

# Health and Safety - Asbestos Management Procedure

## Section 1 - Purpose / Objectives

- (1) To prevent asbestos-related disease resulting from exposure to airborne asbestos in the workplace.
- (2) To ensure asbestos containing materials are managed and controlled according to Victorian and Australian legislative requirements.

## Section 2 - Scope / Application

- (3) This procedure applies:
  - a. across the University including Victoria University buildings, surface coverings, portable equipment, plant and devices;
  - b. to VU Facilities Staff, Contractors performing work for the University, OH&S Advisors, Victoria University Staff and Asbestos Consultants.

## Section 3 - Definitions

(4) ACM - Asbestos Containing Material. This can include cement sheeting, vinyl floor tiles, ceiling tiles, insulation of old furnaces, boilers and water heaters, bar heaters, heating mantles, pump gaskets, pipe gaskets, switchboard linings, heat resistant mats and asbestos gloves.

(5) Asbestos - Naturally occurring fibrous minerals. Asbestos was commonly used in a wide variety of industrial, Manufacturing, building and construction applications in Australia between the 1940s and late 1980s. The presence of asbestos does not pose health risks unless it is broken, in poor or deteriorated condition, or disturbed during activities that produce dust containing asbestos fibres. Inhalation of asbestos fibres is a serious health risk and can lead to diseases such as mesothelioma, lung cancer and asbestosis.

(6) Asbestos Consultant - Audit - An Occupational Hygienist - A qualified Occupational Hygienist with specialist knowledge appointed to identify all ACM in Victoria University buildings and major building equipment items and update the Asbestos Registers. This may include testing of Asbestos Containing Materials.

(7) Asbestos Consultant - Removal - A qualified Occupational Hygienist, who is an independent party, with specialist knowledge to oversee the requirements for asbestos removal to ensure that all aspects of the removal specification are strictly followed. For small asbestos jobs this may be a suitably qualified member of the OH&S Team.

(8) Asbestos Coordinator - the person appointed by the University to act as the main contact for asbestos related issues. This person is responsible for the safe management of asbestos within the University.

(9) Asbestos Disturbance - Where actions to asbestos containing materials occur causing airborne asbestos fibres. For example where asbestos containing materials are removed, cut, damaged or drilled or where enclosed areas which

contain ACM are opened and/or entered.

(10) Asbestos Exposure - where airborne asbestos fibres are inhaled. The asbestos concentration which could impact on health is above 0.1 fibres per millilitre measured as a time weighted average over an 8 hour working day in a person's breathing zone according to the required standards.

(11) Asbestos Removalist - a company appointed by the principal contractor or directly by the University and must be licenced for asbestos removal works with the Worksafe under Part 4 of the Victorian OH&S Regulations 2007.

(12) Asbestos Register - a register identifying all the locations where asbestos is present within the University. The Register details the location of asbestos containing materials in all buildings, its condition and priority classification.

(13) Contractor - maintenance person or company or builder engaged by the University to undertake, maintenance, construction or upgrade works.

(14) Contracted Maintenance Provider - a company engaged by the University to manage all day-to-day facilities works and services and the works and services contractors.

(15) Division 5 Risk Assessment - Assessment of the health risk associated with the presence of asbestos. In general, the Division 5 Risk Assessment provides an overview of the entire University. Identified in this procedure as the Asbestos Register.

(16) Division 6 Risk Assessment - Prior to the commencement of any works, the employer or occupier of the work area must determine whether asbestos is present. In general, a Division 6 Risk Assessment offers a more detailed assessment of a specific work area.

(17) Friable Asbestos - asbestos-containing materials which, when dry, can be crumbled or pulverized to a powder by hand or, as a result of a work process, becomes such that it may be crumbled, pulverised or reduced to powder by hand pressure.

(18) HEPA - High efficiency particulate arrestance (or air) filter.

(19) NATA - National Australian Testing Authority - approves the methods and accredits the providers of asbestos content determinations and sampling for airborne asbestos fibres.

(20) Nominated Builder - Where capital works exceed \$350,000 the Nominated Builder will assume the responsibilities of the Asbestos Coordinator.

(21) Non-friable Asbestos - Asbestos containing materials that when dry, cannot be crumbled by hand pressure.

(22) Priority Risk Ratings -

- a. P1: Hazards with High Risk Potential - These areas are isolated, labelled and addressed as soon as is practicable.
- b. P2: Hazards with Elevated Risk Potential.
- c. P3: Do not currently pose a significant risk to health and safety.
- d. P4: No access during survey.

(23) Quicksafe - Victoria University's Incident Management System.

(24) Recfind - Victoria University's Document Records System.

(25) VU Facilities Project Manager - The Victoria University Facilities staff person responsible for managing the works. Staff who plan and oversee works for a given building demolition, excavation or renovation job.

## Section 4 - Policy Statement

(27) Nil

## Section 5 - Procedures

### Roles/Responsibilities

Roles	Responsibility
Director of Facilities	<p>Delegate a responsible person to act as the Asbestos Coordinator.</p> <p>Ensure the Asbestos Coordinator is aware of responsibility and is provided with the necessary support, resources and training to perform the responsibilities detailed in the Asbestos Management Procedure.</p> <p>Keep staff informed of the availability and location of the Asbestos Register, the name and responsibilities of the Asbestos Coordinator and the risk and measures in place to control risks associated with asbestos.</p>
Asbestos Coordinator	<p>Safe management of asbestos in buildings and major building equipment within the University.</p> <p>The following items marked (-) may be delegated to a Contracted Maintenance Provider:-</p> <ul style="list-style-type: none"><li>(-) Management of the University's Asbestos Register (Division 5 Risk Assessment) for all campuses and buildings.</li><li>(-) Maintaining the accuracy of the Asbestos Register by arranging audits by an Asbestos Competent person at least every 5 years.</li><li>(-) Ensure access to Asbestos register for all VU staff with special emphasis on contractors and staff members carrying out maintenance activities.</li><li>(-) Ensure any identified asbestos containing materials, where it is not practicable for removal, are contained, sealed and labelled.</li><li>(-) Arrange for the update of the Victoria University asbestos register where ACMs are identified during periods between the asbestos surveys.</li></ul> <p>Consult with University Management and Health and Safety Representatives regarding current asbestos risk assessments and any planned asbestos removal activities.</p> <p>Summarise and table a one page report of completed ACM risk assessments to University Health and Safety Meetings - the report can be tabled by the OH&amp;S team representative attending these meetings.</p> <p>Ensure any asbestos removal is carried out in compliance with legislative requirements.</p> <p>Retain all past versions of the Asbestos Register and Asbestos Removal documentation.</p> <p>Arrange for immediate remediation for any sites or locations identified during asbestos audits where the asbestos is friable or in poor condition. (P1 sites)</p> <p>Make the required arrangements for Asbestos identification and removal during demolitions, renovations and refurbishments according to the Asbestos Management Procedure - Removal.</p> <p>Work with the OH&amp;S Team to ensure regular Asbestos Awareness Training is available and completed by the required staff.</p> <p>Nominate a deputy to act as the Asbestos Coordinator during absences.</p>

Roles	Responsibility
Asbestos Consultant - Audit	<p>Conduct the asbestos register audit review and update as required.</p> <p>Immediately communicate P1 (see definitions) Level hazard to Asbestos Coordinator for remediation.</p> <p>Forward all required documentation to the Asbestos Coordinator.</p> <p>Placement of labels on asbestos containing materials as they are identified.</p>
OH&S Team	<p>Support the Technical Services and Trades staff in identifying any portable equipment or plant which may contain asbestos.</p> <p>Arrange for sampling and testing of any identified portable equipment which may contain asbestos.</p> <p>Communicate results of any asbestos testing which has been carried out to equipment owners, the relevant VU OH&amp;S meetings and the Asbestos Coordinator to enable update of the Asbestos Register.</p> <p>Assist the Asbestos Coordinator in delivery and management of Asbestos Awareness Training.</p> <p>Support and advise the Asbestos Coordinator, including consultation with staff enquiries with respect to Asbestos health risks.</p> <p>Audit of compliance with this procedure.</p>
Victoria University Staff members and Contracted Personnel	<p>Ensure that any equipment purchased or acquired in current use has been checked to determine asbestos content.</p> <p>Ensure all portable equipment which may contain asbestos is identified, checked by OH&amp;S and labelled as required.</p> <p>Review any demonstration or teaching items brought into class for potential asbestos containing materials.</p> <p>Recognise that purchased or acquired equipment from overseas may contain asbestos. Making the transaction illegal in Australia.</p>
Contractor Maintenance Provider Contractors	<p>Consult the relevant asbestos register prior to carrying out any work which could pose risks of asbestos exposure. E.g. drilling holes, cutting pipework, electrical refurbishment.</p> <p>Ensure a risk assessment which includes ACM identification is conducted prior to commencing work.</p> <p>Follow and ensure staff members abide by the Asbestos Management Procedure - Removal should any ACM be identified.</p>
VU Facilities Project Manager	<p>Review the specific location Asbestos Register (Division 5 Risk Assessment) prior to any minor projects, demolition or refurbishment work.</p> <p>Recognise that excavation may include asbestos contaminated soil.</p> <p>Ensure a risk assessment is conducted prior to work including determining the likelihood of asbestos or other hazardous materials.</p> <p>Where asbestos is identified liaise with the Asbestos Coordinator, engage the correct people to mitigate the risks according to the Asbestos Management Procedure - Removal.</p> <p>Forward all documentation relating to asbestos removal and refurbishment to the Asbestos Coordinator.</p>

Roles	Responsibility
Victoria University Staff	<p>Ensure that no Asbestos is purchased, brought onto University sites, acquired or transported except for approved remediation works.</p> <p>Ensure that any enquiries, concerns or faults relating to asbestos are referred to the Asbestos Coordinator.</p> <p>Ensure no interference with ACM and labels or ACM sealing measures on University property.</p>
College Deans, Vice-Chancellors, Directors and Managers	<p>Ensure that no asbestos containing materials are purchased or brought onto any Victoria University Location.</p> <p>Ensure that their locations of responsibility have current building Asbestos Registers.</p> <p>Recognise that acquired portable equipment may contain asbestos and ensure checks are made prior to acquisition or use.</p> <p>Ensure that labelling of any asbestos containing materials has taken place within their area of responsibility.</p> <p>Report any issues with respect to Asbestos to the Asbestos Coordinator and the OH&amp;S Team.</p>

## Procedures

### Overall Requirements

(28) As far as is reasonably practicable, any risk associated with the presence of asbestos must be eliminated by removing the asbestos.

- a. If the ACM can't be removed and any risk remains, it must be enclosed.
- b. If the ACM has been enclosed but there is still a health risk, the material must be sealed.
- c. If the ACM is present it must be labelled.

(29) Where asbestos is fully encased and sealed it presents no risk, but this material must be labelled as containing asbestos and listed on the Asbestos Register.

### Prohibited activity

(30) Due to the hazard that it poses, the manufacture, supply, storage, transport, sale, use, re-use, installation and replacement of asbestos is banned across Australia. Care should be exercised when purchasing or acquiring items from other countries as the same legislation may not apply in jurisdictions other than Australia.

### Identify Asbestos Containing Materials

(31) The Asbestos Coordinator will ensure that asbestos containing materials at each Victoria University Workplace and building are clearly identified (including inaccessible areas) and labelled as far as is reasonably practicable.

(32) This includes identifying when buildings were constructed and what materials were in construction and any asbestos in plant under the control of Victoria University.

(33) Asbestos containing materials are identified using an Asbestos Consultant - Audit. The Asbestos Consultant - Audit must inspect locations, and revise and update the Asbestos Register.

(34) Where there is uncertainty (based on reasonable grounds) as to whether any material is likely to contain asbestos then assume asbestos is present and label accordingly or arrange for analysis of samples.

## **Asbestos Register (Division 5 Review)**

(35) The locations of asbestos containing materials will be recorded in a register which must be kept up to date with all relevant information about the identified ACM. The register must include a record of:

- a. the location of the asbestos
- b. the type of Asbestos Containing Material
- c. the nature of the Asbestos Containing Material (friable or non-friable)
- d. the condition of the ACM
- e. any work activities that may affect or cause damage or deterioration to the ACM. Level of access
- f. Risk priority rating for the material. P1 to P4 (Refer to priority risk ratings in definitions)

(36) It is also beneficial to include floor plans and photographs of asbestos locations and records of any material testing conducted in the Asbestos Register.

(37) The Asbestos Register must be updated whenever there is a change to the condition of any asbestos or if it is removed, enclosed or sealed. Regardless of any changes, the register must be reviewed and updated every five years.

## **Asbestos Containing Materials Labels**

(38) All materials and locations where asbestos containing materials are identified shall be labelled as far as is practicable.

- a. Figure 1: Current ACM Label
- b. Figure 2: Future ACM Label

Further labelling requirements can be found in the VU Guide - Labelling Asbestos Containing Materials.

## **Asbestos Register Access**

(39) Asbestos Register must be readily available to any staff member and the following groups who may be engaged by the University to carry out work.

- a. External contractors who may be engaged to carry out drilling or cutting work on floors or walls. This includes Information Technology Services and Audio Visual Technicians.
- b. An asbestos licence holder who has been engaged to do asbestos removal work.
- c. Those who perform the following asbestos-related activities:
  - i. Sample or analyse suspected asbestos
  - ii. Enclose or seal asbestos containing materials
  - iii. Hand-drill or cut asbestos containing materials
  - iv. Conduct research involving asbestos
- d. Persons who perform any other work activity likely to produce asbestos airborne fibres in excess of one half of the asbestos exposure standard.
- e. Before they start, any contractors who are engaged to perform work that involves the risk of exposure to asbestos must be given a copy of the asbestos register. The register must include the location of the asbestos.
- f. Anyone who takes over management or control of the workplace.

## **Planning and Quoting Demolition, Excavation and Refurbishment work**

(40) The VU Facilities Project Manager must ensure that a copy of the Asbestos Risk Assessment is provided to Contractors/Asbestos Consultants who are planning or quoting for any works involving the disturbance of asbestos containing materials.

(41) The asbestos register must also be reviewed by the VU Facilities Project Manager and the Contractor before undertaking any demolition or refurbishment work. This applies to any work involving the potential disturbance of walls, floors ceilings, etc. and including scraping, screwing, cutting or painting which includes sanding.

(42) Architects, Contractors or staff must consult with the VU Facilities Project Manager and the Asbestos Coordinator during the planning stage so that if asbestos is present, the ACM is removed or alternative methods can be used to avoid disturbing the sealed asbestos.

### **Works Where Asbestos Containing Materials are Identified and/or may be Disturbed**

(43) Activities where there is asbestos disturbance, including entry into crawl spaces under buildings or rooms which have been sealed off require the person organizing the work and/or the VU [Facilities Asbestos Management Procedure - Removal](#) .

### **Accidental Damage to Asbestos-containing Materials during Works or Usual University Operations**

(44) If accidental damage occurs to any asbestos-containing material during the course of a works project or during the usual course of University operations.

(45) The contractor must stop work immediately, students and staff shall immediately vacate the immediate area.

(46) The contractor or the student supervisor will advise the VU Facilities Project Manager/Contractor Maintenance Provider who will contact.

- a. The Asbestos Coordinator, and the Occupational Health and Safety team and take appropriate steps to prevent access to the affected or ensure that the area is made safe.

For example: Where a small dent or hole is made, (less than hand size) covering and sealing a broken edge and ensuring appropriate ventilation before allowing re-entry to the area.

For larger damage or disturbance, the VU Facilities Project Manager shall contact the Asbestos Coordinator who will make arrangements according to the Asbestos Management Procedure - Removal.

In the case of a large area (greater than hand size) of ACM disturbance Contractors, Staff and students will not reoccupy the room or location until they have been advised it is safe to do so after a clearance has been issued by an Asbestos Consultant- Removal in writing.

### **Training**

(47) Asbestos Awareness Training - Initial session to be completed by the following groups with at least 3 yearly Asbestos Refresher Training which may be completed on-line:

- a. VUIT building lecturers - (who at times carry out their own renovations)
- b. Contracted maintenance - Primary contractor and any other contractors working on buildings where holes may be drilled, cement sheeting cut or work with old water pipework is involved.
- c. Facilities Team
- d. Asbestos Coordinator
- e. Contracted Maintenance Provider staff members arranging and supervising work
- f. Contractors involved in the installation of computer cables and audio visual equipment
- g. OH&S Team
- h. Technical staff - group supporting laboratories

(48) Training records shall be retained in the Victoria University training management system.

## **Record Keeping**

(49) The Asbestos Coordinator must ensure that all current documents regarding asbestos matters are maintained in a centralised file and archived documents are retained in the Victoria University Document Records System in accordance with legislated records retention times. Records should include:

- a. Asbestos Management Procedure - intranet document reviewed and updated by the OH&S Team in conjunction with the Asbestos Coordinator and the Associate Director, Operations Planning, Facilities.
- b. Asbestos Register and the regular audit and risk assessment reports (Division 5 and Division 6 Asbestos Audits, Hazardous Building Materials Audit).
- c. To provide relevant information in the event of an emergency, a hardcopy of the Asbestos Register for the relevant building will be located in the locked ESM: Essential Services Management boxes adjacent to the fire panel for that building.
- d. Any incidents of accidental damage or unforeseen asbestos identification are recorded in the VU Incident Management system.

## **OH&S Incident Management System and People and Culture Workplace shall retain records of:**

(50) Incidents involving asbestos - within the incident management system.

(51) Medical records of staff members who have been identified as potentially exposed (by proximity to an incident where the concentration of airborne asbestos fibres may have exceeded a concentration of 0.1fibre per millilitre) to asbestos during the course of their work - for the regulated time period.

## **Limited Asbestos Removal Work**

(52) Where limited asbestos removal work is considered and/or planned the VU Asbestos Coordinator must be consulted.

(53) Small amounts of unlicensed asbestos work can be carried out but must comply with strict safety requirements. The material must be non-friable, less than 10m<sup>2</sup> and the work of cumulative duration is 1 hour or less in any period of seven days.

- a. A documented asbestos control plan must be developed in conjunction with an Asbestos Consultant and the Asbestos Coordinator must be completed prior to commencement of the work.
- b. All staff involved in the work must have current Asbestos Awareness Training where records are retained.
- c. The proposed work area must be isolated, barricaded and labelled.
- d. Communication and consultation with staff working in the area and relevant Health and Safety Representative/s.
- e. The work must be carried out in such a way to minimise the generation of airborne dust. This may include spraying the surface with water or PVA glue/water mixture prior to the work.
- f. Only hand tools can be used. No mechanically operated tools.
- g. Staff must wear respiratory protection, safety eyewear, and asbestos fibre resistant disposable overalls. (Refer to PPE Section below.)
- h. All disposable overalls and respirator filters shall be disposed of at the barrier of the work area into the double wrapped and labelled plastic bags for asbestos removal.
- i. Clean up shall be using damp rags or vacuuming where the unit has a HEPA filter. No dry broom sweeping or compressed air. All clean up materials double wrapped and disposed of as per asbestos removal.
- j. Any asbestos waste must be double wrapped in labelled plastic bags.
- k. Asbestos Containing materials are classified as prescribed waste and as such must be disposed of according to



the Environment Protection (Industrial Waste Resource) Regulations 2009.

### **Testing of Asbestos Containing Materials**

(54) All testing of suspected asbestos containing materials shall be conducted by a NATA accredited laboratory which must be independent of the University.

### **Asbestos in Portable Equipment**

(55) The Asbestos Register also contains a short listing of portable equipment identified as possibly asbestos containing. Tests for asbestos content have been conducted, and recorded on the register, where the ACM is not fully contained any items with ACM have been removed.

(56) Additional portable equipment may be identified as potentially asbestos containing. If this is the case, notify the supervisor who will notify the OH&S team. An OH&S Team member with Occupational Hygiene qualifications or an Asbestos Consultant - Audit shall inspect and test these materials as required and report results to the persons requesting testing and the Asbestos Coordinator for inclusion in the Asbestos Register. Where materials are identified as asbestos containing or potentially asbestos containing and not fully sealed they shall be removed according to required asbestos removal procedures or, if fully contained, will be labelled to indicate that they may contain asbestos.

### **Mandatory PPE during Asbestos Removal**

(57) AS/NZS 1719: Selection, Use and Maintenance of Respiratory Protection - Compliant P2 respirator.

(58) Disposable coveralls of a suitable standard to prevent penetration of asbestos fibres.

(59) Disposable coveralls rated type 5, category 3 (pr EN ISO 13982-1) or equivalent meet this standard and are suitable for use during asbestos removal.

## **Section 6 - Guidelines**

(60) Nil

## **Section 7 - References**

(61) This procedure is required to support the following:

- a. [Health and Safety Policy](#)

## **Section 8 - Supporting Documents**

(62) The following documents have been referenced in this procedure:

- a. [VU Asbestos Registers](#)
- b. [VU Asbestos Management Procedure - Removal](#)
- c. [VU Asbestos Labelling Guidelines](#)
- d. Guidance: - [Worksafe Victoria Asbestos Information Site](#)
- e. EPA Victoria - [Environment Protection \(Industrial Waste Resource\) Regulations 2009](#)
- f. VU Asbestos Awareness Refresher Training: - To be developed.

- g. Asbestos Regulations - Victorian Government [Occupational Health and Safety Regulations 2017](#) Section 4 Asbestos
- h. VU Contractor Management Procedure - General Contractor:- Currently under review
- i. VU Purchasing New Equipment and Material: - Currently under review.
- j. VU Archived Records of Asbestos Registers/Removals Procedure Control- VU RecFind

## Status and Details

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<b>Effective Date</b>	7th March 2016
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