSC:3003(2005)];
- AS/NZS 4361.1 – 2017, *Guide to hazardous paint management – Lead and other hazardous metallic pigments in industrial applications*;
- AS/NZS 4361.2 – 2017, *Guide to hazardous paint management – Lead paint in residential, public and commercial buildings*;
- SafeWork NSW *Safe management of synthetic mineral fibres (SMF) – glasswool and rockwool* (information guide);
- Safe Work Australia *Guide to Handling Refractory Ceramic Fibres*, December 2013;
- Protection of the Environment Operations (POEO) Act 1997 and associated regulations;
- NSW EPA *Polychlorinated Biphenyl (PCB) Chemical Control Order*, 1997;
- Environment Protection and Heritage Council *Polychlorinated Biphenyls Management Plan*, *Revised Edition*, April 2003;
- NSW *Protection of the Environment Operations (Waste) Regulation* 2014; and
- NSW Environment Protection Authority (EPA) *Waste Classification Guidelines, Part 1: Classifying Waste*, November 2014 (EPA, 2014).

## 4. Method

This HAZMAT survey comprised a walkthrough visual inspection with limited program of testing and analysis. The inspection included the use of simple, non-powered hand tools (i.e., hammer, pinch bar, screwdriver and pliers) and associated destructive/intrusive inspection techniques to access selected, discrete locations where HAZMAT were thought likely to be hidden. The aim of the assessment was to identify occurrences of HAZMAT prior to building demolition.

Samples of suspected ACM were collected by Douglas using hand tools (e.g., knife or pliers) and analysed for asbestos by a National Association of Testing Authorities (NATA) accredited laboratory. Sample size and locations are typically limited to minimise disturbance of the material and potential functional or aesthetic impacts. The samples were analysed by polarised light microscopy (PLM) with dispersion staining in accordance with AS4964-2004 *Method for the qualitative identification of asbestos in bulk samples*.

Paints were screened for lead using 3M™ LeadCheck™ colouerimetric swabs which provide an indication of the presence of lead. Bulk samples of paint were also analysed for lead (% w / w) by a NATA accredited laboratory. Analysis was by Inductively Coupled Plasma - Atomic Emission Spectrometry / Mass Spectrometry (ICP-AES / MS) and / or Cold Vapour / Atomic Absorption Spectrometry (CV / AAS). Analysis results typically reflect the average lead content of the overall paint system at the location sampled.

Where ceiling cavity dust is sampled, this is conducted using surface wipes or bulk sampling techniques. Samples are generally collected from a surface area of 100 or 900 $cm^2$ and analysed for lead (total, µg) by a NATA accredited laboratory. Analysis results are then used to determine the lead loading (mg / $m^2$).

The testing and sample analysis regimes adopted comprise a screening assessment only and are not designed to delineate the extent of HAZMAT or hazard areas.

A selection of fluorescent light fittings were visually inspected and an assessment of PCB content made based on the capacitor and ballast details identified.

Limitations apply to this report and the assessment methods adopted and, therefore, Douglas cannot guarantee that all HAZMAT or issues of concern have been identified.

## 5. Asbestos Risk Assessment

ACM poses a health risk if asbestos fibres are released to the atmosphere and inhaled. There is also a risk of environmental contamination whenever asbestos is disturbed. The degree of risk associated with any given ACM depends on a range of factors such as the friability, extent, condition, and location / accessibility of the material, the asbestos mineral type(s) present, the nature of site activities and ventilation.

The asbestos risk assessment method employed by Douglas considers several key factors that influence risk and a numerical score is assigned to each (refer Table 2 below). These scores are then added together to determine an overall risk rating for the ACM (refer Table 3 below). A degree of professional judgement may be applied when determining the final risk scores and rating since, for example, it is not practicable to include in Table 2 all risk factors that may be relevant to a given situation.

Risk assessments for ACM should be reviewed on a regular basis including when:

- The Asbestos Management Plan is reviewed;
- Further asbestos or ACM is identified at the workplace;

- Asbestos is removed, disturbed, sealed, enclosed or undergoes any other change in condition;
- There is evidence that the risk assessment is no longer valid;
- There is evidence that control methods are not effective; or
- A significant change is proposed for the workplace or for work practices or procedures relevant to the risk assessment.

An asbestos risk assessment review is to be conducted at least every five (5) years. The review is to be performed by a Competent Person.

## Table 2: Key Risk Factors

| Risk Factor | Score | Description |
|---|---|---|
| **Friability** | 0 | Non-friable (fibre reinforced vinyls, bituminous materials, adhesives) |
| | 1 | Non-Friable (fibre reinforced cement products such as wall and roof sheeting) |
| | 2 | Semi-Friable (low density insulation board, millboard, ropes, paper, textiles, gaskets or highly weathered asbestos cement) |
| | 3 | Friable (thermal insulation to pipes/boilers, sprayed insulation, loose fill insulation) |
| **Condition** | 0 | Very Good. Very little or no visible indication of damage. Structurally sound. No significant repairs required. Material performs as intended. |
| | 1 | Good – Minor damage in small, localised areas. Structurally sound. Minor preventative action may be required as a precaution and / or to prolong material life. Material generally performs as intended. |
| | 2 | Fair. Localised damage in various areas. Material is generally structurally sound however local removal and replacement of damaged sections may be required. Material performance may be somewhat impaired in areas. |
| | 3 | Poor. Material exhibits significant damage throughout. Overall structural stability may be compromised. Material performance is significantly impaired. |
| **Treatment** | 0 | Fully enclosed, encapsulated or sealed. ACM is entirely contained, and the enclosure/encapsulation/sealing material is in good condition. |
| | 1 | Generally enclosed, encapsulated or sealed. ACM is generally contained however enclosure/encapsulation/sealing material may not be completely continuous or exhibits minor damage/penetrations. |
| | 2 | Partially enclosed, encapsulated or sealed. ACM is contained in area(s) however enclosure/encapsulation/sealing material is not present, significantly damaged or ineffective in area(s). |
| | 3 | Enclosure/encapsulation/sealing material is significantly damaged and / or generally ineffective or there is no treatment. |
| **Accessibility** | 0 | The ACM is not directly accessible to occupants. Contact is highly unlikely unless a significant, dedicated effort is made. Substantial demolition, dismantling and / or special access equipment would be required. |
| | 1 | The ACM is generally not accessible to occupants. Contact is unlikely but could be made with special tools or equipment (e.g., elevating work platform) or minor demolition/dismantling. |
| | 2 | Some portion(s) of ACM are accessible to occupants. Direct contact may occur periodically but often requires basic tools/equipment (e.g., step ladder). |
| | 3 | The majority of the ACM is accessible to occupants. Direct contact is a common occurrence and may be made with minimal effort or unintentionally. |
| **Activity** | 0 | Area generally not occupied. Normally very little or no activity. Activities may be highly restricted, or the area secured. Examples may include subfloor voids, ceiling cavities, confined spaces and other inaccessible areas. |
| | 1 | Low level occupancy. Some activity in parts or area only occupied periodically. Examples may include plant rooms and storerooms. |
| | 2 | Moderate level occupancy. Activity normally present throughout area. May include offices, laboratories, classrooms, workshops, and warehouses. |
| | 3 | High level occupancy. Generally high levels of activity. Activities may be wide-ranging and / or largely unrestricted. Examples may include production/manufacturing areas, construction sites and public areas/thoroughfares. |
| **Ventilation** | 0 | Exterior area where natural ventilation and associated dilution is largely unlimited. Significant retention and / or build-up of airborne contaminants is unlikely. |
| | 1 | Interior area. Natural ventilation and dilution are limited but area is not particularly confined. Limited retention and / or build-up of airborne contaminants is possible. |
| | 2 | Confined areas where ventilation and associated dilution is significantly limited. Significant retention and / or build-up of airborne contaminants is possible or likely. |
| | 3 | Asbestos material subject to direct ventilation (e.g., inside an AC system or near a fan or air exhaust) which may result in disturbance and / or elevated fibre concentrations in air. |

**Table 3: Risk Rating**

| Overall Score | Risk Rating | Description |
|---|---|---|
| 15-18 | High (H) | The ACM poses an elevated and typically unacceptable risk of exposure and / or environmental contamination. Controls should generally be implemented as soon as possible to address the risk. Removal of the whole or part of the ACM is typically required. Other controls such as enclosure, encapsulation and / or sealing may also be necessary if portion(s) of ACM are to remain in place. As an interim measure, access to the area should be appropriately restricted. Air monitoring is often recommended to confirm airborne asbestos concentrations and provide a written record for future reference. |
| 10-14 | Moderate (M) | The ACM poses a moderate risk of exposure and / or environmental contamination. Often there has been minor damage or there is potential for disturbance / degradation in the foreseeable future. Consideration should be given to implementing appropriate controls in the short to medium term to address the risk(s) and / or prolong the lifespan of the material. Relevant controls typically include enclosure, encapsulation and / or sealing. Extensive removal is generally not required, and the material can generally be managed on site if desired and serving a useful purpose. |
| 0-9 | Low (L) | The risk of exposure and environmental contamination is generally low while the material remains undisturbed and in its present condition. The material may generally remain in place without the requirement for significant, material-specific control measures such as removal, enclosure, encapsulation or sealing. |

**Note:** If the ACM is likely to be disturbed (e.g., by maintenance, refurbishment, or demolition work) and / or is no longer serving a useful purpose then the ACM should generally be removed. All ACM should be clearly identified with a label / signage where reasonably practicable.

# 6. Results

## 6.1 General

The overall results of the assessment are summarised in Table 1 in the Executive Summary of this report. Further details of the HAZMAT identified at the site, including the results of asbestos risk assessments, are provided in the Register in Appendix B.

Limited or no access was available to certain areas as outlined below (including Table 4) and in the Register in Appendix B.

**Table 4: Access Limitations***

| Location / Area | Access Type | Reason(s) |
|---|---|---|
| Areas / materials at height (e.g., roofs, upper walls / facade) | Limited | Access limited to safely accessible areas and use of 1.8 m multi-fold ladder. Works at height and use of specialised access equipment were not included in the scope of this assessment. |
| Confined spaces (e.g., interior of pits and tanks) and crawl spaces | Nil | Access to confined spaces and crawl spaces was outside the scope of this assessment. This includes various pits located within the building. |
| Ceiling cavities | Limited | Access generally limited by the number, location and height of access point(s), degree of clearance within the cavities, the location / extent of building structure and services etc. |
| Subfloor void(s) | Nil | Generally inaccessible due to limited number / location of designated entry points and degree of clearance within voids (generally crawl space only). Access to crawl spaces was outside the scope of this assessment. |
| Fluorescent light fittings, internal components | Limited | A selection of fluorescent light fittings was inspected to assess capacitor and ballast details. Access was limited to light fittings due to height in areas. |
| Potentially energised plant, equipment and services (e.g., electrical panels). | Nil | Access was outside the scope of this assessment. and requires certified isolation, de-energisation and lock-out confirmed on-site by a qualified / licensed technician or similar. |
| Subsurface areas including building footings and contamination in soil / fill / mulch etc. | Nil | Not included in the scope of this assessment. |

* Refer also to the Register (Appendix B).

## 7. Recommendations

A summary note and / or recommendation for each HAZMAT identified or suspected present in the buildings at the Site is provided in the Register (Appendix B). The general recommendations in Section 7.1 onwards are provided for informative purposes and should be considered including where the relevant HAZMAT has been identified or suspected present by Douglas or is subsequently suspected present based on reasonable grounds.

Any inaccessible areas (refer Table 4 in Section 6 and the Register in Appendix B) may potentially contain HAZMAT until confirmed otherwise by a Competent Person.

The presence of identified and suspected HAZMAT in the buildings at the Site, and the potential presence of any as-yet undetected HAZMAT, should be considered during the risk assessment for any proposed work at the Site or Site use. In particular, where HAZMAT are identified / suspected

present in one particular area of a building they may also be present in other similar areas of the same building.

### 7.1 General

HAZMAT should be:

- Managed in accordance with the requirements of the WHS Act, WHS Regulation and subordinate Codes of Practice, Australian Standards, and guidelines;
- Visually inspected on a regular basis. Any change to the condition of the material or relevant site conditions should be reported; and
- Removed prior to any significant disturbance such as maintenance, refurbishment, and demolition work.

A HAZMAT management plan, and scope of work specification for any planned abatement, should be developed to aid compliance with the requirements of the WHS Act and Regulation including those that relate to the identification of hazards and control of associated risks.

HAZMAT abatement work should be appropriately monitored and / or audited to help ensure quality and compliance.

An appropriate level of stakeholder consultation and communication should be undertaken at all times to help ensure that all relevant operational and project risks associated with HAZMAT are adequately controlled.

The scope, fees, and terms / conditions applicable to any HAZMAT work, including abatement, should be carefully assessed by a suitably qualified, experienced, and competent person to help ensure that associated costs remain within reasonable limits. Such assessment should include consideration of the fees that may apply to the management and control of any unexpected or additional finds.

HAZMAT work, including abatement, should be conducted and supervised by personnel that are adequately qualified, trained and experienced to identify any additional HAZMAT encountered in a timely manner that precludes the risk of exposure and cross-contamination.

Prior to any work involving HAZMAT a risk assessment should be conducted and Safe Work Method Statement (SWMS) developed. The SWMS should outline the controls necessary to ensure that the risks of exposure and environmental contamination are adequately controlled.

HAZMAT remediation and removal work should be undertaken in controlled conditions.

Waste should be assessed and classified for disposal in accordance with relevant legislation and EPA (2014).

At the completion of HAZMAT abatement and / or removal work a clearance inspection should be conducted by a Competent Person, or in the case of friable asbestos, by a Licensed Asbestos Assessor.

### 7.2 Asbestos-Containing Material (ACM)

Asbestos and ACM must be managed in accordance the WHS Regulation, the SafeWork NSW *Code of Practice: How to Manage and Control Asbestos in the Workplace* and the SafeWork NSW *Code of Practice: How to Safely Remove Asbestos.*

Exposure to airborne asbestos in the workplace must be eliminated to the extent reasonably practicable. If it is not reasonably practicable to eliminate exposure, it must be minimised to the extent reasonably practicable.

An Asbestos Management Plan must be developed to enable compliance with the WHS Regulation (Clause 429).

The presence and location of asbestos or ACM identified at a workplace must be clearly indicated by a label if it is reasonably practicable to do so.

Warning labels and signs should be consistent with the examples provided in the SafeWork NSW *Code of Practice: How to Manage and Control Asbestos in the Workplace* and comply with AS 1319 *Safety Signs for the Occupational Environment*.

Non-friable ACM that are structurally intact and in good to fair condition may typically remain in place provided that they are not significantly disturbed.

Tools and equipment that generate dust must generally not be used on asbestos or ACM. These include high-speed abrasive power and pneumatic tools (e.g., angle grinders, sanders, saws and high-speed drills, brooms, and brushes).

Tools and equipment that cause the release of asbestos, including power tools and brooms, may only be used on asbestos if the equipment is enclosed and / or designed to capture or suppress asbestos fibres and / or the equipment is used in a way that is designed to capture or suppress asbestos fibres safely. In such a case, other controls including PPE may also be required based upon the results of a pre-work risk assessment and the SWMS adopted.

The use of high-pressure water spray and compressed air on asbestos or ACM is specifically prohibited under the WHS Regulation.

If ACM become damaged, they should be repaired or removed and replaced with an alternative, non-asbestos building product as soon as possible.

The scope of asbestos removal work should be outlined in a technical specification (i.e., Scope of Work Report) developed by a Competent Person (in the case of non-friable asbestos) or a Licensed Asbestos Assessor (in the case of friable asbestos).

Removal of friable asbestos must only be undertaken by a Class A licensed asbestos removalist. Removal of 10 $m^2$ or more of non-friable asbestos must only be undertaken by a Class A or Class B licensed asbestos removalist.

Air monitoring, including background, control, and clearance monitoring, is a mandatory requirement during removal of friable asbestos. Air monitoring should also be considered during

removal of non-friable asbestos particularly where sensitive receptors exist such as at schools, hospitals, in public areas and at similar sites.

Air monitoring must be undertaken in accordance with the National Occupational Health and Safety Commission (NOHSC) *Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres, 2nd Edition* [NOHSC:3003(2005)].

All air monitoring samples must be analysed by a NATA accredited laboratory that holds accreditation for the required analysis.

At the completion of licensed asbestos removal work, a clearance inspection must be conducted by a Competent Person (for non-friable asbestos removal) or a Licensed Asbestos Assessor (for friable asbestos removal).

Air monitoring and clearance inspections must be performed by person/s independent of the licensed asbestos removalist.

All waste should be classified for disposal in accordance with relevant legislation and EPA (2014). Asbestos waste is preclassified as Special Waste under EPA (2014).

Asbestos transporters and facilities receiving asbestos waste must report the movement of asbestos waste to the EPA. Entities involved with the transport or disposal of asbestos waste in NSW, or arranging the transport of asbestos waste in NSW, must use the EPA's applicable online tool (WasteLocate / Integrated Waste Tracking Solution).

All asbestos waste must be disposed at a waste collection facility licensed to receive asbestos waste. All disposal receipts should be retained.

A person who relinquishes management or control of the workplace must ensure that the asbestos register is given to the person, if any, assuming management or control of the workplace.

### 7.3 Lead Paint

The potential presence of lead paint(s) should be considered during the risk assessment for any proposed works. Additional, targeted sampling and analysis for lead paints should also be considered prior to any work that may result in significant disturbance of paint system(s).

Lead paints should be managed in accordance with the WHS Regulation (including Chapter 7, Part 7.2 Lead) and:

- AS/*NZS* 4361.1 - 2017, *Guide to hazardous paint management - Lead and other hazardous metallic pigments in industrial applications*; and
- AS/NZS 4361.2 - 2017, *Guide to hazardous paint management - Lead paint in residential, public and commercial buildings*.

Generally, when one or more tests from a building or portion of a building indicate that lead is present, the paint(s) should be treated as lead paint. Further, a project should not be classified as free of lead unless all samples within the relevant area / building are proven to be free of lead and the sampling is comprehensive.

Lead paint that is in sound condition, not directly accessible (e.g., over-painted with lead-free paint) and unlikely to be disturbed may not require any immediate action.

Area(s) of lead paint that are in poor condition (e.g., flaking, delaminating) should generally be removed along with any lead paint debris and associated dust.

Exposed area(s) of lead paint that are intact may be stabilised by over-painting with a lead-free paint, or by covering with a suitable encapsulant. Stabilisation can provide an interim to long-term solution to a lead paint hazard.

The lead paint removal method and control measures adopted should be determined by risk assessment and a detailed knowledge of the workplace and proposed use / activities.

Exposure to airborne lead must be maintained below the relevant SWA exposure standards pertaining to lead. The SWA 8-hour Time Weighted Average (TWA) exposure standard for lead (inorganic dusts and fumes) is 0.05 mg/m$^3$. Other exposure standards apply for substances such as lead chromate.

Air monitoring for lead may be required during lead paint remediation works based on risk assessment and the requirements to maintain airborne lead levels below the abovementioned exposure standards.

At the completion of lead paint removal, a clearance inspection should be conducted by a Competent Person. The Competent Person should determine the requirements for clearance including any air monitoring or sample analysis that may be required.

Lead paint waste should be assessed and classified for disposal in accordance with relevant legislation and EPA (2014).

Based on previous correspondence with the NSW EPA, Douglas understands that EPA (2014) does not consider AS/NZS 4361.1 or AS/NZS 4361.2, including the definition of lead paint therein, for waste classification assessment. As such:

- These standards have no bearing on how waste is classified in NSW; and
- Waste classification should be carefully considered and an appropriate degree of liaison with the NSW EPA may be required to help ensure correct waste classification.

All disposal receipts should be retained.

### 7.4 Lead Dust

Laboratory analysis results for lead in dust should be taken as an approximate indication of conditions only since sampling is limited and the concentration of lead in dust may vary considerably between locations within the same general area.

No recognised Australian guidelines have been identified by Douglas for the direct assessment of lead concentrations in ceiling cavity dust. Notwithstanding this, the United States Environmental Protection Authority (US EPA) *Review of Dust-Lead Post Abatement Clearance*

*Levels* (Final Rule) (86 FR 983), effective on 8 March 2021, outlines the following current / proposed Dust-Lead Clearance Levels (DLCL) for assessment of post-abatement dust-lead levels[1]:

- Floors: 10 µg / $ft^2$ (~0.1 mg / $m^2$) lead;
- Interior window sills: 100 µg/$ft^2$ (~1.0 mg / $m^2$) lead; and
- Window troughs: 400 µg / $ft^2$ (~4.3 mg / $m^2$) lead.

The above acceptance limits may be used as a guide when assessing lead concentrations in settled dust unless other recognised and reliable criteria apply in the relevant jurisdiction. As a precaution the abovementioned US EPA DLCL are often used by Douglas to identify potentially hazardous conditions that may require control.

Where the concentration of lead in dust exceeds the most relevant US EPA DLCL appropriate control and / or remedial measures may need to be identified via risk assessment and with a detailed knowledge of the workplace and proposed use / activities.

Where ceiling spaces and similar cavities are effectively enclosed and provide very limited or no opportunity for lead containing dust to enter occupied areas, the dust may typically remain in place. In such a case, access to the cavities should be suitably restricted and all entrances signposted with appropriate warning signs.

Any personnel required to enter building cavities or other areas containing lead in dust should undertake an appropriate risk assessment and develop a SWMS for the work. The SWMS must identify controls that ensure the risk of exposure to lead and environmental contamination remains at an acceptable level for the personnel entering the area and for occupants of the building and surrounds.

Consideration should be given to removal of lead containing dust including when:

- There is a significant risk of the lead entering occupied areas;
- Substantive disturbance is likely due to maintenance, refurbishment, demolition, or other reason; or
- Removal is a reasonably practicable means of eliminating the hazard.

Removal of lead dust should be undertaken by a suitably qualified and experienced removalist.

The lead dust removal method and control measures adopted should be determined by risk assessment and a detailed knowledge of the workplace and proposed use / activities.

Exposure to airborne lead must be maintained below the relevant SWA exposure standards pertaining to lead. The SWA 8-hour TWA exposure standard for lead (inorganic dusts and fumes) is 0.05 $mg/m^3$.

[1] National Archives, Federal Register, The Daily Journal of the United State Government, accessed at: https://www.federalregister.gov/documents/2021/01/07/2020-28565/review-of-dust-lead-post-abatement-clearance-levels, accessed on: 19 April 2022.

Air monitoring for lead may be required based on the results of risk assessment and the requirement to maintain airborne lead concentrations below the abovementioned exposure standard(s).

At the completion of lead dust removal, a clearance inspection should be conducted by a Competent Person. The Competent Person should determine the requirements for clearance including any air monitoring or sample analysis that may be required.

Lead waste should be assessed and classified for disposal in accordance with relevant legislation and EPA (2014). All disposal receipts should be retained.

### 7.5 Synthetic Mineral Fibre (SMF)

SMF insulation materials may generally remain in place providing that they are in good condition and unlikely to be disturbed.

To reduce the potential for disturbance, exposure, and environmental contamination SMF insulation materials may be isolated, enclosed or encapsulated. Higher risk materials, such as loose fill insulation, may also be removed and replaced if necessary.

SMF work is to be undertaken in accordance with the requirements of the WHS Regulation and subordinate Codes of Practice, Guidance Notes, and other documents. These include:

- SafeWork NSW *Safe management of synthetic mineral fibres (SMF) - glasswool and rockwool* (information guide);
- Safe Work Australia *Guide to Handling Refractory Ceramic Fibres, December 2013*; and
- Guidance Note on the Membrane Filter Method for the Estimation of Airborne Synthetic Mineral Fibres [NOHSC:3006(1989)].

Reference should also be made to the Australian Institute of Occupational Hygienists (AIOH) *Synthetic Mineral Fibres (SMF) And Occupational Health Issues, Position Paper* for guidance and information.

Where reasonable concern exists over possible respirable fibre concentrations in any application, the first step is often to confirm that the work practices, as recommended for the particular product, are being followed. Air monitoring may not be required when it has been clearly established that appropriate work practices are being carried out.

Notwithstanding the above, exposures to airborne SMF should not exceed the relevant Safe Work Australia (SWA) exposure standards outlined in Table 5 below.

**Table 5: SWA Exposure Standards for SMF**

| Standard Name | Time Weighted Average (TWA) Exposure Standard |
|---|---|
| Glass wool, rock (stone) wool, slag wool and continuous glass filament and low biopersistence Man Made Vitreous Fibres (MMVF) | 2 mg/m$^3$ (inhalable dust) |
| Refractory ceramic fibres (RCF), special purpose glass fibres and high biopersistence MMVF | 0.5 f/mL (respirable)<br>2 mg/m$^3$ (inhalable dust) |

SMF waste should be disposed at a licensed waste collection facility. Note that synthetic fibre waste (from materials such as fibreglass, polyesters, and other plastics) packaged securely to prevent dust emissions is pre-classified as General Solid Waste (non-putrescible) under EPA (2014).

All disposal receipts should be retained.

### 7.6 Polychlorinated Biphenyls (PCBs)

Prior to any significant disturbance, such as demolition, refurbishment or maintenance works, fluorescent light fittings should be electrically isolated and inspected in detail for components (e.g., metal canister-type capacitors and ballasts etc.) that may contain PCB's. Any components containing, or suspected to contain, PCB should be removed by a Competent Person.

Where PCB containing components have been identified / suspected present in a building they may also be present in other similar areas of the same building or in buildings of similar age / construction.

PCB-containing components should be managed in accordance with the general requirements of the WHS Regulation and relevant environmental laws and guidelines including:

- POEO Act 1997, associated regulations and the *Polychlorinated Biphenyl (PCB) Chemical Control Order 1997*; and
- *Polychlorinated Biphenyls Management Plan, Revised Edition, April 2003*, issued by the Environment Protection and Heritage Council (EPHC).

Any PCB-containing components that exhibit leakage should be removed and replaced by a Competent Person as soon as possible. Access to areas containing leaking components should be suitably restricted.

The conveyance and disposal of PCB material and PCB waste must be undertaken in accordance with the requirements outlined in the *Polychlorinated Biphenyl (PCB) Chemical Control Order* 1997. All disposal receipts should be retained.

## 8. Limitations

Douglas Partners (Douglas) has prepared this HAZMAT report for DPHI as described herein. The work was undertaken in accordance with Douglas' proposal reference 228674.00.P.001.Rev0 of 8 April 2024.

This report is provided for the exclusive use of the DPHI for this project only and for the purposes as described in the report. It should not be used by or relied upon for other projects or purposes on the same or other site or by a third party. Any party so relying upon this report beyond its exclusive use and purpose as stated above, and without the express written consent of Douglas, does so entirely at its own risk and without recourse to Douglas for any loss or damage. In preparing this report Douglas has necessarily relied upon information provided by the client and / or their agents.

The results provided in the report are indicative of the conditions on the Site only at the specific inspection, sampling and / or testing locations, and then only to the extent practicable and safely accessible at the time the work was carried out. Site conditions may change after Douglas' field inspection, sampling and testing has been completed.

Douglas' advice is based upon the conditions encountered during this investigation. The accuracy of the advice provided by Douglas in this report may be affected by undetected variations in site conditions across the Site between and beyond the inspection, sampling and / or testing locations. The advice may also be limited by budget constraints imposed by others or by site accessibility.

This report must be read in conjunction with all of the attached and should be kept in its entirety without separation of individual pages or sections. Douglas cannot be held responsible for interpretations or conclusions made by others unless they are supported by an expressed statement, interpretation, outcome or conclusion stated in this report.

This report, or sections from this report, should not be used as part of a specification for a project, without review and agreement by Douglas. This is because this report has been written as advice and opinion rather than instructions for construction.

Although the inspection, sampling and testing plan adopted for this investigation is considered appropriate to achieve the stated project objectives, there are necessarily parts of the Site that have not been inspected, sampled and / or tested. This is either due to undetected variations in conditions or to budget constraints (as discussed above), or to parts of the Site being inaccessible or unavailable, or to occupants, furnishings or stored items preventing access. It is therefore considered possible that HAZMAT, including asbestos, may be present in unobserved or untested parts of the Site, between and beyond the inspection, sampling and testing locations, and hence no warranty can be given that all HAZMAT have been identified.

Inspections are limited to areas that are safely accessible at the time of the inspection without undue damage to building finishes or disturbance of occupants. Inspections exclude hidden and inaccessible locations such as within building cavities, voids and enclosed sections of risers / shafts as well as materials encased within the building structure or located below the exposed ground surface (e.g., pipes, drains and formwork). In addition, residual asbestos materials (e.g., asbestos lagging to pipes and vessels) may remain undiscovered below newer, asbestos-free materials (e.g., preformed SMF insulation). Such residual asbestos materials may

not be identified without extensive intrusive investigation and / or dismantling / demolition work if at all.

Any disturbance of building materials, such as during refurbishment, maintenance or demolition work, may reveal additional HAZMAT.

Limitations apply to the laboratory analytical methods used. For example, it can be very difficult or impossible to detect the presence of asbestos in some bulk materials (e.g., vinyl tiles) using the polarised light microscopy analytical method, even after ashing or disintegration of samples. This is due to the small length or diameter of asbestos fibres present in the material or attributed to the fact that very fine fibres have been dispersed individually throughout the material.

While work is undertaken in a professional manner the nature of HAZMAT and the limitations of the method(s) used mean that we cannot guarantee that all HAZMAT or issues of concern have been identified. This report should therefore not be considered a definitive account of all HAZMAT that may be present at the Site.

Douglas personnel are not experienced, licenced or accredited quantity surveyors. Any quantities quoted in this report are initial, unmeasured estimates provided for rudimentary guidance only and should not be relied upon. The services of a licenced quantity surveyor should be engaged in order to determine reliable quantities.

The recommendations and conclusions contained in this report shall not abrogate a person of their responsibility to work in accordance with statutory requirements, codes of practice, standards, guidelines, safety data sheets, work instructions or industry best practice.

The assessment of atypical safety hazards arising from this advice is restricted to the environmental components set out in this report and based on known project conditions and stated design advice and assumptions. While some recommendations for safe controls may be provided, detailed 'safety in design' assessment is outside the current scope of this report and requires additional project data and assessment.

**Appendix A**

About this Report

Site Plan

# About this Report

November 2023

## Introduction

These notes have been provided to amplify DP's report in regard to classification methods, field procedures and the comments section. Not all are necessarily relevant to all reports.

DP's reports are based on information gained from limited subsurface excavations and sampling, supplemented by knowledge of local geology and experience. For this reason, they must be regarded as interpretive rather than factual documents, limited to some extent by the scope of information on which they rely.

## Copyright



## Borehole and Test Pit Logs

The borehole and test pit logs presented in this report are an engineering and/or geological interpretation of the subsurface conditions, and their reliability will depend to some extent on frequency of sampling and the method of drilling or excavation. Ideally, continuous undisturbed sampling or core drilling will provide the most reliable assessment, but this is not always practicable or possible to justify on economic grounds. In any case the boreholes and test pits represent only a very small sample of the total subsurface profile.

Interpretation of the information and its application to design and construction should therefore take into account the spacing of boreholes or pits, the frequency of sampling, and the possibility of other than 'straight line' variations between the test locations.

## Groundwater

Where groundwater levels are measured in boreholes there are several potential problems, namely:

- In low permeability soils groundwater may enter the hole very slowly or perhaps not at all during the time the hole is left open;
- A localised, perched water table may lead to an erroneous indication of the true water table;
- Water table levels will vary from time to time with seasons or recent weather changes. They may not be the same at the time of construction as are indicated in the report; and
- The use of water or mud as a drilling fluid will mask any groundwater inflow. Water has to be blown out of the hole and drilling mud must first be washed out of the hole if water measurements are to be made.

More reliable measurements can be made by installing standpipes which are read at intervals over several days, or perhaps weeks for low permeability soils. Piezometers, sealed in a particular stratum, may be advisable in low permeability soils or where there may be interference from a perched water table.

## Reports

The report has been prepared by qualified personnel, is based on the information obtained from field and laboratory testing, and has been undertaken to current engineering standards of interpretation and analysis. Where the report has been prepared for a specific design proposal, the information and interpretation may not be relevant if the design proposal is changed. If this happens, DP will be pleased to review the report and the sufficiency of the investigation work.

Every care is taken with the report as it relates to interpretation of subsurface conditions, discussion of geotechnical and environmental aspects, and recommendations or suggestions for design and construction. However, DP cannot always anticipate or assume responsibility for:

- Unexpected variations in ground conditions. The potential for this will depend partly on borehole or pit spacing and sampling frequency;
- Changes in policy or interpretations of policy by statutory authorities; or
- The actions of contractors responding to commercial pressures.

If these occur, DP will be pleased to assist with investigations or advice to resolve the matter.

continued next page

# About this Report

**Site Anomalies**

In the event that conditions encountered on site during construction appear to vary from those which were expected from the information contained in the report, DP requests that it be immediately notified. Most problems are much more readily resolved when conditions are exposed rather than at some later stage, well after the event.

**Information for Contractual Purposes**

Where information obtained from this report is provided for tendering purposes, it is recommended that all information, including the written report and discussion, be made available. In circumstances where the discussion or comments section is not relevant to the contractual situation, it may be appropriate to prepare a specially edited document. DP would be pleased to assist in this regard and/or to make additional report copies available for contract purposes at a nominal charge.

**Site Inspection**

The company will always be pleased to provide engineering inspection services for geotechnical and environmental aspects of work to which this report is related. This could range from a site visit to confirm that conditions exposed are as expected, to full time engineering presence on site.

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| | | | |
|---|---|---|---|
| Douglas PARTNERS GROUNDED EXPERTISE | CLIENT: DPIE | TITLE: **Site Plan** | PROJECT No: 228674.00 |
| | OFFICE: Sydney / DRAWN BY: TK | **17 Denison Street** | DRAWING No: 1 |
| | SCALE: Not to scale / DATE: 25.06.2024 | **Gloucester NSW** | REVISION: A |

## Appendix B

HAZMAT Register and Plates

**DP Project No: 228674.00**
**HAZMAT Survey**
**17 Denison Street, Gloucester NSW**

**RESULTS - ASBESTOS**

| | | | | | | Asbestos Risk Assessment | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Building Section** | **Room / Area** | **Material Location** | **Material Type** | **Sample No.** | **Material Status** | **Friability** | **Condition** | **Treatment** | **Accessibility** | **Activity** | **Ventilation** | **Risk Score** | **Action Priority** | **Photo No.** | **Summary Comment/Recommendation** |
| Eastern building | main retail area | eastern office cubicle, dividing wall, exterior side | fibre cement sheeting | A01 | no asbestos detected by analysis | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 1 | No asbestos identified. |
| Eastern building | main retail area | eastern office cubicle, dividing wall, interior side | fibre cement sheeting | refer A01 | suspected non-asbestos | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 2 | Suspected non-asbestos.<br>Consider conducting confirmatory sampling and analysis for asbestos prior to disturbance. |
| Eastern building | main retail area | eastern office cubicle, floor | "Flortex" carpet with fibrous backing | A06 | no asbestos detected by analysis | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | No asbestos identified. |
| Eastern building | northwestern garage | eastern wall, upper section (to ceiling void) | fibre cement sheeting | A02 | no asbestos detected by analysis | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 3 | No asbestos identified. |
| Eastern building | northwestern garage | eastern wall, portion of lower lining | fibre cement sheeting | A03 | no asbestos detected by analysis | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 4 | No asbestos identified. |
| Eastern building | northwestern garage | northern wall, strip lining above roller door | fibre cement sheeting | A04 | no asbestos detected by analysis (**SMF detected**) | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 5 | No asbestos identified. |
| Eastern building | northwestern garage | northern wall, uppermost wall linings | suspected fibre cement sheeting | N/A | **suspected asbestos** | 1 | 1 | 2 | 1 | 2 | 1 | 8 | Low | 6 | Inaccessible area/material - asbestos suspected to be present as a precaution. Confirm status of asbestos material(s) when safe access available and prior to any disturbance. |
| Eastern building | northwestern garage | western wall, infill above brick column | suspected fibre cement sheeting | N/A | **suspected asbestos** | 1 | 1 | 2 | 1 | 2 | 1 | 8 | Low | 7 | Inaccessible area/material - asbestos suspected to be present as a precaution. Confirm status of asbestos material(s) when safe access available and prior to any disturbance. |

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**DP Project No: 228674.00**
**HAZMAT Survey**
**17 Denison Street, Gloucester NSW**

**RESULTS - ASBESTOS**

| | | | | | | Asbestos Risk Assessment | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Building Section** | **Room / Area** | **Material Location** | **Material Type** | **Sample No.** | **Material Status** | **Friability** | **Condition** | **Treatment** | **Accessibility** | **Activity** | **Ventilation** | **Risk Score** | **Action Priority** | **Photo No.** | **Summary Comment/Recommendation** |
| Eastern building | northwestern garage | southern end, strip lining adjoining south side of timber rafter | fibre cement sheeting | A05 | no asbestos detected by analysis | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 8 | No asbestos identified. |
| Eastern building | electrical room | main electrical panel | resinous board | N/A | **suspected asbestos** | 0 | 1 | 2 | 2 | 2 | 1 | 8 | Low | 9 | Inaccessible area/material - asbestos suspected to be present as a precaution. Confirm status of asbestos material(s) when safe access available and prior to any disturbance. |
| Eastern building | electrical room | main electrical panel | ceramic fuses generally, internal insulation | N/A | **suspected asbestos** | 3 | 1 | 1 | 1 | 2 | 1 | 9 | Low | 10 | Inaccessible area/material - asbestos suspected to be present as a precaution. Confirm status of asbestos material(s) when safe access available and prior to any disturbance. |
| Eastern building | electrical room | wall at rear of main electrical panel | fibre cement sheeting | N/A | **suspected asbestos** | 1 | 1 | 3 | 1 | 2 | 1 | 9 | Low | 11 | Inaccessible area/material - asbestos suspected to be present as a precaution. Confirm status of asbestos material(s) when safe access available and prior to any disturbance. |
| Eastern building | main retail area | eastern toilets, wall linings generally | fibre cement sheeting | A07 | **asbestos detected by analysis** | 1 | 1 | 2 | 2 | 2 | 1 | 9 | Low | 12 | Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Eastern building | main retail area | eastern toilets, ceiling | fibre cement sheeting | A08 | **asbestos detected by analysis** | 1 | 2 | 2 | 1 | 2 | 1 | 9 | Low | 13 | Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Eastern building | main retail area | eastern toilets, floor | fibre cement fragment(s) | refer A08 | **suspected asbestos** | 1 | 3 | 2 | 3 | 2 | 1 | 12 | Moderate | 14 | Restrict access to reduce the risk of exposure.<br><br>Remove asbestos material as soon as practicable, prior to any disturbance, and prior to general demolition work proceeding. Removal should be undertaken by a licensed asbestos removalist. |

**DP Project No: 228674.00**
**HAZMAT Survey**
**17 Denison Street, Gloucester NSW**

**RESULTS - ASBESTOS**

| | | | | | | Asbestos Risk Assessment | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Building Section** | **Room / Area** | **Material Location** | **Material Type** | **Sample No.** | **Material Status** | **Friability** | **Condition** | **Treatment** | **Accessibility** | **Activity** | **Ventilation** | **Risk Score** | **Action Priority** | **Photo No.** | **Summary Comment/Recommendation** |
| Eastern building | tool store | underside of roof | bituminous lining | A09 | no asbestos detected by analysis | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 15 | No asbestos identified. |
| Eastern building | main warehouse area | eastern wall, window infill | fibre cement sheeting | A10 | **asbestos detected by analysis** | 1 | 1 | 2 | 2 | 2 | 1 | 9 | Low | 16 | Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Eastern building | main warehouse area | eastern wall, timber framework | fibre cement fragment(s) | A18 | **asbestos detected by analysis** | 1 | 1 | 2 | 2 | 2 | 1 | 9 | Low | 17 | Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Eastern building | main warehouse area | eastern wall, framed section(s) | fibre cement sheeting | A11 | **asbestos detected by analysis** | 1 | 1 | 2 | 2 | 2 | 1 | 9 | Low | 18 | Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Eastern building | main warehouse area | western wall linings generally | fibre cement sheeting | A12 | no asbestos detected by analysis | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 19 | No asbestos identified. |

**DP Project No: 228674.00**
**HAZMAT Survey**
**17 Denison Street, Gloucester NSW**

**RESULTS - ASBESTOS**

| | | | | | | Asbestos Risk Assessment | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Building Section** | **Room / Area** | **Material Location** | **Material Type** | **Sample No.** | **Material Status** | **Friability** | **Condition** | **Treatment** | **Accessibility** | **Activity** | **Ventilation** | **Risk Score** | **Action Priority** | **Photo No.** | **Summary Comment/Recommendation** |
| Eastern building | main warehouse area | northeastern toilets, wall linings generally | fibre cement sheeting | refer A07 | **suspected asbestos** | 1 | 1 | 2 | 2 | 2 | 1 | 9 | Low | 20 | Consider conducting further confirmatory sampling and analysis for asbestos prior to any disturbance.<br><br>Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Eastern building | main warehouse area | northeastern toilets, ceiling lining | fibre cement sheeting | refer A08 | **suspected asbestos** | 1 | 2 | 2 | 1 | 2 | 1 | 9 | Low | 21 | Consider conducting further confirmatory sampling and analysis for asbestos prior to any disturbance.<br><br>Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Eastern building | main warehouse area | northeastern toilets | cement cistern | A19 | no asbestos detected by analysis | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | No asbestos identified. |
| Eastern building | main warehouse area | several pits in floor | materials in general | N/A | inaccessible (confined space, liquids etc.) | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 45 | Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance. |
| Eastern building | rooms and areas in general | subfloor | materials in general | N/A | inaccessible (crawl space) | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 46 | Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance. |

**DP Project No: 228674.00**
**HAZMAT Survey**
**17 Denison Street, Gloucester NSW**

**RESULTS - ASBESTOS**

| | | | | | | Asbestos Risk Assessment | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Building Section** | **Room / Area** | **Material Location** | **Material Type** | **Sample No.** | **Material Status** | **Friability** | **Condition** | **Treatment** | **Accessibility** | **Activity** | **Ventilation** | **Risk Score** | **Action Priority** | **Photo No.** | **Summary Comment/Recommendation** |
| Eastern building | exterior | northern façade, awning fascia | possible fibre cement sheeting | N/A | suspected non-asbestos | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 22 | Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance. |
| Eastern building | exterior | eastern façade, electrical panel | backing board | N/A | suspected non-asbestos | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 43 | Inaccessible area/material (electrical hazard) - Confirm status of hazardous material(s) when safe access available and prior to any disturbance. |
| Southern building | interior, eastern side | electrical panel | backing board | N/A | suspected non-asbestos | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 44 | Inaccessible area/material (electrical hazard) - Confirm status of hazardous material(s) when safe access available and prior to any disturbance. |
| Western building (Dunlop Tyres) | entry vestibule | wall linings generally | fibre cement sheeting | A13 | **asbestos detected by analysis** | 1 | 2 | 2 | 3 | 2 | 1 | 11 | Moderate | 23 | Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Western building (Dunlop Tyres) | entry vestibule | ceiling | fibre cement sheeting | refer A13 | **suspected asbestos** | 1 | 1 | 1 | 1 | 2 | 1 | 7 | Low | 24 | Consider conducting further confirmatory sampling and analysis for asbestos prior to any disturbance.<br><br>Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Western building (Dunlop Tyres) | western garage and store room | wall linings generally | fibre cement sheeting | A14 | **asbestos detected by analysis** | 1 | 1 | 2 | 2 | 2 | 1 | 9 | Low | 25 | Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |

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**DP Project No: 228674.00**
**HAZMAT Survey**
**17 Denison Street, Gloucester NSW**

**RESULTS - ASBESTOS**

| | | | | | | Asbestos Risk Assessment | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Building Section** | **Room / Area** | **Material Location** | **Material Type** | **Sample No.** | **Material Status** | **Friability** | **Condition** | **Treatment** | **Accessibility** | **Activity** | **Ventilation** | **Risk Score** | **Action Priority** | **Photo No.** | **Summary Comment/Recommendation** |
| Western building (Dunlop Tyres) | western garage and store room | ceiling linings generally | fibre cement sheeting | similar A14 | **suspected asbestos** | 1 | 1 | 2 | 1 | 2 | 1 | 8 | Low | 26 | Consider conducting further confirmatory sampling and analysis for asbestos prior to any disturbance.<br><br>Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Western building (Dunlop Tyres) | northern façade | fascia | fibre cement sheeting | A15 | **asbestos detected by analysis** | 1 | 1 | 2 | 1 | 1 | 1 | 7 | Low | 27 | Remove asbestos material prior to any disturbance including during general occupation and building work (e.g., maintenance, renovation and demolition work). Removal should be undertaken by a licensed asbestos removalist. |
| Western building (Dunlop Tyres) | interior, southern side | wall lining(s) inc. to support ledge | fibre cement sheeting | A16 | no asbestos detected by analysis | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 28 | No asbestos identified. |
| Western building (Dunlop Tyres) | exterior, southern façade | wall, expansion gap | lining | A17 | no asbestos detected by analysis | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | 29 | No asbestos identified. |

**DP Project No: 228674.00**
**HAZMAT Survey**
**17 Denison Street, Gloucester NSW**

**RESULTS - LEAD PAINT SCREENING ASSESSMENT**

| | | | | Analysis / Test Results | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Building Level** | **Room / Area** | **Material Location** | **Material Type** | **Sample / Test No.** | **lead (% w/w)** | **Spot Test Result** | **Material Status** | **Photo No.** | **Summary Comment/Recommendation** |
| Eastern building | main retail area | masonry column at main entrance | pale blue paint | LP1 | **0.35** | N/A | **lead paint detected** | 30 | Lead paint identified. Analysis results are above the threshold concentration criteria for lead paint outlined in AS/NZS 4361.2 (i.e. >0.1 % lead w/w).<br><br>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity. Any areas of damaged/flaking paint and any associated dust/debris should be removed.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. . |
| Eastern building | main retail area | eastern end, office door | dark blue paint | ST2 | N/A | negative | lead paint not detected | N/A | Lead spot test result considered negative (no apparent colour change observed). Sampling and laboratory analysis of the paint should be considered to confirm the lead concentration (% w/w) prior to any disturbance. |
| Eastern building | northwestern garage | masonry column | white paint | LP2 | **0.24** | N/A | **lead paint detected** | 31 | Lead paint identified. Analysis results are above the threshold concentration criteria for lead paint outlined in AS/NZS 4361.2 (i.e. >0.1 % lead w/w).<br><br>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity. Any areas of damaged/flaking paint and any associated dust/debris should be removed.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. . |
| Eastern building | main warehouse areas, toilets | interior door frame | blue paint | LP3 | 0.064 | N/A | lead paint not detected | N/A | Analysis results non-detect and/or below the threshold concentration criteria for lead containing paint as outlined in AS/NZS 4361.2 (i.e., ≤0.1 % w/w).<br><br>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. |
| Eastern building | main warehouse areas, toilets | exterior door frame | grey paint | LP4 | 0.04 | N/A | lead paint not detected | N/A | Analysis results non-detect and/or below the threshold concentration criteria for lead containing paint as outlined in AS/NZS 4361.2 (i.e., ≤0.1 % w/w).<br><br>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. |
| Southern Building | centre of northern side | steel support | cream paint | LP5 | 0.095 | N/A | lead paint not detected | N/A | Analysis results non-detect and/or below the threshold concentration criteria for lead containing paint as outlined in AS/NZS 4361.2 (i.e., ≤0.1 % w/w).<br><br>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. |

**DP Project No: 228674.00**
**HAZMAT Survey**
**17 Denison Street, Gloucester NSW**

**RESULTS - LEAD PAINT SCREENING ASSESSMENT**

| | | | | Analysis / Test Results | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Building Level** | **Room / Area** | **Material Location** | **Material Type** | **Sample / Test No.** | **lead (% w/w)** | **Spot Test Result** | **Material Status** | **Photo No.** | **Summary Comment/Recommendation** |
| Southern Building | exterior | metal bollard | grey paint | LP6 | 0.072 | N/A | lead paint not detected | N/A | Analysis results non-detect and/or below the threshold concentration criteria for lead containing paint as outlined in AS/NZS 4361.2 (i.e., ≤0.1 % w/w).<br><br>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. |
| Southern Building | exterior | lower course of brick wall | paint | LP7 | <0.005 | N/A | lead paint not detected | N/A | Analysis results non-detect and/or below the threshold concentration criteria for lead containing paint as outlined in AS/NZS 4361.2 (i.e., ≤0.1 % w/w).<br><br>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. |
| Eastern building | exterior, eastern façade | window frame | grey paint | LP8 | **0.30** | N/A | **lead paint detected** | 32 | Lead paint identified. Analysis results are above the threshold concentration criteria for lead paint outlined in AS/NZS 4361.2 (i.e. >0.1 % lead w/w).<br><br>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity. Any areas of damaged/flaking paint and any associated dust/debris should be removed.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. . |
| Eastern building | exterior, eastern façade | door | white paint | LP9 | 0.097 | N/A | lead paint not detected | N/A | Analysis results non-detect and/or below the threshold concentration criteria for lead containing paint as outlined in AS/NZS 4361.2 (i.e., ≤0.1 % w/w).<br><br>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. |
| Western building (Dunlop Tyres) | southern façade | sliding door | cream and underlying blue paint | LP10 | **0.85** | N/A | **lead paint detected** | 33 | Lead paint identified. Analysis results are above the threshold concentration criteria for lead paint outlined in AS/NZS 4361.2 (i.e. >0.1 % lead w/w).<br><br>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity. Any areas of damaged/flaking paint and any associated dust/debris should be removed.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. . |
| Building in general | rooms and areas in general | surfaces in general | paints | refer LP1, LP2, LP8 and LP10 | N/A | N/A | **may comprise lead paints** | N/A | Lead paints detected in building. Conduct further sampling and analysis for lead, as required, prior to any work that may disturb lead containing paints.<br><br>Minimise disturbance and implement controls to prevent lead exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any paint disturbance activity.<br><br>Classify material for disposal when necessary in accordance with the NSW EPA Waste Classification Guidelines and segregate material for disposal if required. |

**DP Project No:** **228674.00**

**HAZMAT Survey**

**17 Denison Street, Gloucester NSW**

**RESULTS - LEAD IN CEILING CAVITY DUST**

| Building Level | Room / Area | Material Location | Material Type | Sample No. | Material Status | Photo No. | Summary Comment/Recommendation |
|---|---|---|---|---|---|---|---|
| Eastern building | tool store, eastern end | ceiling cavity | settled dust / debris | LD1 | **lead detected (160 mg/m²)** | 34 | Elevated lead concentration detected.<br><br>Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.<br><br>Remove lead contamination if reasonably practicable to do so and prior to any substantive disturbance.<br><br>Implement appropriate controls to prevent exposure and dispersal including during building work (e.g. maintenance, refurbishment and demolition). |
| Eastern building | tool store, eastern end | ceiling cavity | settled dust / debris | LD2 | **lead detected (280 mg/m²)** | 34 | Elevated lead concentration detected.<br><br>Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.<br><br>Remove lead contamination if reasonably practicable to do so and prior to any substantive disturbance.<br><br>Implement appropriate controls to prevent exposure and dispersal including during building work (e.g. maintenance, refurbishment and demolition). |
| Buildings in general | rooms and areas in general | ceiling cavities | settled dust / debris | refer LD1 and LD2 | **elevated lead concentration suspected** | N/A | Elevated lead concentration suspected.<br><br>Undertake confirmatory sampling and analysis for lead if required prior to disturbance.<br><br>Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.<br><br>Remove lead contamination if reasonably practicable to do so and prior to any substantive disturbance.<br><br>Implement appropriate controls to prevent exposure and dispersal including during building work (e.g. maintenance, refurbishment and demolition). |

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**HAZMAT Survey**

**17 Denison Street, Gloucester NSW**

**RESULTS - SYNTHETIC MINERAL FIBRE (SMF)**

| Building | Room / Area | Material Location | Material Type | Sample No. | Material Status | Photo No. | Summary Comment/Recommendation |
|---|---|---|---|---|---|---|---|
| Eastern building | northwestern garage | northern wall, strip ling above roller door | fibre cement sheeting | A04 | no asbestos detected by analysis (**SMF detected**) | N/A | SMF identified. Classify material for disposal in accordance with the NSW EPA Waste Classification Guidelines and segregate material, if required, for disposal. Minimise disturbance and implement controls to prevent exposure and dispersal during any SMF abatement activity and any building work (e.g. maintenance, refurbishment and demolition). |

**DP Project No: 228674.00**

**HAZMAT Survey**

**17 Denison Street, Gloucester NSW**

**RESULTS - POLYCHLORINATED BIPHENYLS (PCBs)**

| Building Level | Room / Area | Material Location | Material Type | Sample No. | Material Status | Photo No. | Summary Comment/Recommendation |
|---|---|---|---|---|---|---|---|
| Eastern building | main retail area | fluorescent light fitting | National Industrial Lagging Ballast, Cat. NAB/410, 230/240V, 50 Cycle AC | N/A | **PCB (suspected)** | 35 | Component(s) not clearly identified in ANZECC (1997) and therefore suspected to contain PCB as a precaution. Conduct sampling and analysis for PCB when safe access is available, and prior to any disturbance. Remove and dispose any confirmed and/or suspected PCB-containing components (e.g. metal capacitors and ballasts etc.) prior to disturbance (e.g. renovation, demolition or maintenance work). |
| Eastern building | service counter area | fluorescent light fitting | National Industrial Lagging Ballast, Cat. NAB/410, 230/240V, 50 Cycle AC | N/A | **PCB (suspected)** | 36 | Component(s) not clearly identified in ANZECC (1997) and therefore suspected to contain PCB as a precaution. Conduct sampling and analysis for PCB when safe access is available, and prior to any disturbance. Remove and dispose any confirmed and/or suspected PCB-containing components (e.g. metal capacitors and ballasts etc.) prior to disturbance (e.g. renovation, demolition or maintenance work). |
| Eastern building | tool store | fluorescent light fitting | Ferguson CF280-A, 40 Watt Ballast, 240V, 50 CPS<br><br>UCC Capacitor, Type PBB, 2.7 MFD, 250V AC, 50 CPS | N/A | **PCB (suspected)** | 37 | Component(s) not clearly identified in ANZECC (1997) and therefore suspected to contain PCB as a precaution. Conduct sampling and analysis for PCB when safe access is available, and prior to any disturbance. Remove and dispose any confirmed and/or suspected PCB-containing components (e.g. metal capacitors and ballasts etc.) prior to disturbance (e.g. renovation, demolition or maintenance work). |

**DP Project No: 228674.00**

**HAZMAT Survey**

**17 Denison Street, Gloucester NSW**

**RESULTS - POLYCHLORINATED BIPHENYLS (PCBs)**

| Building Level | Room / Area | Material Location | Material Type | Sample No. | Material Status | Photo No. | Summary Comment/Recommendation |
|---|---|---|---|---|---|---|---|
| Eastern building | main warehouse area, northern wall | fluorescent light fitting | Ferguson CF280-A, 40 Watt Ballast, 240V, 50 CPS<br><br>UCC Fluropack Capacitor, Type PBB 116, 2.7 MFD, 250V AC, 50 CPS | N/A | **PCB identified** | 38 | Component(s) identified in ANZECC (1997) as containing PCB.<br><br>Remove and dispose any PCB-containing components (e.g. metal capacitors and ballasts etc.) prior to disturbance (e.g. renovation, demolition or maintenance work). |
| Eastern building | main warehouse area | fluorescent light fitting | MSP Low Loss Ballast, LLS165PW, Class H, 250V : 50 Hz, 73230-050, AS C322/168, N/433 | N/A | **PCB (suspected)** | 39 | Component(s) not clearly identified in ANZECC (1997) and therefore suspected to contain PCB as a precaution. Conduct sampling and analysis for PCB when safe access is available, and prior to any disturbance. Remove and dispose any confirmed and/or suspected PCB-containing components (e.g. metal capacitors and ballasts etc.) prior to disturbance (e.g. renovation, demolition or maintenance work). |
| Western building | western garage, store room | fluorescent light fitting | Ferguson ballast, F140 TP, AS No. C168 C322, App No. N/158, 240V 50 Hz, Class E | N/A | **PCB (suspected)** | 40 | Component(s) not clearly identified in ANZECC (1997) and therefore suspected to contain PCB as a precaution. Conduct sampling and analysis for PCB when safe access is available, and prior to any disturbance. Remove and dispose any confirmed and/or suspected PCB-containing components (e.g. metal capacitors and ballasts etc.) prior to disturbance (e.g. renovation, demolition or maintenance work). |

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**DP Project No: 228674.00**

**HAZMAT Survey**

**17 Denison Street, Gloucester NSW**

**RESULTS - POLYCHLORINATED BIPHENYLS (PCBs)**

| Building Level | Room / Area | Material Location | Material Type | Sample No. | Material Status | Photo No. | Summary Comment/Recommendation |
|---|---|---|---|---|---|---|---|
| Building in general | rooms and areas in general | fluorescent light fittings generally | internal components (e.g., capacitors, ballasts) | N/A | **PCB (suspected)** | 42, 43 | Confirm status of hazardous material(s) when safe access available and prior to any disturbance. |


Photograph 1: Eastern building, main retail area, eastern office cubicle, dividing wall, exterior side, fibre cement sheeting, no asbestos detected by analysis.

Photograph 2: Eastern building, main retail area, eastern office cubicle, dividing wall, interior side, fibre cement sheeting, suspected non-asbestos.

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| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 1<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |


Photograph 3: Eastern building, northwestern garage, eastern wall, upper section (to ceiling void), fibre cement sheeting, no asbestos detected by analysis.

Photograph 4: Eastern building, northwestern garage, eastern wall, portion of lower lining, fibre cement sheeting, no asbestos detected by analysis.

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| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs** | PROJECT: 228674.00 |
| | **HAZMAT Survey** | PLATE No: 2 |
| | **17 Denison Street, Gloucester** | REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 5: Eastern building, northwestern garage, northern wall, strip ling above roller door, fibre cement sheeting, no asbestos detected by analysis (SMF detected).

Photograph 6: Eastern building, northwestern garage, northern wall, uppermost wall linings, suspected fibre cement sheeting, suspected asbestos.

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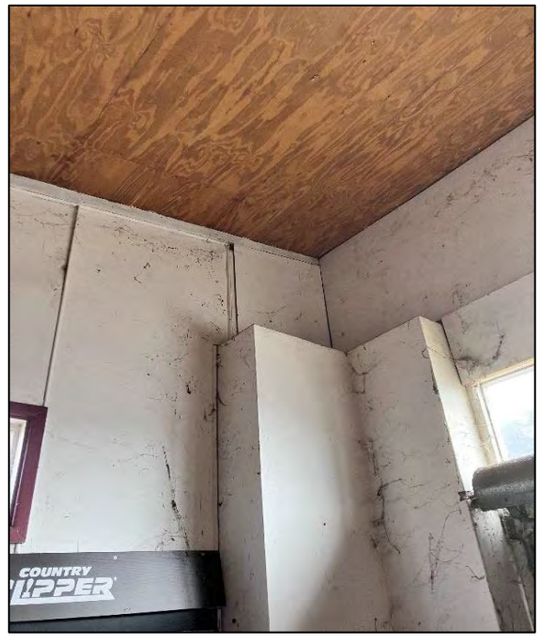
| Douglas PARTNERS \| CROUNDED EXPERTISE | **Site Photographs** | PROJECT: 228674.00 |
| | **HAZMAT Survey** | PLATE No: 3 |
| | **17 Denison Street, Gloucester** | REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |




Photograph 7: Eastern building, northwestern garage, western wall, infill above brick column, suspected fibre cement sheeting, suspected asbestos.

Photograph 8: Eastern building, northwestern garage, southern end, strip lining adjoining south side of timber rafter, fibre cement sheeting, no asbestos detected by analysis.

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| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 9: Eastern building, electrical room, main electrical panel, resinous board, suspected asbestos.


Photograph 10: Eastern building, electrical room, main electrical panel, ceramic fuses generally, internal insulation, suspected asbestos.

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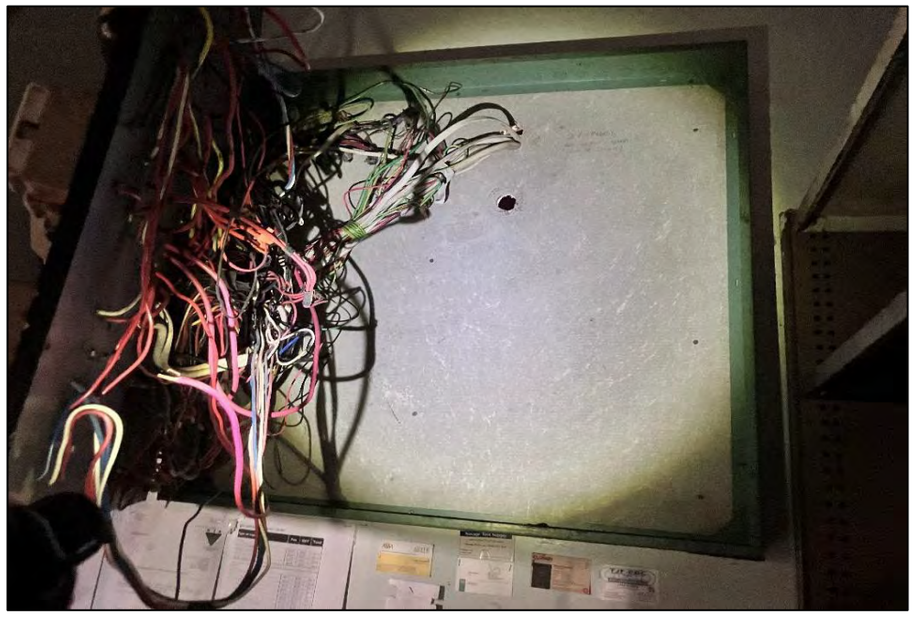
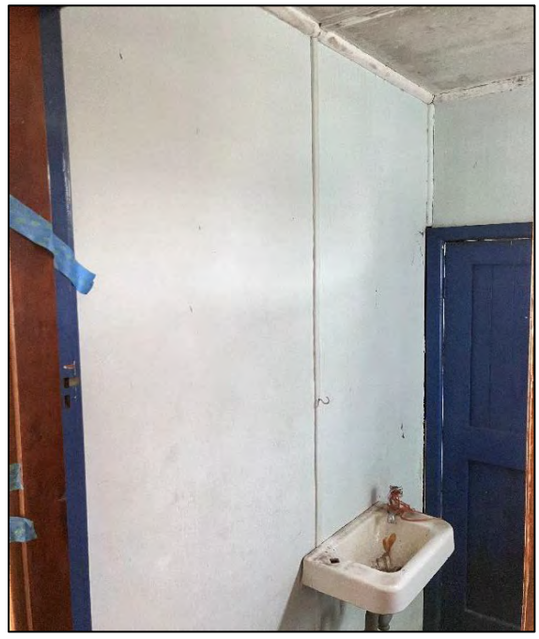
| Douglas PARTNERS \| CROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 5<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |



Photograph 11: Eastern building, electrical room, wall at rear of main electrical panel, fibre cement sheeting, suspected asbestos.



Photograph 12: Eastern building, main retail area, eastern toilets, wall linings generally, fibre cement sheeting, asbestos detected by analysis.

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| Douglas PARTNERS \| CROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 6<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 13: Eastern building, main retail area, eastern toilets, ceiling, fibre cement sheeting, asbestos detected by analysis.

Photograph 14: Eastern building, main retail area, eastern toilets, floor, fibre cement fragment(s), suspected asbestos.

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| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 7<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 15: Eastern building, tool store, underside of roof, bituminous lining, no asbestos detected by analysis.

Photograph 16: Eastern building, main warehouse area, eastern wall, window infill, fibre cement sheeting, asbestos detected by analysis.

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| Douglas Partners — Grounded Expertise | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 8<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 17: Eastern building, main warehouse area, eastern wall, timber framework, fibre cement fragment(s), asbestos detected by analysis.

Photograph 18: Eastern building, main warehouse area, eastern wall, framed section(s), fibre cement sheeting, asbestos detected by analysis.

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| Douglas PARTNERS \| CROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 9<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 19: Eastern building, main warehouse area, western wall linings generally, fibre cement sheeting, no asbestos detected by analysis.

Photograph 20: Eastern building, main warehouse area, northeastern toilets, wall linings generally, fibre cement sheeting, suspected asbestos.

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| Douglas PARTNERS \| CROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 10<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 21: Eastern building, main warehouse area, northeastern toilets, ceiling lining, fibre cement sheeting, suspected asbestos.

Photograph 22: Eastern building, exterior, northern façade, awning fascia, possible fibre cement sheeting, suspected non-asbestos.

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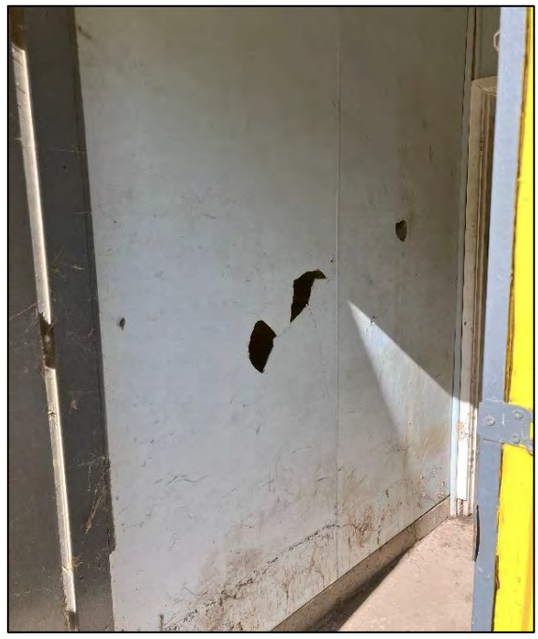
| Douglas PARTNERS \| CROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 11<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |



Photograph 23: Western building (Dunlop Tyres), entry vestibule, wall linings generally, fibre cement sheeting, asbestos detected by analysis.

Photograph 24: Western building (Dunlop Tyres), entry vestibule, ceiling, fibre cement sheeting, suspected asbestos.

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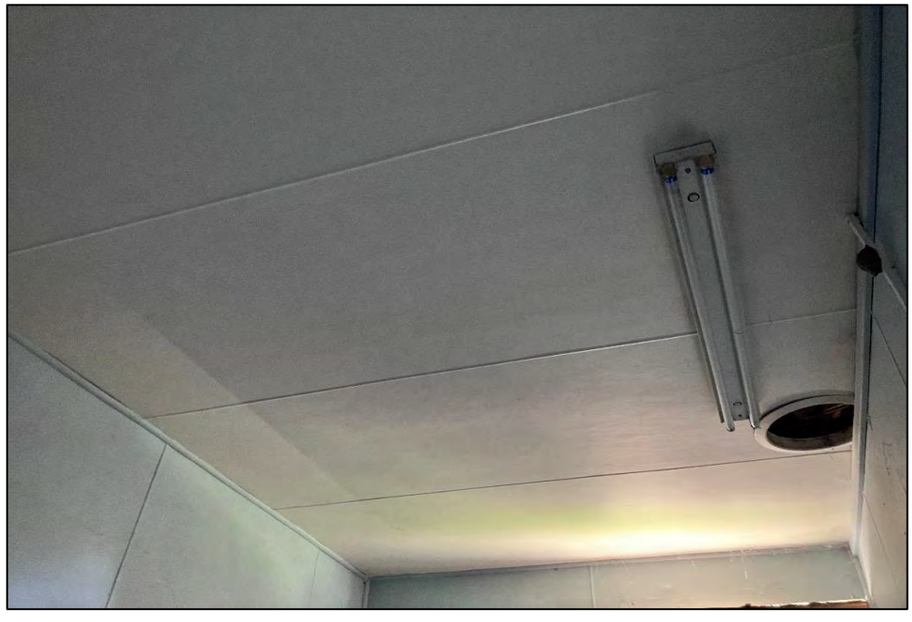
| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 12<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 25: Western building (Dunlop Tyres), western garage and store room, wall linings generally, fibre cement sheeting, asbestos detected by analysis.



Photograph 26: Western building (Dunlop Tyres), western garage and store room, ceiling linings generally, fibre cement sheeting, suspected asbestos.

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| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 13<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 27: Western building (Dunlop Tyres), northern façade, fascia, fibre cement sheeting, asbestos detected by analysis.

Photograph 28: Western building (Dunlop Tyres), interior, southern side, wall lining(s) inc. to support ledge, fibre cement sheeting, no asbestos detected by analysis.

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| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 14<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 29: Western building (Dunlop Tyres), exterior, southern façade, wall, expansion gap, lining, no asbestos detected by analysis.


Photograph 30: Eastern building, main retail area, concrete column at main entrance, pale blue paint, lead paint detected.

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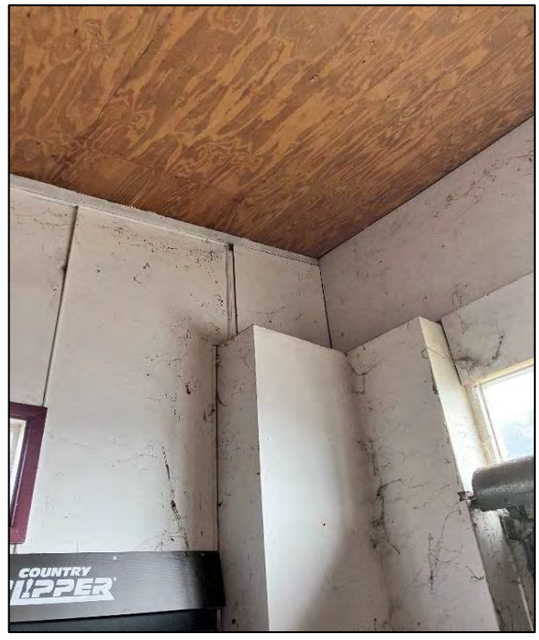
| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 15<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |




Photograph 31: Eastern building, northwestern garage, masonry column, white paint, lead paint detected.

Photograph 32: Eastern building, exterior, eastern façade, window frame, grey paint, lead paint detected.

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| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 16<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |


Photograph 33: Western building (Dunlop Tyres), southern façade, sliding door, cream and underlying blue paint, lead paint detected.

Photograph 34: Eastern building, tool store, eastern end, ceiling cavity, settled dust / debris, lead detected.

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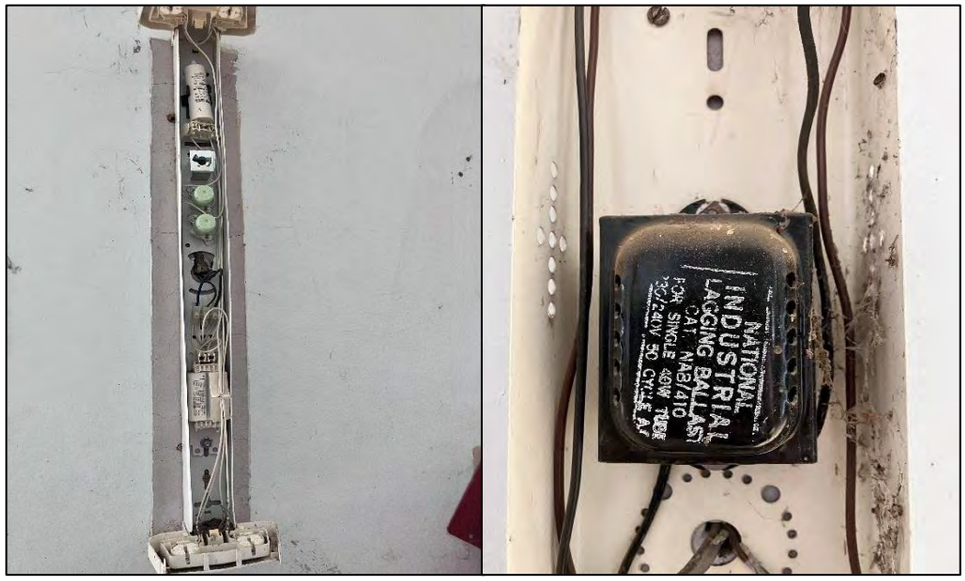
| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 17<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |




Photograph 35: Eastern building, main retail area, wall(s), fluorescent light fittings generally, internal components (e.g., capacitors, ballasts), PCB (suspected).


Photograph 36: Eastern building, service counter and tool store, fluorescent light fitting(s), internal components (e.g., capacitors, ballasts), PCB (suspected).

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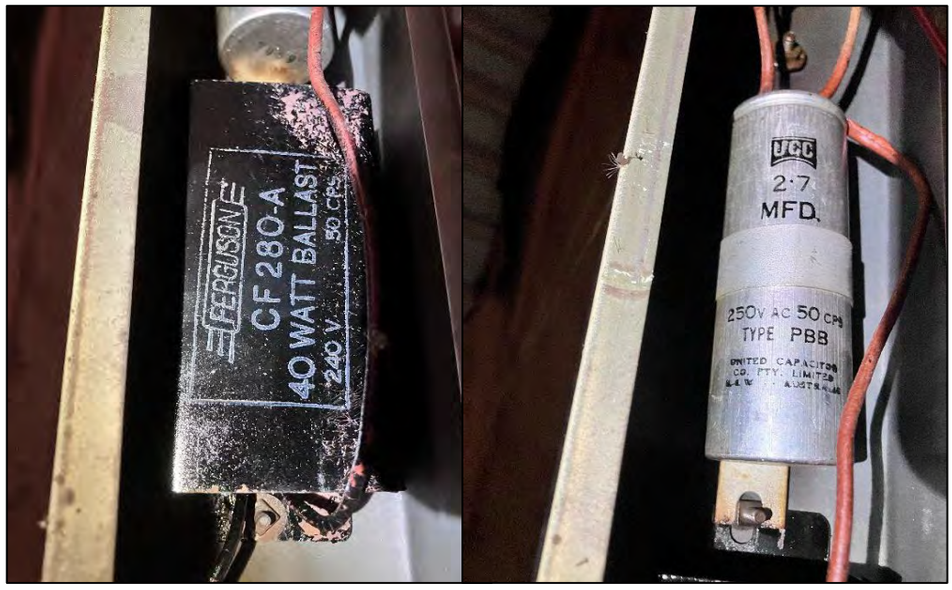
| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs** | PROJECT: 228674.00 |
| | **HAZMAT Survey** | PLATE No: 18 |
| | **17 Denison Street, Gloucester** | REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |




Photograph 37: Eastern building, tool store, fluorescent light fitting(s), internal components (e.g., capacitors, ballasts), PCB (suspected).


Photograph 38: Eastern building, main warehouse area, northern wall, fluorescent light fittings generally, internal components (e.g., capacitors, ballasts), PCB (suspected).

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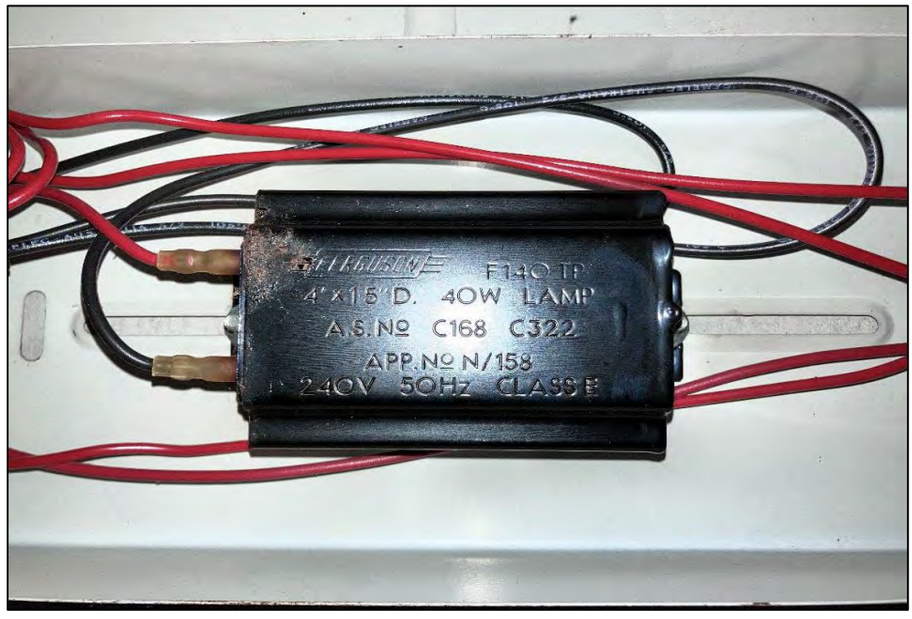
| Douglas PARTNERS \| CROUNDED EXPERTISE | **Site Photographs** | PROJECT: 228674.00 |
| | **HAZMAT Survey** | PLATE No: 19 |
| | **17 Denison Street, Gloucester** | REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |


Photograph 39: Eastern building, main warehouse area, suspended fluorescent light fittings generally, internal components (e.g., capacitors, ballasts), PCB (suspected).




Photograph 40: Western building, western garage and store room, fluorescent light fittings generally, internal components (e.g., capacitors, ballasts), .

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| Douglas PARTNERS \| GROUNDED EXPERTISE | **Site Photographs** | PROJECT: 228674.00 |
| | **HAZMAT Survey** | PLATE No: 20 |
| | **17 Denison Street, Gloucester** | REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 41: Building in general, rooms and areas in general, fluorescent light fittings generally, internal components (e.g., capacitors, ballasts), PCB (suspected).

Photograph 42 Building in general, rooms and areas in general, fluorescent light fittings generally, internal components (e.g., capacitors, ballasts), PCB (suspected).

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| Douglas PARTNERS \| CROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 21<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 43: Eastern building, exterior, eastern façade, electrical panel, backing board, suspected non-asbestos.


Photograph 44: Southern building, interior, eastern side, electrical panel, backing board, suspected non-asbestos.

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| Douglas PARTNERS \| CROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 22<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

Photograph 45: Eastern building, main warehouse area, several pits in floor, materials in general, inaccessible (confined space, liquids etc.).

Photograph 46: Eastern building, rooms and areas in general, subfloor, materials in general, inaccessible (crawl space).

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| Douglas PARTNERS \| CROUNDED EXPERTISE | **Site Photographs**<br>**HAZMAT Survey**<br>**17 Denison Street, Gloucester** | PROJECT: 228674.00<br>PLATE No: 23<br>REV: A |
| | CLIENT: DPHI | DATE: Jun-24 |

## Appendix C

Laboratory Certificate(s) of Analysis

**Envirolab Services Pty Ltd**
ABN 37 112 535 645
12 Ashley St Chatswood NSW 2067
ph 02 9910 6200 fax 02 9910 6201
customerservice@envirolab.com.au
www.envirolab.com.au

# CERTIFICATE OF ANALYSIS 353578

## Client Details

| | |
|---|---|
| **Client** | Douglas Partners Pty Ltd |
| **Attention** | Tim Kulmar |
| **Address** | 96 Hermitage Rd, West Ryde, NSW, 2114 |

## Sample Details

| | |
|---|---|
| **Your Reference** | **228674.00 - Gloucester** |
| **Number of Samples** | 19 Material, 10 Paint, 2 Swab |
| **Date samples received** | 11/06/2024 |
| **Date completed instructions received** | 11/06/2024 |

## Analysis Details

Please refer to the following pages for results, methodology summary and quality control data.

Samples were analysed as received from the client. Results relate specifically to the samples as received.

Results are reported on a dry weight basis for solids and on an as received basis for other matrices.

## Report Details

| | |
|---|---|
| **Date results requested by** | 18/06/2024 |
| **Date of Issue** | 18/06/2024 |

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**Asbestos Approved By**
Analysed by Asbestos Approved Analyst: Lucy Zhu
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**Results Approved By**
Loren Bardwell, Development Chemist
Lucy Zhu, Asbestos Supervisor
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**Authorised By**
Nancy Zhang, Laboratory Manager

| Asbestos ID - materials | | | | | | |
|---|---|---|---|---|---|---|
| Our Reference | | 353578-1 | 353578-2 | 353578-3 | 353578-4 | 353578-5 |
| Your Reference | UNITS | A01 | A02 | A03 | A04 | A05 |
| Date Sampled | | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 |
| Type of sample | | Material | Material | Material | Material | Material |
| Date analysed | - | 18/06/2024 | 18/06/2024 | 18/06/2024 | 18/06/2024 | 18/06/2024 |
| Mass / Dimension of Sample | - | 35x20x5mm | 25x15x5mm | 20x15x2mm | 81x50x2mm | 35x10x4mm |
| Sample Description | - | Beige fibre cement material | Beige fibre cement material | Beige fibre cement material | Brown vitreous fibrous sheet | Beige fibre cement material |
| Asbestos ID in materials | - | No asbestos detected<br>Organic fibres detected | No asbestos detected<br>Organic fibres detected | No asbestos detected<br>Organic fibres detected | No asbestos detected<br>Organic fibres detected<br>Synthetic mineral fibres detected | No asbestos detected<br>Organic fibres detected |
| Trace Analysis | - | No asbestos detected | No asbestos detected | No asbestos detected | No asbestos detected | No asbestos detected |

| Asbestos ID - materials | | | | | | |
|---|---|---|---|---|---|---|
| Our Reference | | 353578-6 | 353578-7 | 353578-8 | 353578-9 | 353578-10 |
| Your Reference | UNITS | A06 | A07 | A08 | A09 | A10 |
| Date Sampled | | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 |
| Type of sample | | Material | Material | Material | Material | Material |
| Date analysed | - | 18/06/2024 | 18/06/2024 | 18/06/2024 | 18/06/2024 | 18/06/2024 |
| Mass / Dimension of Sample | - | 25x12x3mm | 20x15x2mm | 40x25x5mm | 65x42x2mm | 15x10x1mm |
| Sample Description | - | Beige fibre cement material | Grey fibre cement material | Grey fibre cement material | Black & Brown fibrous sheet | Beige fibre cement material |
| Asbestos ID in materials | - | No asbestos detected<br>Organic fibres detected | Chrysotile asbestos detected<br>Amosite asbestos detected<br>Crocidolite asbestos detected | Chrysotile asbestos detected<br>Amosite asbestos detected<br>Crocidolite asbestos detected | No asbestos detected<br>Organic fibres detected | Chrysotile asbestos detected<br>Organic fibres detected |
| Trace Analysis | - | No asbestos detected | [NT] | [NT] | No asbestos detected | [NT] |

| Asbestos ID - materials | | | | | | |
|---|---|---|---|---|---|---|
| Our Reference | | 353578-11 | 353578-12 | 353578-13 | 353578-14 | 353578-15 |
| Your Reference | UNITS | A11 | A12 | A13 | A14 | A15 |
| Date Sampled | | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 |
| Type of sample | | Material | Material | Material | Material | Material |
| Date analysed | - | 18/06/2024 | 18/06/2024 | 18/06/2024 | 18/06/2024 | 18/06/2024 |
| Mass / Dimension of Sample | - | 20x10x1mm | 50x35x5mm | 40x25x5mm | 40x30x5mm | 35x20x5mm |
| Sample Description | - | Grey fibre cement material | Beige fibre cement material | Beige fibre cement material | Beige fibre cement material | Beige fibre cement material |
| Asbestos ID in materials | - | Chrysotile asbestos detected<br>Amosite asbestos detected | No asbestos detected<br>Organic fibres detected | Chrysotile asbestos detected<br>Organic fibres detected | Chrysotile asbestos detected<br>Organic fibres detected | Chrysotile asbestos detected<br>Organic fibres detected |
| Trace Analysis | - | [NT] | No asbestos detected | [NT] | [NT] | [NT] |

| Asbestos ID - materials | | | | | |
|---|---|---|---|---|---|
| Our Reference | | 353578-16 | 353578-17 | 353578-18 | 353578-19 |
| Your Reference | UNITS | A16 | A17 | A18 | A19 |
| Date Sampled | | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 |
| Type of sample | | Material | Material | Material | Material |
| Date analysed | - | 18/06/2024 | 18/06/2024 | 18/06/2024 | 18/06/2024 |
| Mass / Dimension of Sample | - | 60x45x5mm | 70x45x8mm | 22x20x5mm | 13x9x4mm |
| Sample Description | - | Beige fibre cement material | Brown fibrous matted material | Grey fibre cement material | Grey cement material |
| Asbestos ID in materials | - | No asbestos detected<br>Organic fibres detected | No asbestos detected<br>Organic fibres detected | Chrysotile asbestos detected<br>Amosite asbestos detected | No asbestos detected |
| Trace Analysis | - | No asbestos detected | No asbestos detected | [NT] | No asbestos detected |

| Lead in Paint | | | | | | |
|---|---|---|---|---|---|---|
| Our Reference | | 353578-20 | 353578-21 | 353578-22 | 353578-23 | 353578-24 |
| Your Reference | UNITS | LP1 | LP2 | LP3 | LP4 | LP5 |
| Date Sampled | | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 |
| Type of sample | | Paint | Paint | Paint | Paint | Paint |
| Date prepared | - | 13/06/2024 | 13/06/2024 | 13/06/2024 | 13/06/2024 | 13/06/2024 |
| Date analysed | - | 13/06/2024 | 13/06/2024 | 13/06/2024 | 13/06/2024 | 13/06/2024 |
| Lead in paint | %w/w | 0.35 | 0.24 | 0.064 | 0.04 | 0.095 |

| Lead in Paint | | | | | | |
|---|---|---|---|---|---|---|
| Our Reference | | 353578-25 | 353578-26 | 353578-27 | 353578-28 | 353578-29 |
| Your Reference | UNITS | LP6 | LP7 | LP8 | LP9 | LP10 |
| Date Sampled | | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 | 29/05/2024 |
| Type of sample | | Paint | Paint | Paint | Paint | Paint |
| Date prepared | - | 13/06/2024 | 13/06/2024 | 13/06/2024 | 13/06/2024 | 13/06/2024 |
| Date analysed | - | 13/06/2024 | 13/06/2024 | 13/06/2024 | 13/06/2024 | 13/06/2024 |
| Lead in paint | %w/w | 0.072 | <0.005 | 0.30 | 0.097 | 0.85 |

| Lead in swab | | | |
|---|---|---|---|
| Our Reference | | 353578-30 | 353578-31 |
| Your Reference | UNITS | LD1 | LD2 |
| Date Sampled | | 29/05/2024 | 29/05/2024 |
| Type of sample | | Swab | Swab |
| Date prepared | - | 12/06/2024 | 12/06/2024 |
| Date analysed | - | 12/06/2024 | 12/06/2024 |
| Lead in Swabs | µg/swab | 1,600 | 2,800 |

| Method ID | Methodology Summary |
|---|---|
| **ASB-001** | Asbestos ID - Qualitative identification of asbestos in bulk samples using Polarised Light Microscopy and Dispersion Staining Techniques including Synthetic Mineral Fibre and Organic Fibre as per Australian Standard 4964-2004. |
| **Metals-020/021/022** | Digestion of Paint chips/scrapings/liquids for Metals determination by ICP-AES/MS and or CV/AAS. |
| **Metals-020/021/022** | Acid digestion of Dust wipes/swabs and /or miscellaneous samples for metals determination by ICP-AES/MS and/or CV-AAS |

| QUALITY CONTROL: Lead in Paint | | | | | | Duplicate | | | Spike Recovery % | |
|---|---|---|---|---|---|---|---|---|---|---|
| Test Description | Units | PQL | Method | Blank | # | Base | Dup. | RPD | LCS-1 | [NT] |
| Date prepared | - | | | 13/06/2024 | 26 | 13/06/2024 | 13/06/2024 | | 13/06/2024 | [NT] |
| Date analysed | - | | | 13/06/2024 | 26 | 13/06/2024 | 13/06/2024 | | 13/06/2024 | [NT] |
| Lead in paint | %w/w | 0.005 | Metals-020/021/022 | <0.005 | 26 | <0.005 | 0.005 | 0 | 106 | [NT] |

| QUALITY CONTROL: Lead in swab | | | | | | Duplicate | | | Spike Recovery % | |
|---|---|---|---|---|---|---|---|---|---|---|
| Test Description | Units | PQL | Method | Blank | # | Base | Dup. | RPD | LCS-1 | [NT] |
| Date prepared | - | | | 12/06/2024 | [NT] | [NT] | [NT] | [NT] | 12/06/2024 | [NT] |
| Date analysed | - | | | 12/06/2024 | [NT] | [NT] | [NT] | [NT] | 12/06/2024 | [NT] |
| Lead in Swabs | µg/swab | 1 | Metals-020/021/022 | <1 | [NT] | [NT] | [NT] | [NT] | 104 | [NT] |

## Result Definitions

| | |
|---|---|
| **NT** | Not tested |
| **NA** | Test not required |
| **INS** | Insufficient sample for this test |
| **PQL** | Practical Quantitation Limit |
| **<** | Less than |
| **>** | Greater than |
| **RPD** | Relative Percent Difference |
| **LCS** | Laboratory Control Sample |
| **NS** | Not specified |
| **NEPM** | National Environmental Protection Measure |
| **NR** | Not Reported |

## Quality Control Definitions

| | |
|---|---|
| **Blank** | This is the component of the analytical signal which is not derived from the sample but from reagents, glassware etc, can be determined by processing solvents and reagents in exactly the same manner as for samples. |
| **Duplicate** | This is the complete duplicate analysis of a sample from the process batch. If possible, the sample selected should be one where the analyte concentration is easily measurable. |
| **Matrix Spike** | A portion of the sample is spiked with a known concentration of target analyte. The purpose of the matrix spike is to monitor the performance of the analytical method used and to determine whether matrix interferences exist. |
| **LCS (Laboratory Control Sample)** | This comprises either a standard reference material or a control matrix (such as a blank sand or water) fortified with analytes representative of the analyte class. It is simply a check sample. |
| **Surrogate Spike** | Surrogates are known additions to each sample, blank, matrix spike and LCS in a batch, of compounds which are similar to the analyte of interest, however are not expected to be found in real samples. |

Australian Drinking Water Guidelines recommend that Thermotolerant Coliform, Faecal Enterococci, & E.Coli levels are less than 1cfu/100mL. The recommended maximums are taken from "Australian Drinking Water Guidelines", published by NHMRC & ARMC 2011.

The recommended maximums for analytes in urine are taken from “2018 TLVs and BEIs”, as published by ACGIH (where available). Limit provided for Nickel is a precautionary guideline as per Position Paper prepared by AIOH Exposure Standards Committee, 2016.

Guideline limits for Rinse Water Quality reported as per analytical requirements and specifications of AS 4187, Amdt 2 2019, Table 7.2

## Laboratory Acceptance Criteria

Duplicate sample and matrix spike recoveries may not be reported on smaller jobs, however, were analysed at a frequency to meet or exceed NEPM requirements. All samples are tested in batches of 20. The duplicate sample RPD and matrix spike recoveries for the batch were within the laboratory acceptance criteria.

Filters, swabs, wipes, tubes and badges will not have duplicate data as the whole sample is generally extracted during sample extraction.

Spikes for Physical and Aggregate Tests are not applicable.

For VOCs in water samples, three vials are required for duplicate or spike analysis.

Duplicates: >10xPQL - RPD acceptance criteria will vary depending on the analytes and the analytical techniques but is typically in the range 20%-50% – see ELN-P05 QA/QC tables for details; <10xPQL - RPD are higher as the results approach PQL and the estimated measurement uncertainty will statistically increase.

Matrix Spikes, LCS and Surrogate recoveries: Generally 70-130% for inorganics/metals (not SPOCAS); 60-140% for organics/SPOCAS (+/-50% surrogates) and 10-140% for labile SVOCs (including labile surrogates), ultra trace organics and speciated phenols is acceptable.

In circumstances where no duplicate and/or sample spike has been reported at 1 in 10 and/or 1 in 20 samples respectively, the sample volume submitted was insufficient in order to satisfy laboratory QA/QC protocols.

When samples are received where certain analytes are outside of recommended technical holding times (THTs), the analysis has proceeded. Where analytes are on the verge of breaching THTs, every effort will be made to analyse within the THT or as soon as practicable.

Where sampling dates are not provided, Envirolab are not in a position to comment on the validity of the analysis where recommended technical holding times may have been breached.

Where matrix spike recoveries fall below the lower limit of the acceptance criteria (e.g. for non-labile or standard Organics <60%), positive result(s) in the parent sample will subsequently have a higher than typical estimated uncertainty (MU estimates supplied on request) and in these circumstances the sample result is likely biased significantly low.

Measurement Uncertainty estimates are available for most tests upon request.

Analysis of aqueous samples typically involves the extraction/digestion and/or analysis of the liquid phase only (i.e. NOT any settled sediment phase but inclusive of suspended particles if present), unless stipulated on the Envirolab COC and/or by correspondence. Notable exceptions include certain Physical Tests (pH/EC/BOD/COD/Apparent Colour etc.), Solids testing, total recoverable metals and PFAS where solids are included by default.

Samples for Microbiological analysis (not Amoeba forms) received outside of the 2-8°C temperature range do not meet the ideal cooling conditions as stated in AS2031-2012.