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**Report on Hazardous Building Materials  
(HAZMAT) Survey**

**270-272 Pacific Highway  
Crows Nest NSW**

**Prepared for Silvernights (Crows Nest)  
Landowner Pty Ltd**

**Project 214296.04**

**18 July 2025**

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

### Signature

### Date

<b>Author</b>		18 July 2025
<b>Reviewer</b>		18 July 2025

## Executive Summary

Douglas Partners Pty Ltd (Douglas) was engaged by Silvernight (Crows Nest) Landowner Pty Ltd (the 'client') to conduct a Hazardous Building Materials (HAZMAT) survey at 270-272 Pacific Highway, Crows Nest NSW (the Site). The purpose of the assessment, which comprised a walkthrough visual inspection and limited program of field testing and sample analysis, was to identify HAZMAT comprising:

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

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

**Table 1: Hazardous building materials (HAZMAT) risk profile**

Building	Asbestos	Lead paint	Lead dust	PCB
North Tower	✓	✓	✓	✓
South Tower	✓	✓	✓	✓

PCB = polychlorinated biphenyls, ✓ = identified or suspected present, ✕ = not identified and / or not suspected present. Refer to the Register(s) in Appendices B 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.

A destructive and intrusive HAZMAT survey of all rooms and areas in all buildings is warranted and recommended prior to building modification – including demolition, refurbishment, maintenance and similar work - but can normally only be undertaken following vacant possession.

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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# Report on Hazardous Building Materials (HAZMAT) Survey, 270-272 Pacific Highway, Crows Nest NSW

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## 1. Introduction

Douglas Partners Pty Ltd (Douglas) was engaged by Silvernight (Crows Nest) Landowner Pty Ltd (the 'client') to conduct a Hazardous Building Materials (HAZMAT) survey at 270-272 Pacific Highway, Crows Nest NSW (the Site). The purpose of the assessment, which comprised a walkthrough visual inspection and limited program of field testing and sample analysis, was to identify HAZMAT comprising:

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

This report provides relevant background information, outlines the scope of work conducted, the methods used, the results obtained, and provides general management recommendations.

The overall results of the assessment are indicated by the HAZMAT Risk Profile in Table 1 of the Executive Summary.

Note about this report, along with building layout plans, are 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 6 of this report (including Table 4).

## 2. Site description

The Site is located at 270-272 Pacific Highway, Crows Nest NSW (refer Figure 1). The buildings at the site comprise two multi-storey commercial office blocks (i.e. North Tower and South Tower). These towers are connected by a covered walkway at street-level and a common basement carpark. Both towers were generally occupied during this assessment.



**Figure 1: Site location and approximate boundary (yellow outline)**

Source: SIX Maps

### 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 broad responsibilities on key duty holders to promote and secure workplace safety and health. The WHS Regulation also specifies requirements for 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, 2<sup>nd</sup> Edition* [NOHSC:3003(2005)];
- AS/NZS 4361.1, *Guide to hazardous paint management, Part 1 – Lead and other hazardous metallic pigments in industrial applications*;

- AS/NZS 4361.2, *Guide to hazardous paint management, Part 2 – Lead paint in residential, public and commercial buildings*;
- NSW EPA *Polychlorinated Biphenyl (PCB) Chemical Control Order, 1997*;
- Environment Protection and Heritage Council *Polychlorinated Biphenyls Management Plan, Revised Edition, April 2003*; and
- NSW Protection of the Environment Operations (POEO) Act and subordinate POEO Regulations.
- NSW Environment Protection Authority (EPA) Waste Classification Guidelines including:
  - o Part 1: *Classifying Waste, November 2014 (EPA, 2014)*.

#### 4. Method

The assessment conducted by Douglas was limited to the buildings identified in Table 1 of this report and comprised a non-destructive, non-intrusive, walkthrough visual inspection supplemented by a limited program of testing and sample analysis. A non-destructive, non-intrusive inspection was conducted due to general occupation of the buildings and the early stage of planning for redevelopment.

The testing and sample analysis regimes adopted comprised screening assessments only and are not designed to delineate the extent of HAZMAT or hazard areas. Testing and sampling was only undertaken in vacant tenancies, plant / utility rooms and similar areas to minimise occupant disturbance.

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 AS 4964-2004 *Method for the qualitative identification of asbestos in bulk samples*.

Paints were screened for lead using 3M™ LeadCheck™ colourimetric 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.

Dust is sampled from ceiling cavities only where these cavities are readily accessible. In such cases, surface wipe or bulk sampling techniques are adopted. Samples are generally collected from a surface area of 100 or 900 cm<sup>2</sup> and analysed for lead (total, µg) by a NATA accredited laboratory. Analysis results are then used to determine the lead loading (mg / m<sup>2</sup>).

Fluorescent light fittings were visually inspected and an assessment of PCB content made based on apparent age and/or start type (i.e. resonant vs. instant start). Light fittings were not dismantled to confirm capacitor or ballast details.

In order to minimise occupant disturbance, assessment of occupied tenancies was limited to a brief visual inspection only and excluded access into ceiling cavities. Ceiling cavities were inspected in selected, readily accessible locations in vacant tenancies and common areas only.

Limitations apply to the method(s) adopted and, as such, Douglas cannot guarantee that all HAZMAT or issues of concern have been identified.

The assessment specifically excluded:

- Isolation and work on energised plant, services and equipment;
- Dismantling and disassembly;
- Entry into confined spaces and crawl spaces;
- Buried items (e.g. pipes, drains, pits, conduits, footings and formwork);
- Contamination in fill / soil including mulch; and
- Materials hidden or intimately incorporated into the building(s) such that were not readily accessible using the proposed inspection methods.

## 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**

<b>Risk factor</b>	<b>Score</b>	<b>Description</b>
<b>Friability</b>	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).
<b>Condition</b>	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.
<b>Treatment</b>	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.
<b>Accessibility</b>	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.
<b>Activity</b>	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.
<b>Ventilation</b>	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, including the results of asbestos risk assessments, are provided in the Register in Appendix B.

While identification of bulk Synthetic Mineral Fibre (SMF) insulation materials was not part of the scope of work conducted, details of certain occurrences of SMF are included in Appendix B for informative purposes.

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

**Table 4: Access limitations\***

Location / area	Access type	Reason(s)
Areas / materials at height	Limited	Access limited to safely accessible areas and use of 3.7 m multi-fold ladder. Work at height and use of specialised access equipment were not included in the scope of this assessment.
Confined spaces (e.g. interior of tanks and pits) and crawl spaces	Nil	Access to confined spaces and crawl spaces was outside the scope of this assessment.
Ceiling and other building cavities (e.g. wall cavities)	Nil	Access to building cavities was outside the scope of this assessment.
Subfloor voids	Nil	Access to subfloor voids was outside the scope of this assessment.
Below ceramic tiled surfaces (e.g., walls and floors in wet areas)	Nil	Access requires destructive / intrusive inspection methods. Access below ceramic tiled surfaces was outside the scope of this assessment.
Fluorescent light fittings, internal components	Nil	Electrical isolation and dismantling of light fittings was outside the scope of this assessment.
Other potentially energised plant, equipment and services (e.g. electrical panels, lift motor, ducts).	Nil	Electrical isolation and dismantling of plant, equipment and services was outside the scope of this assessment.
Subsurface areas including building footings and contamination in soil / fill and mulch	Nil	Not included in the scope of this assessment.
Below exposed floor coverings (e.g. carpets, vinyl sheeting) and sheathed pipes and plant	Limited	Access limited due to the non-destructive and non-intrusive nature of the investigation conducted.
Rooms and areas in general	Limited	Access limited due to general occupation of the building, furnishings, fixtures, storage etc.
North Tower, Ground Floor, Tenancy 7 (Mater Dialysis Clinic), northern section	Nil	Reported COVID isolation area. No access permitted.
South Tower, Unit 204 and unlabelled northeastern unit on Level 4	Nil	No keys available from on-site Contractor or Tenant lock boxes, and/or Building Manager.
Open roof tops	Nil or limited	Nil access to rooftops at Ground Level / Level 1 (no designated safe access points identified). Limited access at Level 5 due to electric and magnetic field (EMF) radiation hazards and working at height requirements etc.

\* 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 assessed is provided in the Register (Appendix B). The general recommendations in Section 7.1 onwards are provided for informative purposes and should be considered where the relevant HAZMAT has been identified or suspected present by Douglas, or is subsequently suspected present based on reasonable grounds.

Any inaccessible areas should generally be suspected to 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, or in other similar buildings.

A destructive and intrusive HAZMAT survey of all rooms and areas in all buildings is warranted and recommended prior to building modification – including demolition, refurbishment, maintenance and similar work - but can normally only be undertaken following vacant possession.

### 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 to the relevant duty holder(s); 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.

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.

HAZMAT remediation and removal work, and general demolition work, should be supervised and undertaken by personnel that have the qualifications, training and experience required to identify any additional, unexpected occurrences of HAZMAT in a timely manner that precludes exposure and cross-contamination.

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 with 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<sup>2</sup> 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 (i.e. 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. Additionally, targeted sampling and analysis for lead paints should also be undertaken 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, *Guide to hazardous paint management, Part 1 - Lead and other hazardous metallic pigments in industrial applications*; and
- AS/NZS 4361.2, *Guide to hazardous paint management, Part 2 - 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 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 with 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<sup>3</sup>. 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 requirement to comply with 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) Rule, *Reconsideration of the Dust-Lead Hazard Standards and Dust Lead Post-Abatement Clearance Levels* (89 FR 89416) published 11 December 2024, outlines the following proposed Dust-Lead Clearance Levels (DLCL) for assessment of post-abatement dust-lead levels<sup>1</sup>:

- Floors: 5 µg / ft<sup>2</sup> (~0.05 mg / m<sup>2</sup>) lead;
- Interior window sills: 40 µg/ft<sup>2</sup> (~0.43 mg / m<sup>2</sup>) lead; and
- Window troughs: 100 µg / ft<sup>2</sup> (~1.1 mg / m<sup>2</sup>) 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.

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<sup>1</sup> National Archives, Federal Register, The Daily Journal of the United State Government, accessed at: <https://www.federalregister.gov/documents/2024/11/12/2024-25070/reconsideration-of-the-dust-lead-hazard-standards-and-dust-lead-post-abatement-clearance-levels> accessed on: 10 February 2024.

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 with 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<sup>3</sup>.

Air monitoring for lead may be required based on the results of risk assessment and the requirement to comply with 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 Polychlorinated biphenyls (PCBs)

Prior to any significant disturbance, such as demolition, refurbishment or maintenance works, fluorescent light and fan 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 when necessary.

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:

- NSW Protection of the Environment Operations (POEO) Act 1997 and subordinate 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 has prepared this HAZMAT report for Silvernight as described herein and in accordance with our proposal reference 214296.04.P.002.Rev0, 18 June 2025.

This report is provided for the exclusive use of Silvernight 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 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, 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.

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## **Appendix A**

About this Report

Building Layout Plans

## 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

This report is the property of Douglas Partners Pty Ltd. The report may only be used for the purpose for which it was commissioned and in accordance with the Conditions of Engagement for the commission supplied at the time of proposal. Unauthorised use of this report in any form whatsoever is prohibited.

## 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

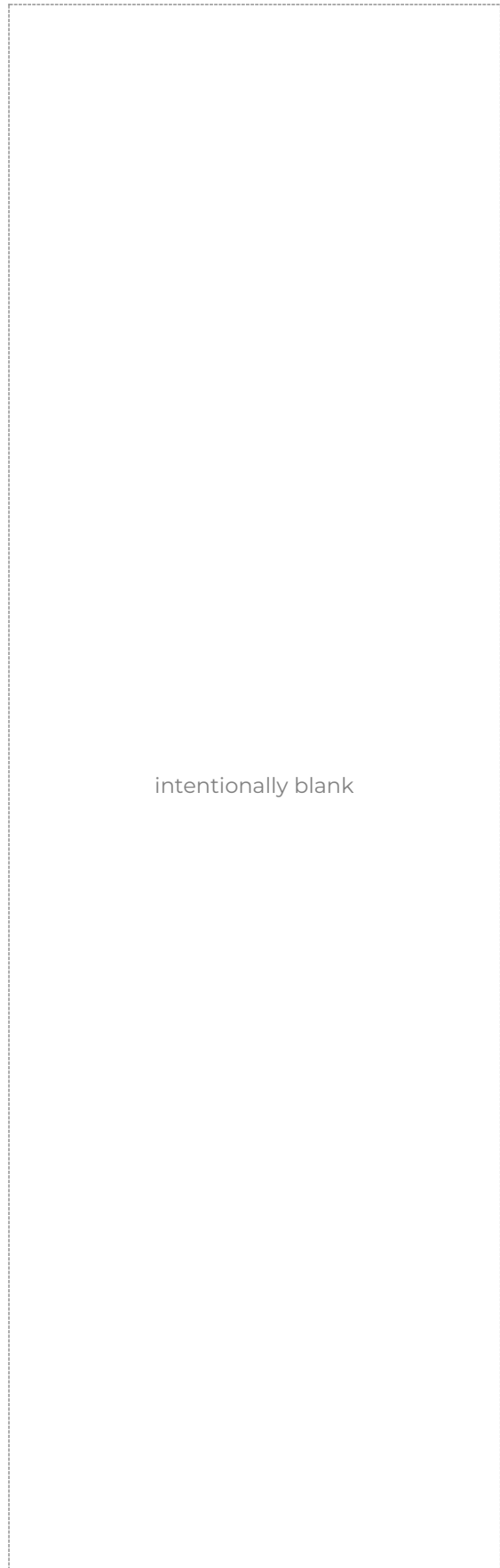
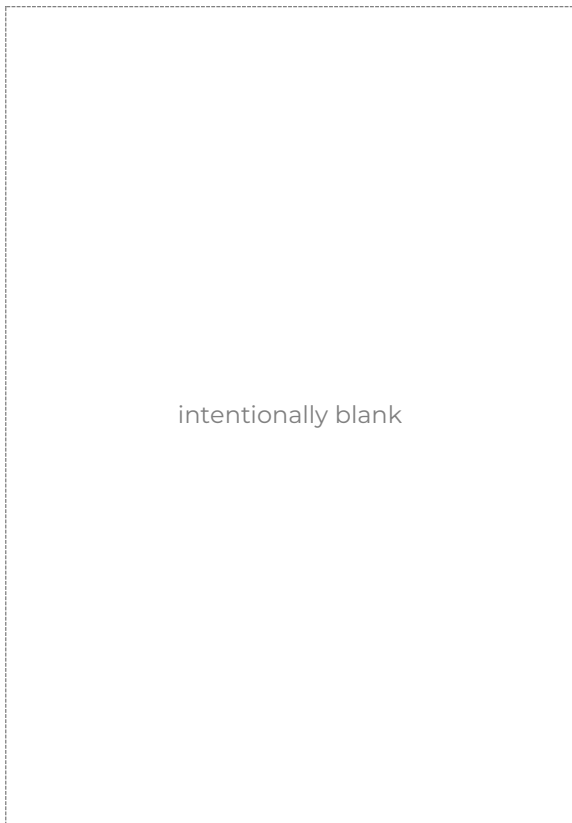
In the event that conditions encountered on site during construction appear to vary from those which were expected from the information contained in the report, DP requests that it be immediately notified. Most problems are much more readily resolved when conditions are exposed rather than at some later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

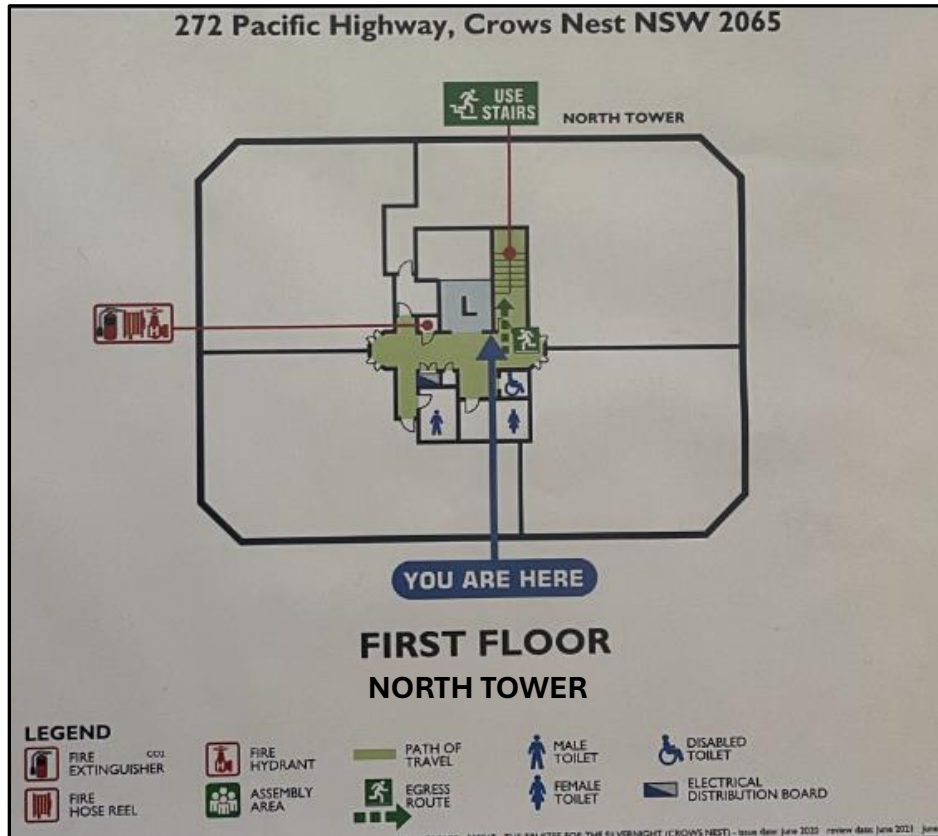
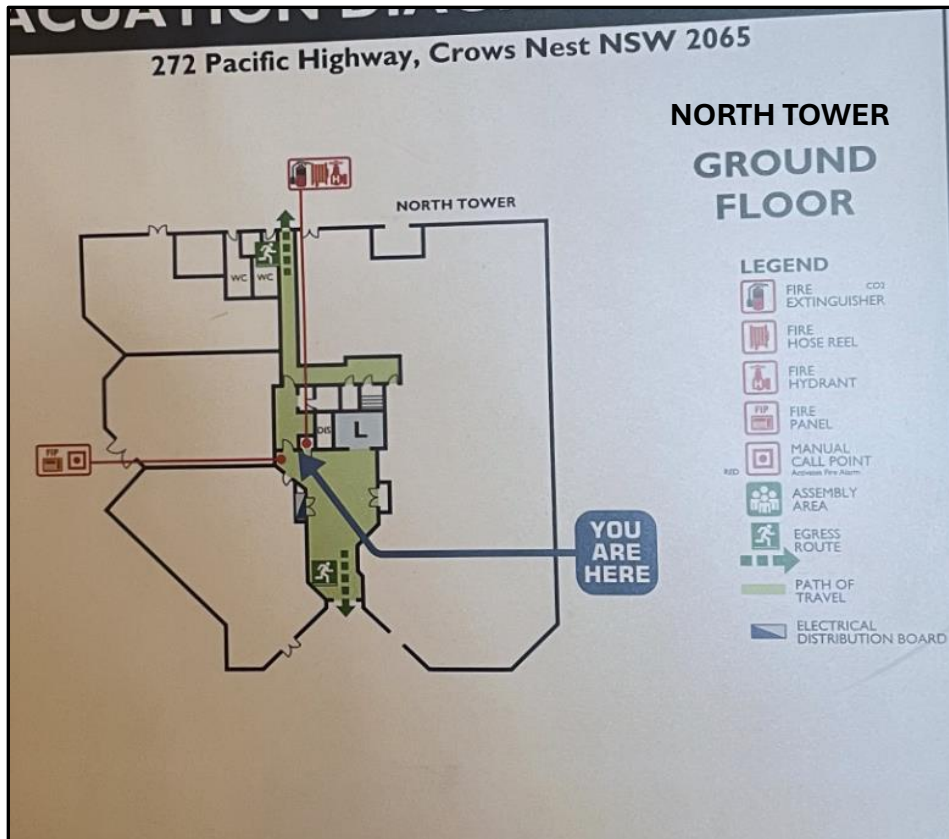
### Information for Contractual Purposes

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.





272 Pacific Highway, Crows Nest NSW 2065

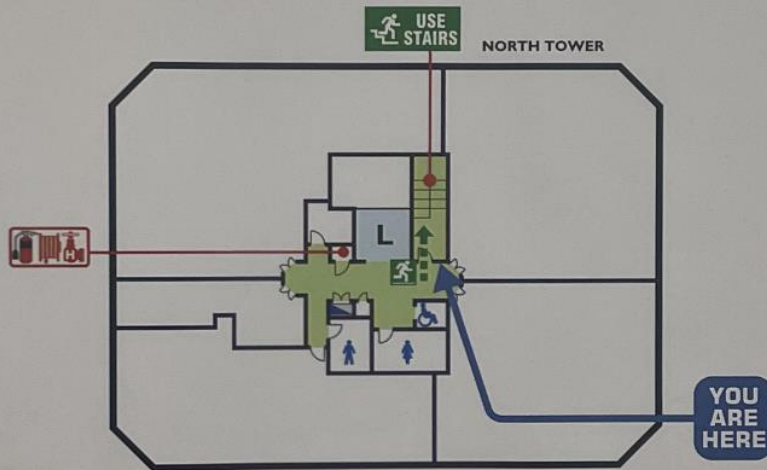


**SECOND FLOOR  
NORTH TOWER**

**LEGEND**

- |                   |               |                |               |                               |
|-------------------|---------------|----------------|---------------|-------------------------------|
| FIRE EXTINGUISHER | FIRE HYDRANT  | PATH OF TRAVEL | MALE TOILET   | DISABLED TOILET               |
| FIRE HOSE REEL    | ASSEMBLY AREA | EGRESS ROUTE   | FEMALE TOILET | ELECTRICAL DISTRIBUTION BOARD |

272 Pacific Highway, Crows Nest NSW 2065



**THIRD FLOOR  
NORTH TOWER**

**LEGEND**

- |                   |               |                |               |                               |
|-------------------|---------------|----------------|---------------|-------------------------------|
| FIRE EXTINGUISHER | FIRE HYDRANT  | PATH OF TRAVEL | MALE TOILET   | DISABLED TOILET               |
| FIRE HOSE REEL    | ASSEMBLY AREA | EGRESS ROUTE   | FEMALE TOILET | ELECTRICAL DISTRIBUTION BOARD |

272 Pacific Highway, Crows Nest NSW 2065



### FOURTH FLOOR NORTH TOWER

**LEGEND**

- FIRE EXTINGUISHER <sup>CO2</sup>
- FIRE HOSE REEL

- FIRE HYDRANT
- ASSEMBLY AREA

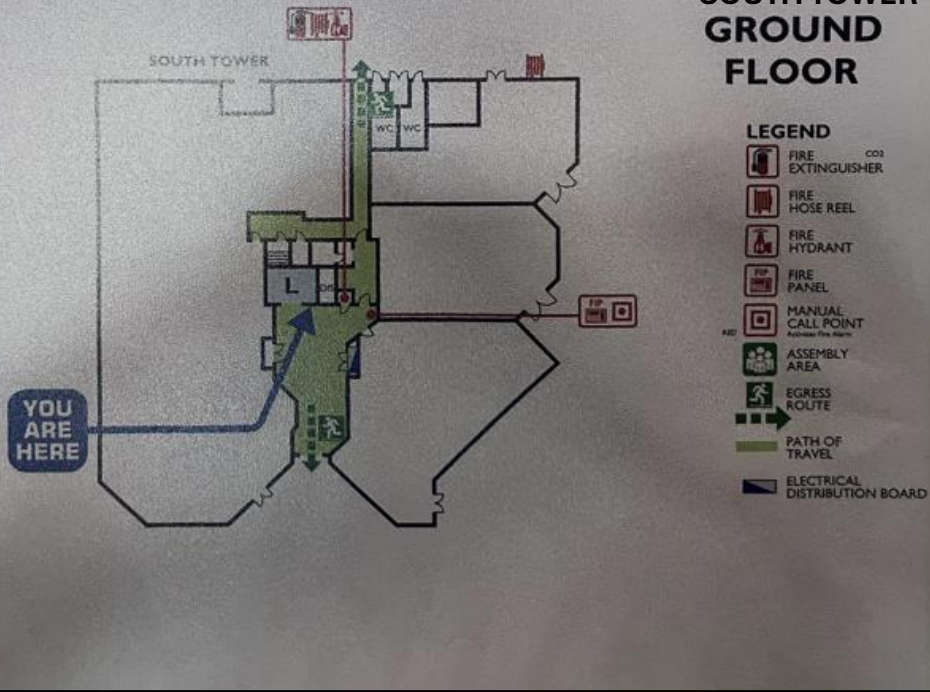
- PATH OF TRAVEL
- EGRESS ROUTE

- MALE TOILET
- FEMALE TOILET

- DISABLED TOILET
- ELECTRICAL DISTRIBUTION BOARD

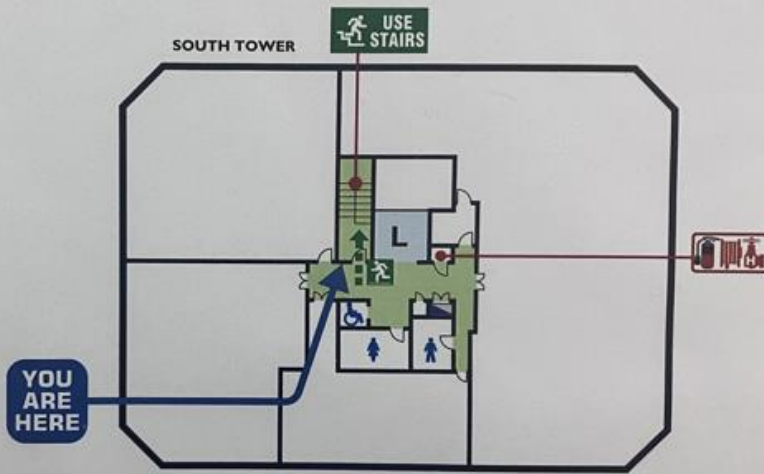
270 Pacific Highway, Crows Nest NSW 2065

**SOUTH TOWER  
GROUND  
FLOOR**

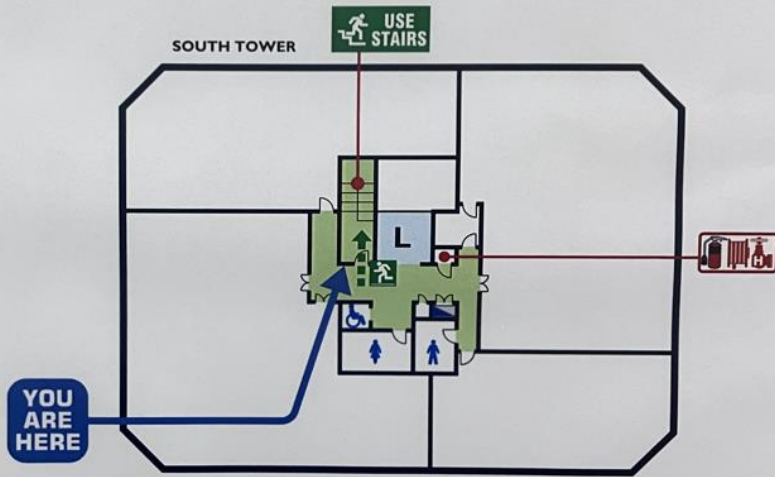


270 Pacific Highway, Crows Nest NSW 2065

**FIRST FLOOR  
SOUTH TOWER**



270 Pacific Highway, Crows Nest NSW 2065

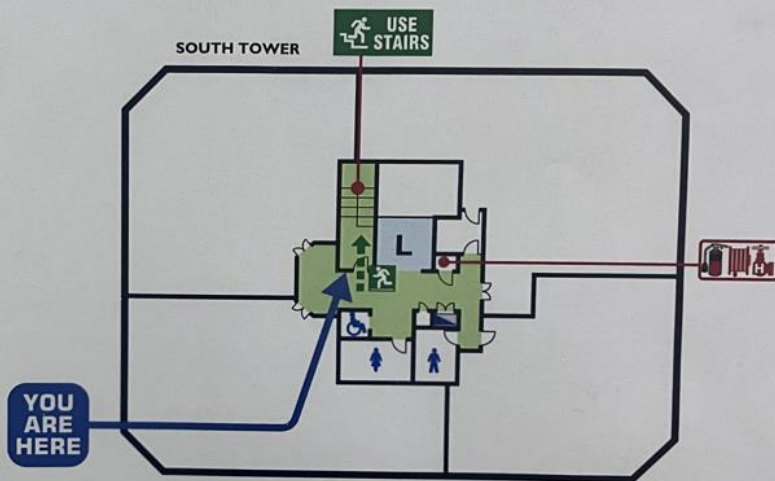


**SECOND FLOOR  
SOUTH TOWER**

**LEGEND**

- |                   |               |                |               |                               |
|-------------------|---------------|----------------|---------------|-------------------------------|
| FIRE EXTINGUISHER | FIRE HYDRANT  | PATH OF TRAVEL | MALE TOILET   | DISABLED TOILET               |
| FIRE HOSE REEL    | ASSEMBLY AREA | EGRESS ROUTE   | FEMALE TOILET | ELECTRICAL DISTRIBUTION BOARD |

270 Pacific Highway, Crows Nest NSW 2065



**THIRD FLOOR  
SOUTH TOWER**

**LEGEND**

- |                   |               |                |               |                               |
|-------------------|---------------|----------------|---------------|-------------------------------|
| FIRE EXTINGUISHER | FIRE HYDRANT  | PATH OF TRAVEL | MALE TOILET   | DISABLED TOILET               |
| FIRE HOSE REEL    | ASSEMBLY AREA | EGRESS ROUTE   | FEMALE TOILET | ELECTRICAL DISTRIBUTION BOARD |

270 Pacific Highway, Crows Nest NSW 2065



**FOURTH FLOOR  
SOUTH TOWER**

**LEGEND**

- |   |   |  |  |   |
|---|---|--|--|---|
|  FIRE EXTINGUISHER |  FIRE HYDRANT  |  PATH OF TRAVEL |  MALE TOILET    |  ELECTRICAL DISTRIBUTION BOARD |
|  FIRE HOSE REEL    |  ASSEMBLY AREA |  EGRESS ROUTE  |  FEMALE TOILET |   |



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## **Appendix B**

HAZMAT Register

RESULTS - ASBESTOS

Building	Level / Area	Material Location	Material Type	Sample No.	Material Status	Asbestos Risk Assessment								Photo No.	Summary Comment/Recommendation	
						Friability	Condition	Treatment	Accessibility	Activity	Ventilation	Risk Score	Action Priority			
North and South Tower	building in general	air conditioning duct work at re-heat elements	duct insulation	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	31, 32	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
North and South Tower	Level 5, open rooftop area	throughout	materials in general	N/A	limited access	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	42, 43	Access limited due to work at height requirements and risk of fall. Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
North and South Tower	Level 5, Plant Room	various electrical cabinets	internal components (e.g. backing boards)	N/A	inaccessible	N/A	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.
North and South Tower	Level 5, Plant Room	boiler unit(s)	bulk insulation	N/A	inaccessible	N/A	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.
North and South Tower	Level 5, Lift Motor Room	lift plant	internal components (e.g. friction pads)	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	48	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
North and South Tower	Level 5, Lift Motor Room	electrical panels	internal components (e.g. backing boards)	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	49	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
North and South Tower	Level 5, Lift Motor Room	fire door (circa 2000's)	insulation	N/A	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	50	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
North Tower	exterior, western end	base of wall, expansion gap	fibrous board	NT-EXT-A01	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3	No asbestos identified.
North Tower	exterior, western end	wall	infill panel	NA	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4	No asbestos identified.

RESULTS - ASBESTOS

Building	Level / Area	Material Location	Material Type	Sample No.	Material Status	Asbestos Risk Assessment								Photo No.	Summary Comment/Recommendation
						Friability	Condition	Treatment	Accessibility	Activity	Ventilation	Risk Score	Action Priority		
North Tower	rooftop plant room	floor surface	sealant / mastic	NT-A01	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6	No asbestos identified.
North Tower	rooftop	exposed waterproof lining	fibrous membrane	NT-A02	no asbestos detected by analysis (SMF detected)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7	No asbestos identified.
North Tower	rooftop	plant/transmission rooms and other areas generally	materials in general	NA	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8	Inaccessible area/material (radiation hazards and risk of fall etc) - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
North Tower	level 4, lobby	Comms and EDB cupboards	materials in general	NA	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	NA	NA	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
North Tower	level 4, kitchen	wall lining	fibre cement sheeting	NT-A03	no asbestos detected by analysis (SMF detected)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9	No asbestos identified.
North Tower	level 4, kitchen	floor (at base of wall)	cement like material	NT-A04	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	NA	No asbestos identified.
North Tower	Ground Level to Level 4, toilets	below ceramic tiled walls and floors	substrate	NA	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
North Tower	level 3, lobby	EDB cupboard door lining	fibre cement sheeting	NT-A05	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12	No asbestos identified.
North Tower	level 3, lobby	Comms cupboard door lining	fibre cement sheeting	NT-A06	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13	No asbestos identified.

RESULTS - ASBESTOS

Building	Level / Area	Material Location	Material Type	Sample No.	Material Status	Asbestos Risk Assessment								Photo No.	Summary Comment/Recommendation
						Friability	Condition	Treatment	Accessibility	Activity	Ventilation	Risk Score	Action Priority		
North Tower	level 3, kitchen	wall lining	fibre cement sheeting	NT-A07	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	similar to 9	No asbestos identified.
North Tower	unit 304	ceiling cavity, duct work	sealant / mastic	NT-A13	no asbestos detected by analysis (SMF detected)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	14	No asbestos identified.
North Tower	level 2, lobby	EDB cupboard door lining	fibre cement	NT-A08	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	similar to 12	No asbestos identified.
North Tower	level 2, lobby	EDB cupboard door lining	mastic / adhesive	NT-A09	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	NA	No asbestos identified.
North Tower	level 2, lobby	Comms cupboard, door lining	fibre cement sheeting	NT-A10	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	similar to 13	No asbestos identified.
North Tower	Unit 204	plant room	wall, insulation	NT-A11	no asbestos detected by analysis ( <b>SMF detected</b> )	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	NA	No asbestos identified.
North Tower	level 1, lobby	EDB cupboard, door lining	fibre cement sheeting	NT-A12	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	similar to 12	No asbestos identified.
North Tower	level 1, lobby	Comms cupboard door lining	fibre cement sheeting	similar to NT-A10	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	similar to 13	Suspected non-asbestos. Consider conducting confirmatory sampling and analysis for asbestos prior to disturbance.
North Tower	ground level	EDB cupboard door lining	fibre cement sheeting	NT-EDB-A01	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	similar to 12	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.

RESULTS - ASBESTOS

Building	Level / Area	Material Location	Material Type	Sample No.	Material Status	Asbestos Risk Assessment								Photo No.	Summary Comment/Recommendation
						Friability	Condition	Treatment	Accessibility	Activity	Ventilation	Risk Score	Action Priority		
North Tower	tenanted offices / retail shops	throughout	materials in general	NA	limited access, suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	15, 16	Limited access - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	exterior, Ground Level to Level 1	open roof top areas (northeast and southwest)	waterproofing membranes	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	33	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Level 1, Unit 102	service riser, pipe clamp	lining	ST-102-A1	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.
South Tower	Level 3, lift foyer	Comms cupboard	fibre cement linings	ST-HALL3-A2	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	34	No asbestos identified.
South Tower	Levels 1, 2 and 4, lift foyer	Comms cupboard	fibre cement linings	refer ST-HALL3-A2	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Level 4, lift foyer	EDB cupboard, doors	fibre cement linings	ST-HALL-A1	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	35	No asbestos identified.
South Tower	Level 3, lift foyer	EDB cupboard, doors	fibre cement linings	ST-HALL3-A1	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	36	No asbestos identified.
South Tower	Ground Level, Level 1 and Level 2, lift foyers	EDB cupboards, doors	suspected fibre cement linings	refer ST-HALL-A1 and ST-HALL3-A1	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Levels 1 to 4, lift foyer	EDB cupboard, electrical cabinets	internal components	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	37	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.

RESULTS - ASBESTOS

Building	Level / Area	Material Location	Material Type	Sample No.	Material Status	Asbestos Risk Assessment								Photo No.	Summary Comment/Recommendation	
						Friability	Condition	Treatment	Accessibility	Activity	Ventilation	Risk Score	Action Priority			
South Tower	lift foyers generally	floor (below exposed floor coverings)	substrate	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	38	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	fire stairs and tunnels generally	fire doors c. 2000's (e.g. typically "Tyco" or "DEM" brand)	insulation	N/A	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	39	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Levels in general, lift foyers	amenities generally, below ceramic floor and wall tiles	substrate	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	40, 41	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Level 5, Plant Room	"DEM" fire door (circa 2000's)	insulation	N/A	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	44	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Level 5, Plant Room	pumping plant, pipework	gasket	ST-PL-A1	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	47	No asbestos identified.
South Tower	Level 5, Plant Room	pumping plant, pipework	gasket	ST-PL-A2	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	47	No asbestos identified.
South Tower	Ground Level, lift foyer	internal entrance to Unit 2, "Shield" fire door (c. 1995)	insulation	N/A	<b>suspected asbestos</b>	3	1	0	1	2	1	8	Low	51	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.	
South Tower	Ground Level	emergency exit from Unit 1 (adjacent main stairwell), fire door	insulation	N/A	<b>suspected asbestos</b>	3	1	0	1	2	1	8	Low	N/A	Inaccessible area/material (door potentially alarmed)- asbestos suspected to be present as a precaution. Confirm status of asbestos material(s) when safe access available and prior to any disturbance.	

RESULTS - ASBESTOS

Building	Level / Area	Material Location	Material Type	Sample No.	Material Status	Asbestos Risk Assessment								Photo No.	Summary Comment/Recommendation	
						Friability	Condition	Treatment	Accessibility	Activity	Ventilation	Risk Score	Action Priority			
South Tower	Ground Level	mailroom corridor, underside of sink unit	bituminous lining	ST-G-A01	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No asbestos identified.
South Tower	Ground Level	mailroom corridor, boiling water unit	insulation	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	52	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.	
South Tower	Ground Level	mailroom corridor, disabled toilet, below ceramic tiles	substrate	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	53	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.	
South Tower	Ground Level	toilets accessed from exterior south, below ceramic tile surfaces	substrate	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.	
South Tower	Ground Level	small plant room accessed from exterior south	materials in general	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material (no keys available) - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.	
South Tower	Ground Level, Unit 1	plant room, electrical panels	internal components	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.	
South Tower	Ground Level, Unit 1	rear (southern) amenities areas, portion wall linings	fibre cement sheeting	N/A	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Rooms appear recently refurbished and tenancy occupied - Confirm status of asbestos material(s) when safe access available and prior to any disturbance.	
South Tower	Ground Level, Unit 1	loading bay (via roller door)	electrical backing board	N/A	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.	

RESULTS - ASBESTOS

Building	Level / Area	Material Location	Material Type	Sample No.	Material Status	Asbestos Risk Assessment								Photo No.	Summary Comment/Recommendation	
						Friability	Condition	Treatment	Accessibility	Activity	Ventilation	Risk Score	Action Priority			
South Tower	Ground Level, Unit 1	loading bay (via roller door), electrical panels	internal components	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Ground Level, Unit 4	electrical room adjacent southeast, electrical panels	electrical backing boards	N/A	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Suspected non-asbestos. Consider conducting confirmatory sampling and analysis for asbestos prior to disturbance.
South Tower	Ground Level, Unit 4	electrical room adjacent southeast, walls (below ceramic tiles)	substrate	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Ground Level, Unit 4	bathroom and shower areas, walls and floor (below ceramic tiles)	substrate	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Ground Level	exterior south, electrical substation	internal components	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Levels 1 to 4	air-conditioning plant rooms (e.g. in unit 401), electrical panels	internal components	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Levels and units generally	floor (below carpets and other floor coverings)	substrate	N/A	access limited	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Asbestos not identified in selected, readily accessible locations however access was limited due to occupation, fixtures, furnishings and storage etc. Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Units 204, 402	throughout	materials in general	N/A	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Inaccessible area/material (no keys or tenant available) - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
North and South Tower	basement car park	storage rooms (northeast and southeast)	materials in general	NA	inaccessible	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	24	N/A	Inaccessible area/material - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.

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RESULTS - ASBESTOS

Building	Level / Area	Material Location	Material Type	Sample No.	Material Status	Asbestos Risk Assessment								Photo No.	Summary Comment/Recommendation
						Friability	Condition	Treatment	Accessibility	Activity	Ventilation	Risk Score	Action Priority		
North and South Tower	basement car park, southern end	air handling duct work, duct joint	mastic	B-A01	no asbestos detected by analysis	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	27	No asbestos identified. Caution advised due to limited sampling and analysis and potential for variation in materials throughout the building.
North and South Tower	basement car park, southern end	wall, expansion gap	lining	B-A02	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.
North and South Tower	basement car park	services room (centre of basement)	materials in general	NA	limited access, suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	29	Limited access - Confirm status of hazardous material(s) when safe access available and prior to any disturbance.
North and South Tower	basement car park	services room (centre of basement)	electric backing board	NA	suspected non-asbestos	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	30	Suspected non-asbestos. Consider conducting confirmatory sampling and analysis for asbestos prior to disturbance.
North and South Tower	building in general	minor portion of fire doors (c. 1990's or earlier)	insulation	N/A	<b>suspected asbestos</b>	3	1	0	1	2	1	8	Low	refer 51	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.

RESULTS - LEAD PAINT SCREENING ASSESSMENT

Building	Level / Area	Material Location	Material Type	Sample / Test No.	Spot Test Result	Analytical Results		Photo No.	Summary Comment/Recommendation
						Analyte	% w/w		
North Tower	exterior	hand rail	white paint	Spot Test 1	negative	N/A	N/A	N/A	Negative spot test result for lead (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.
North Tower	rooftop plant room	hand rail	white paint	Spot Test 2	negative	N/A	N/A	N/A	Negative spot test result for lead (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.
North Tower	rooftop, fire stairs	hand rail	white paint	Spot Test 3	negative	N/A	N/A	17	Negative spot test result for lead (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.
North Tower	rooftop, fire stairs	wall	grey paint	Spot Test 4	negative	N/A	N/A	17	Negative spot test result for lead (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.
North Tower	Level 4	fire door	blue paint	Spot Test 5	negative	N/A	N/A	17	Negative spot test result for lead (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.
North Tower	Ground Level	fire door	blue paint	NT-LP01	N/A	lead	0.04	18	Lead paint not identified. Analysis results non-detect and/or below the threshold concentration criteria for lead paint outlined in AS4361.2 (i.e. $\leq 0.1$ % lead w/w). Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.
South Tower	Level 5, Plant room	doorframe	blue paint	ST-LP1	N/A	lead	<b>0.30</b>	similar 54	Lead paint identified. Analysis results are above the threshold criteria for lead paint outlined in AS4361.2 (i.e. $>0.1$ % lead w/w).  Any areas of damaged/flaking paint and any associated dust/debris should be removed. Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.  Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any lead paint abatement activity.

RESULTS - LEAD PAINT SCREENING ASSESSMENT

Building	Level / Area	Material Location	Material Type	Sample / Test No.	Spot Test Result	Analytical Results		Photo No.	Summary Comment/Recommendation
						Analyte	% w/w		
South Tower	Level 4, stairwell	doorframe	blue paint	ST-LP2	N/A	lead	0.26	similar 54	<p>Lead paint identified. Analysis results are above the threshold criteria for lead paint outlined in AS4361.2 (i.e. &gt;0.1 % lead w/w).</p> <p>Any areas of damaged/flaking paint and any associated dust/debris should be removed.</p> <p>Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any lead paint abatement activity.</p>
South Tower	Level 4, stairwell	metal facing to side of stairs	white paint	ST-LP3	N/A	lead	0.28	similar 55	<p>Lead paint identified. Analysis results are above the threshold criteria for lead paint outlined in AS4361.2 (i.e. &gt;0.1 % lead w/w).</p> <p>Any areas of damaged/flaking paint and any associated dust/debris should be removed.</p> <p>Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any lead paint abatement activity.</p>
South Tower	Level 2, stairwell	metal facing to side of stairs	white paint	ST-LP4	N/A	lead	0.24	similar 55	<p>Lead paint identified. Analysis results are above the threshold criteria for lead paint outlined in AS4361.2 (i.e. &gt;0.1 % lead w/w).</p> <p>Any areas of damaged/flaking paint and any associated dust/debris should be removed.</p> <p>Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any lead paint abatement activity.</p>
South Tower	Level 5, Lift Motor Room	door	paint	ST-LP5	N/A	lead	0.30	N/A	<p>Lead paint identified. Analysis results are above the threshold criteria for lead paint outlined in AS4361.2 (i.e. &gt;0.1 % lead w/w).</p> <p>Any areas of damaged/flaking paint and any associated dust/debris should be removed.</p> <p>Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any lead paint abatement activity.</p>

RESULTS - LEAD PAINT SCREENING ASSESSMENT

Building	Level / Area	Material Location	Material Type	Sample / Test No.	Spot Test Result	Analytical Results		Photo No.	Summary Comment/Recommendation
						Analyte	% w/w		
South Tower	Ground Level, Unit 3	masonry wall	white paint	ST-LP6	N/A	lead	<0.005	N/A	Lead paint not identified. Analysis results non-detect and/or below the threshold concentration criteria for lead paint outlined in AS4361.2 (i.e. ≤0.1 % lead w/w). Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.
South Tower	exterior, southern façade	bollard	yellow paint	ST-LP7	N/A	lead	0.02	N/A	Lead paint not identified. Analysis results non-detect and/or below the threshold concentration criteria for lead paint outlined in AS4361.2 (i.e. ≤0.1 % lead w/w). Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.
South Tower	exterior, southern façade	handrail of stairs to electrical substation	white paint	ST-LP8	N/A	lead	0.02	N/A	Lead paint not identified. Analysis results non-detect and/or below the threshold concentration criteria for lead paint outlined in AS4361.2 (i.e. ≤0.1 % lead w/w). Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.
North and South Tower	throughout building	materials in general	paints in general	refer ST-LP1 to ST-LP5	N/A	N/A	N/A	N/A	<b>May comprise lead paints.</b> Conduct further confirmatory sample analysis and/or testing for lead in paint as necessary, prior to any significant disturbance of paints.  Minimise disturbance of any lead-containing paints and implement controls to prevent exposure and dispersal during any lead paint abatement activity and any building work (e.g. maintenance, refurbishment and demolition).  Classify material for disposal in accordance with the NSW EPA Waste Classification Guidelines and segregate material, if required, for disposal.

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**RESULTS - LEAD IN CEILING CAVITY DUST**

Building	Room / Area	Material Location	Material Type	Sample No.	Result (mg/m <sup>2</sup> )	Material Status	Photo No.	Summary Comment/Recommendation
North Tower	unit 301	ceiling cavity	settled dust / debris	NT-LD01	5.0	<b>elevated lead concentration detected</b>	19	<p>Elevated lead concentration detected. Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.</p> <p>Consider removing lead contamination if reasonably practicable to do so and prior to any substantive disturbance.</p> <p>Implement appropriate controls to prevent exposure and dispersal including during building occupation and any building work (e.g. maintenance, refurbishment and demolition).</p>
North Tower	unit 403	ceiling cavity	settled dust / debris	NT-LD02	5.3	<b>elevated lead concentration detected</b>	similar to 19	<p>Elevated lead concentration detected. Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.</p> <p>Consider removing lead contamination if reasonably practicable to do so and prior to any substantive disturbance.</p> <p>Implement appropriate controls to prevent exposure and dispersal including during building occupation and any building work (e.g. maintenance, refurbishment and demolition).</p>

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RESULTS - LEAD IN CEILING CAVITY DUST

Building	Room / Area	Material Location	Material Type	Sample No.	Result (mg/m <sup>2</sup> )	Material Status	Photo No.	Summary Comment/Recommendation
North Tower	rooms and areas in general	ceiling and similar building cavities in general	settled dust / debris	refer NT-LD01, NT-LD02	N/A	<b>elevated lead concentration suspected</b>	N/A	<p>Elevated lead concentration suspected. Undertake confirmatory sampling and analysis for lead prior to disturbance.</p> <p>Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.</p> <p>Remove lead contamination if reasonably practicable to do so and prior to any substantive disturbance. Implement appropriate controls to prevent exposure and dispersal including during building work (e.g. maintenance, refurbishment and demolition).</p>
South Tower	Ground Level, Unit 2	ceiling cavity	settled dust / debris	ST-G-LD1	<b>2.2</b>	<b>elevated lead concentration detected</b>	N/A	<p>Elevated lead concentration detected. Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.</p> <p>Consider removing lead contamination if reasonably practicable to do so and prior to any substantive disturbance.</p> <p>Implement appropriate controls to prevent exposure and dispersal including during building occupation and any building work (e.g. maintenance, refurbishment and demolition).</p>

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**RESULTS - LEAD IN CEILING CAVITY DUST**

Building	Room / Area	Material Location	Material Type	Sample No.	Result (mg/m <sup>2</sup> )	Material Status	Photo No.	Summary Comment/Recommendation
South Tower	Ground Level, disabled toilet	ceiling cavity	settled dust / debris	ST-G-LD2	13	<b>elevated lead concentration detected</b>	N/A	<p>Elevated lead concentration detected. Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.</p> <p>Consider removing lead contamination if reasonably practicable to do so and prior to any substantive disturbance.</p> <p>Implement appropriate controls to prevent exposure and dispersal including during building occupation and any building work (e.g. maintenance, refurbishment and demolition).</p>
South Tower	Level 1, Unit 103	ceiling cavity	settled dust / debris	ST-103-LD1	2.6	<b>elevated lead concentration detected</b>	N/A	<p>Elevated lead concentration detected. Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.</p> <p>Consider removing lead contamination if reasonably practicable to do so and prior to any substantive disturbance.</p> <p>Implement appropriate controls to prevent exposure and dispersal including during building occupation and any building work (e.g. maintenance, refurbishment and demolition).</p>

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**RESULTS - LEAD IN CEILING CAVITY DUST**

Building	Room / Area	Material Location	Material Type	Sample No.	Result (mg/m <sup>2</sup> )	Material Status	Photo No.	Summary Comment/Recommendation
South Tower	Level 3, Unit 304	ceiling cavity	settled dust / debris	ST-304-LD1	3.0	<b>elevated lead concentration detected</b>	N/A	<p>Elevated lead concentration detected.</p> <p>Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.</p> <p>Consider removing lead contamination if reasonably practicable to do so and prior to any substantive disturbance.</p> <p>Implement appropriate controls to prevent exposure and dispersal including during building occupation and any building work (e.g. maintenance, refurbishment and demolition).</p>
South Tower	rooms and areas in general	ceiling and similar building cavities in general	settled dust / debris	refer ST-G-LD1, ST-G-LD2, ST-103-LD1 and ST-304-LD1	N/A	<b>elevated lead concentration suspected</b>	N/A	<p>Elevated lead concentration suspected.</p> <p>Undertake confirmatory sampling and analysis for lead prior to disturbance.</p> <p>Ensure access to building cavity(s) is adequately restricted and entry is only made under controlled conditions.</p> <p>Remove lead contamination if reasonably practicable to do so and prior to any substantive disturbance.</p> <p>Implement appropriate controls to prevent exposure and dispersal including during building work (e.g. maintenance, refurbishment and demolition).</p>

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

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
North and South Tower	building generally	suspended ceilings	fibrous tiles	N/A	<b>SMF identified visually</b>	N/A	SMF identified. Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal. Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.
North and South Tower	building generally	ceiling cavities	insulation batts	N/A	<b>SMF identified visually</b>	N/A	SMF identified. Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal. Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.

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

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
North and South Tower	building generally	ceiling cavities, plant rooms and other areas	air handling duct work generally	N/A	<b>SMF (suspected)</b>	11	<p>SMF suspected. Conduct further investigation(s) as required to confirm the status of the material prior to any disturbance.</p> <p>Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.</p>
North and South Tower	building generally	accessible service risers	insulation blanket(s)	N/A	<b>SMF identified visually</b>	N/A	<p>SMF identified. Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.</p>

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

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
North and South Tower	building generally	accessible service risers	pipe work, insulation	N/A	<b>SMF identified visually</b>	N/A	<p>SMF identified. Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.</p>
North and South Tower	building generally	framed and sheeted walls	bulk insulation	N/A	<b>SMF (suspected)</b>	N/A	<p>SMF suspected. Conduct further investigation(s) as required to confirm the status of the material prior to any disturbance.</p> <p>Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.</p>

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

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
North and South Tower	Level 5, Plant Room	hot water unit (c.2000)	bulk insulation	N/A	<b>SMF (suspected)</b>	N/A	<p>SMF suspected. Conduct further investigation(s) as required to confirm the status of the material prior to any disturbance.</p> <p>Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.</p>
North and South Tower	Level 5, Plant Room	accessible water pipe work	bulk insulation	N/A	<b>SMF identified visually</b>	56, 57, 58	<p>SMF identified. Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.</p>

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

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
North and South Tower	Level 5, Plant Room and open roof area	sheathed pipes and plant in limited, accessible areas	bulk insulation	N/A	<b>SMF and foam identified visually</b>	5, 59, 60	<p>SMF and foam identified in readily accessible areas however caution is advised due to the limited access available below sheathing and the potential for variation in materials.</p> <p><b>Confirm status of hazardous materials when full access is available and prior to any disturbance.</b></p>
North and South Tower	Levels 1 to 4, AC plant rooms (e.g. in unit 401 and 302/303)	walls, behind perforated metal sheeting	insulation	N/A	<b>SMF (suspected)</b>	N/A	<p>SMF suspected. Conduct further investigation(s) as required to confirm the status of the material prior to any disturbance.</p> <p>Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.</p>

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

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
North Tower	rooftop	exposed waterproof lining	fibrous membrane	NT-A02	<b>SMF detected by analysis</b>	7	SMF identified. Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal. Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.
North Tower	Unit 204	plant room	wall, insulation	NT-A11	SMF detected by analysis	NA	SMF identified. Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal. Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.

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

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
North Tower	rooftop, plant room	water heater	insulation materials	NA	SMF (suspected)	20	<p>SMF suspected. Conduct further investigation(s) as required to confirm the status of the material prior to any disturbance.</p> <p>Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.</p>
North Tower	rooms and areas in general	wall and ceiling cavities	bulk insulation materials	NA	SMF (suspected)	NA	<p>SMF suspected. Conduct further investigation(s) as required to confirm the status of the material prior to any disturbance.</p> <p>Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal.</p> <p>Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.</p>

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

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
South Tower	Level 1, Unit 102	suspended ceiling	tiles	ST-102-A2	<b>SMF detected by analysis</b>	N/A	SMF identified. Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal. Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.
South Tower	Level 5, open rooftop area	roof surface	exposed waterproofing membrane	ST-PL-A3	<b>SMF detected by analysis</b>	61	SMF identified. Classify material for disposal in accordance with legislative requirements and the NSW EPA Waste Classification Guidelines. Segregate material, if required, for disposal. Minimise disturbance and implement controls to, where required, to prevent exposure and dispersal during building occupation, building work (e.g. maintenance, refurbishment and demolition) and any SMF abatement activity.

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**RESULTS - POLYCHLORINATED BIPHENYLS (PCBs)**

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
North Tower	rooftop plant room	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	21	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
North Tower	unit 401	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	22	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
North Tower	ground level, fire exit corridor	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	25	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
North Tower	exterior, western façade	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	26	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
South Tower	Unit 102, 103, 104, 202, 203, 301, 302, 303	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	nil PCB (suspected)	N/A	Inaccessible area/material. Nil PCB containing capacitors suspected based on apparent age of building construction (1980's onwards). As a precaution, confirm status of hazardous material(s) when safe access available and prior to any disturbance.

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**RESULTS - POLYCHLORINATED BIPHENYLS (PCBs)**

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
South Tower	Units G01, 101, 201, 401, 403(?) generally	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	N/A	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
South Tower	Unit 401, air-conditioning plant room	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	N/A	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
South Tower	emergency exit stairwell and corridors generally	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	nil PCB (suspected)	N/A	Inaccessible area/material. Nil PCB containing capacitors suspected based on apparent age of building construction (1980's onwards). As a precaution, confirm status of hazardous material(s) when safe access available and prior to any disturbance.
South Tower	Level 3, lift foyer, Comms cupboard	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	N/A	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.

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**RESULTS - POLYCHLORINATED BIPHENYLS (PCBs)**

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
South Tower	Level 3, Unit 304	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	N/A	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
South Tower	Level 5, Plant Room	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	62	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
South Tower	Level 5, Lift Motor Room	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	63	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
South Tower	Ground Level, Unit 4, electrical room adjacent southeast	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	N/A	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.

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**RESULTS - POLYCHLORINATED BIPHENYLS (PCBs)**

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
South Tower	Ground Level, exterior façade	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	64, 65	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
South Tower	Ground Level, mailroom corridor, disabled toilet	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	N/A	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
South Tower	Ground Floor, Unit 1, plant room	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	N/A	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
South Tower	Ground Floor, Unit 1, loading bay (via roller door)	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	N/A	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.

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**RESULTS - POLYCHLORINATED BIPHENYLS (PCBs)**

Building	Room / Area	Material Location	Material Type	Sample No.	Material Status	Photo No.	Summary Comment/Recommendation
North and South Tower	Basement	fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	23, 66	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.
North and South Tower	rooms and areas in general	portion of fluorescent light fittings	internal components (e.g. capacitors and ballasts)	N/A	<b>PCB (suspected)</b>	N/A	Inaccessible area/material. Internal components suspected to contain PCB as a precaution. Confirm presence/absence of PCB by further inspection and/or sampling and analysis when safe access is available and prior to any disturbance.



Photograph 3: North Tower, exterior, western end, base of wall, expansion gap, fibrous board, no asbestos detected by analysis.



Photograph 4: North Tower, exterior, western end, infill panel, suspected non-asbestos.

 <b>Douglas</b> PARTNERS <span style="margin-left: 20px;">GROUNDED EXPERTISE</span>	<b>Site Photographs</b>		PROJECT: 214296.04
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Photograph 5: North and South Tower, Level 5, Plant Room, sheathed pipes and plant, bulk insulation, SMF and foam identified visually.



Photograph 6: North Tower, rooftop plant room, floor surface, sealant / mastic, no asbestos detected by analysis.

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Photograph 7: North Tower, rooftop, exposed waterproof lining, fibrous membrane, no asbestos detected by analysis (SMF detected).



Photograph 8: North Tower, rooftop, plant/transmission rooms and other areas generally, materials in general, inaccessible.

 <b>Douglas</b> PARTNERS <span style="margin-left: 20px;">GROUNDED EXPERTISE</span>	<b>Site Photographs</b>	PROJECT: 214296.04
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Photograph 9: North Tower, level 4, kitchen, wall lining, fibre cement, no asbestos detected by analysis (SMF detected).



Photograph 10: North Tower, level 4, toilets, below ceramic tiled walls and floors, substrate, inaccessible.

 <b>Douglas</b> PARTNERS <span style="margin-left: 20px;">GROUNDED EXPERTISE</span>	<b>Site Photographs</b>		PROJECT: 214296.04
	<b>HAZMAT Survey</b>		PLATE No: 5
	<b>270-272 Pacific Highway</b>		REV: A
	CLIENT: Silvernight		DATE: Jul-25

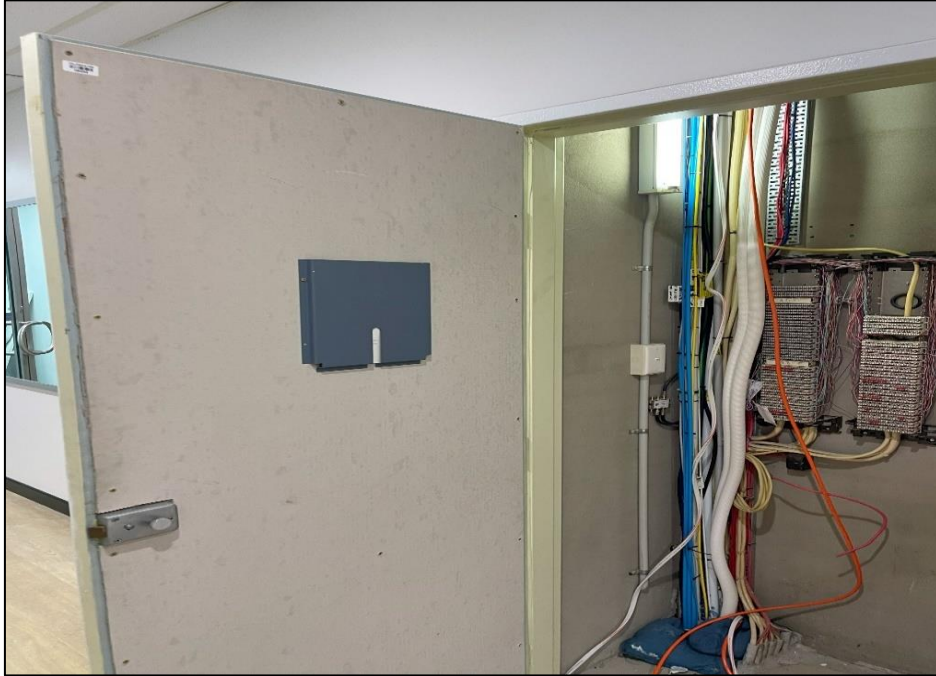


Photograph 11: North and South Tower, building generally, plant room, air handling duct work generally, SMF (suspected).

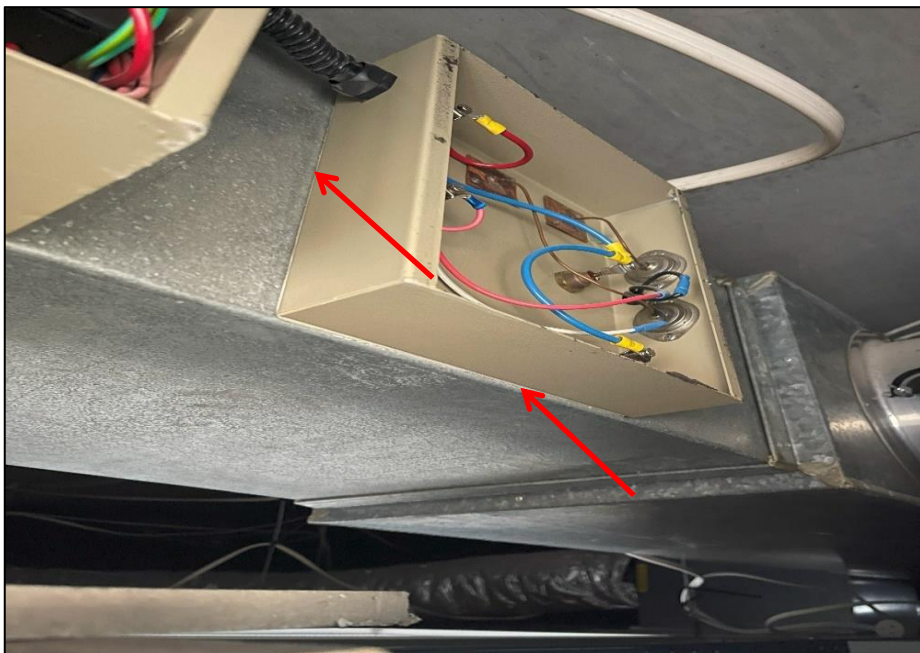


Photograph 12: North Tower, level 3, lobby, EDB cupboard door lining, fibre cement sheeting, no asbestos detected by analysis.

 <b>Douglas</b> PARTNERS <span style="margin-left: 20px;">GROUNDED EXPERTISE</span>	<b>Site Photographs</b>	PROJECT: 214296.04
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Photograph 13: North Tower, level 3, lobby, Comms cupboard door lining, fibre cement sheeting, no asbestos detected by analysis.



Photograph 14: North Tower, unit 304, ceiling cavity, duct work, sealant / mastic, no asbestos detected by analysis (SMF detected).

 <b>Douglas</b> PARTNERS GROUNDED EXPERTISE	<b>Site Photographs</b>	PROJECT: 214296.04
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Photograph 15: North Tower, tenanted offices / retail shops, throughout, materials in general, limited access, suspected non-asbestos.



Photograph 16: North Tower, tenanted offices / retail shops, throughout, materials in general, limited access, suspected non-asbestos.



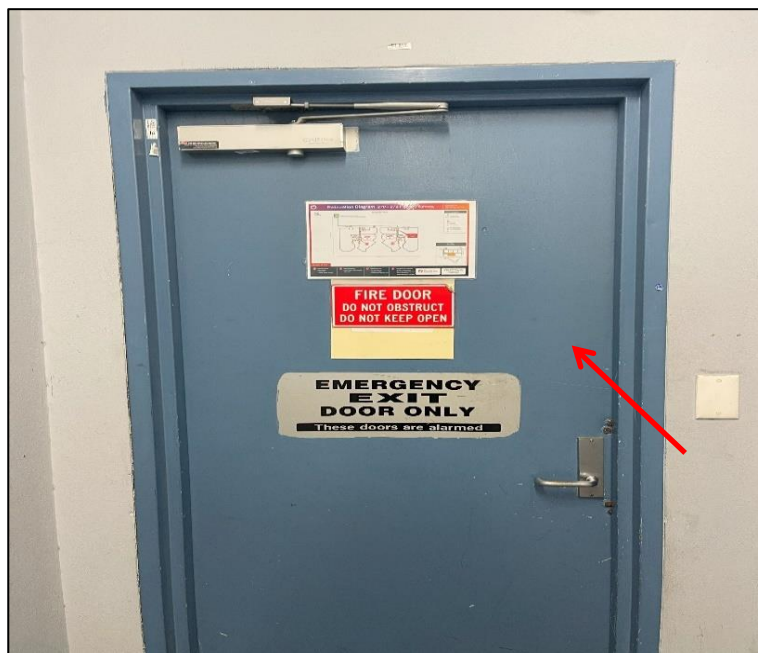
**Site Photographs**  
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Photograph 17: North Tower, rooftop, fire stairs, white paint to hand rail, blue paint to door and grey paint to wall, negative spot tests.



Photograph 18: North Tower, ground level, fire door, blue paint.



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Photograph 19: North Tower, unit 301, ceiling cavity, settled dust / debris, elevated lead concentration detected.

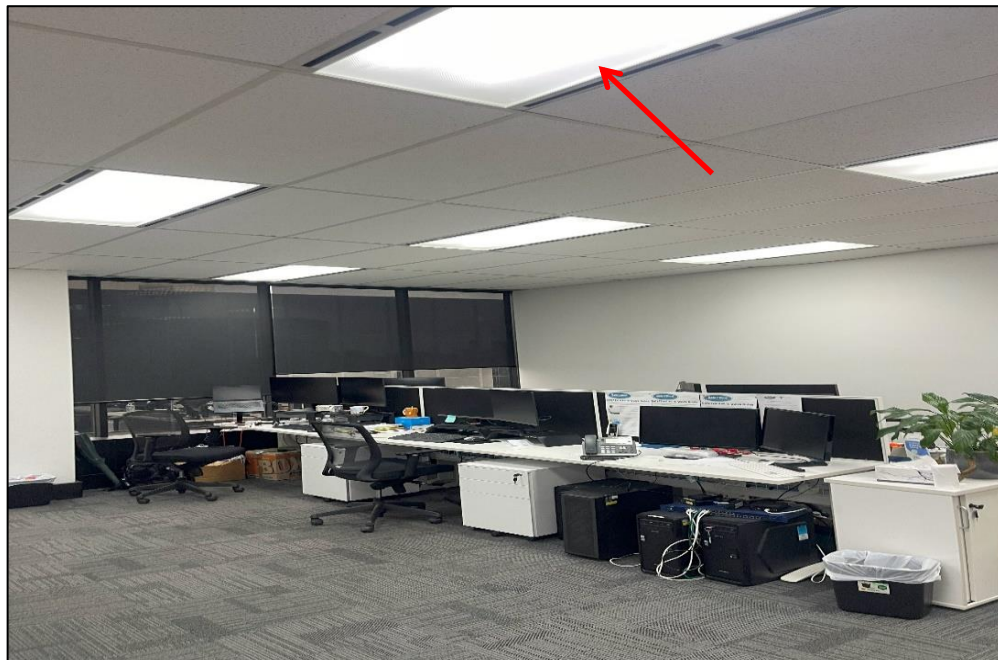


Photograph 20: North Tower, rooftop, plant room, water heater, insulation materials, SMF (suspected).

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Photograph 21: North Tower, rooftop plant room, fluorescent light fittings, internal components, PCB (suspected).



Photograph 22: North Tower, unit 401, fluorescent light fittings, internal components, PCB (suspected).



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Photograph 23: Basement car park, fluorescent light fittings, internal components, PCB (suspected).



Photograph 24: 270-272 Pacific Highway, basement car park, storage rooms, materials in general, inaccessible.

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Photograph 25: North Tower, ground level, fire exit corridor, fluorescent light fittings, internal components, PCB (suspected).



Photograph 26: North Tower, exterior, western façade, fluorescent light fittings, internal components, PCB (suspected).

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Photograph 27: Basement car park, southern end, air handling duct work, duct joint, mastic, no asbestos detected by analysis.



Photograph 28: Basement car park, southern end, wall, expansion gap, lining, no asbestos detected by analysis.

 <b>Douglas</b> PARTNERS	GROUNDED EXPERTISE	<b>Site Photographs</b>		PROJECT: 214296.04
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Photograph 29: Basement car park, services room, materials in general, limited access, suspected non-asbestos.

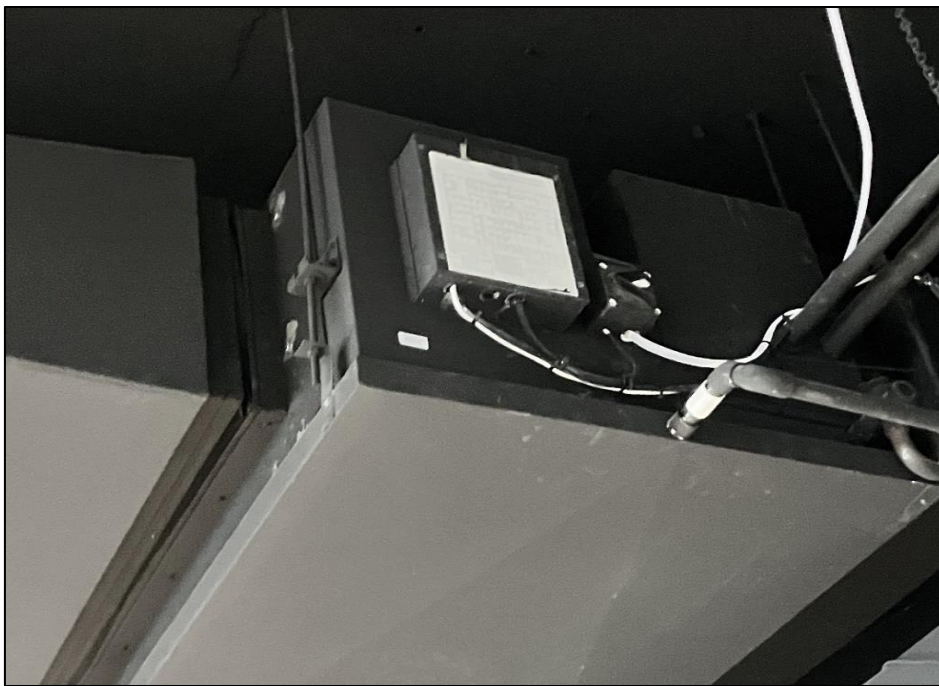


Photograph 30: Basement car park, services room, electric backing board, suspected non-asbestos.

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Photograph 31: South Tower, building in general, air conditioning duct work at re-heat elements, duct insulation, inaccessible.



Photograph 32: South Tower, building in general, air conditioning duct work at re-heat elements, duct insulation, inaccessible.



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Photograph 33: South Tower, exterior, Ground Level to Level 1, open roof top areas (northeast and southwest), waterproofing membranes, inaccessible.



Photograph 34: South Tower, Level 3, lift foyer, Comms cupboard, fibre cement linings, no asbestos detected by analysis.

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Photograph 35: South Tower, Level 4, lift foyer, EDB cupboard, doors, fibre cement linings, no asbestos detected by analysis.



Photograph 36: South Tower, Level 3, lift foyer, EDB cupboard, doors, fibre cement linings, no asbestos detected by analysis.



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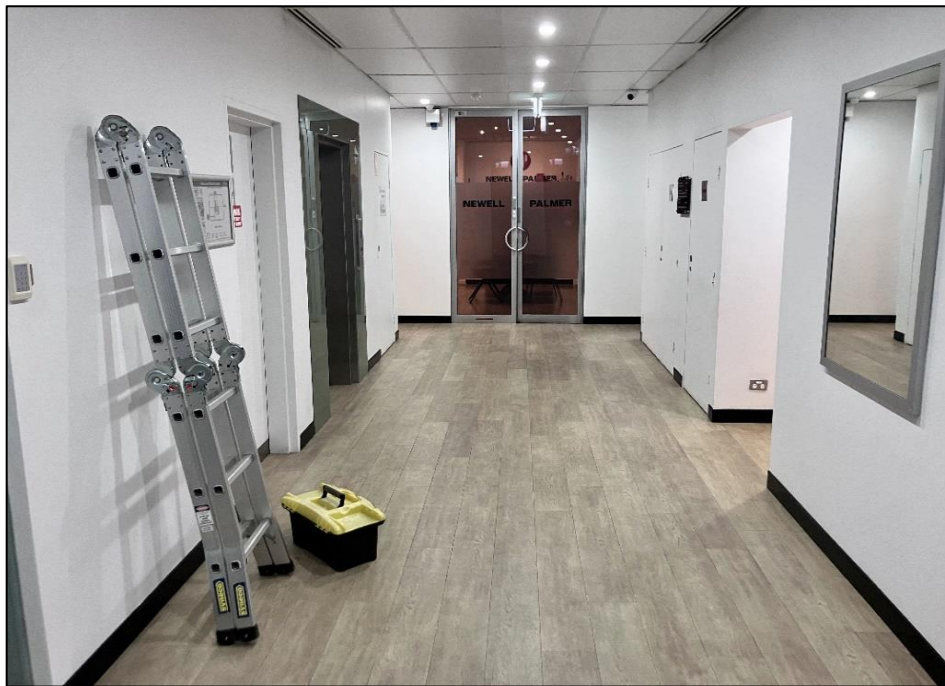
PLATE No: 18

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Photograph 37: South Tower, Levels 1 to 4, lift foyer, EDB cupboard, electrical cabinets, internal components, inaccessible.



Photograph 38: South Tower, lift foyers generally, floor (below exposed floor coverings), substrate, inaccessible.



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Photograph 39: South Tower, fire stairs and tunnels generally, fire doors c. 2000's (e.g. typically "Tyco" or "DEM" brand) , insulation, suspected non-asbestos.



Photograph 40: South Tower, Levels in general, lift foyers, amenities generally, below ceramic floor and wall tiles, substrate, inaccessible.

 <b>Douglas</b> PARTNERS	GROUNDED EXPERTISE	<b>Site Photographs</b>	PROJECT: 214296.04
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Photograph 41: South Tower, Levels in general, lift foyers, amenities generally, below ceramic floor and wall tiles, substrate, inaccessible.

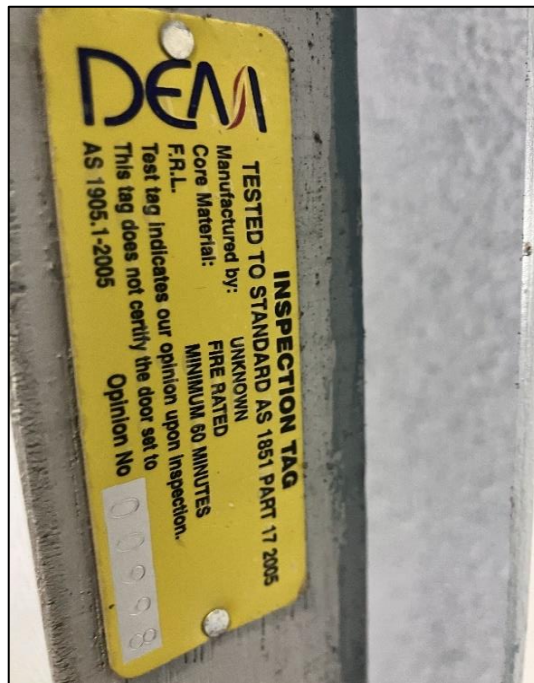


Photograph 42: South Tower, Level 5, open rooftop area, throughout, materials in general, limited access.

 <b>Douglas</b> PARTNERS <span style="margin-left: 20px;">GROUNDED EXPERTISE</span>	<b>Site Photographs</b>	PROJECT: 214296.04
	<b>HAZMAT Survey</b>	PLATE No: 21
	<b>270-272 Pacific Highway</b>	REV: A
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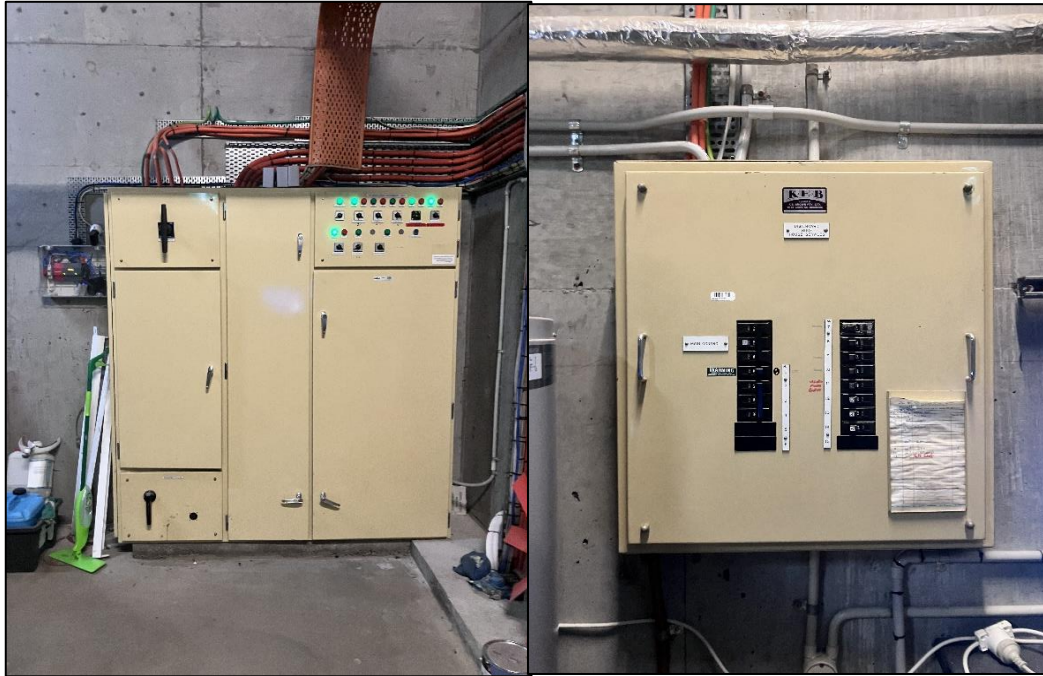


Photograph 43: South Tower, Level 5, open rooftop area, throughout, materials in general, limited access.



Photograph 44: South Tower, Level 5, Plant Room, "DEM" fire door (circa 2000's), insulation, suspected non-asbestos.

 GROUND EXPERTISE	<b>Site Photographs</b>	PROJECT: 214296.04
	<b>HAZMAT Survey</b>	PLATE No: 22
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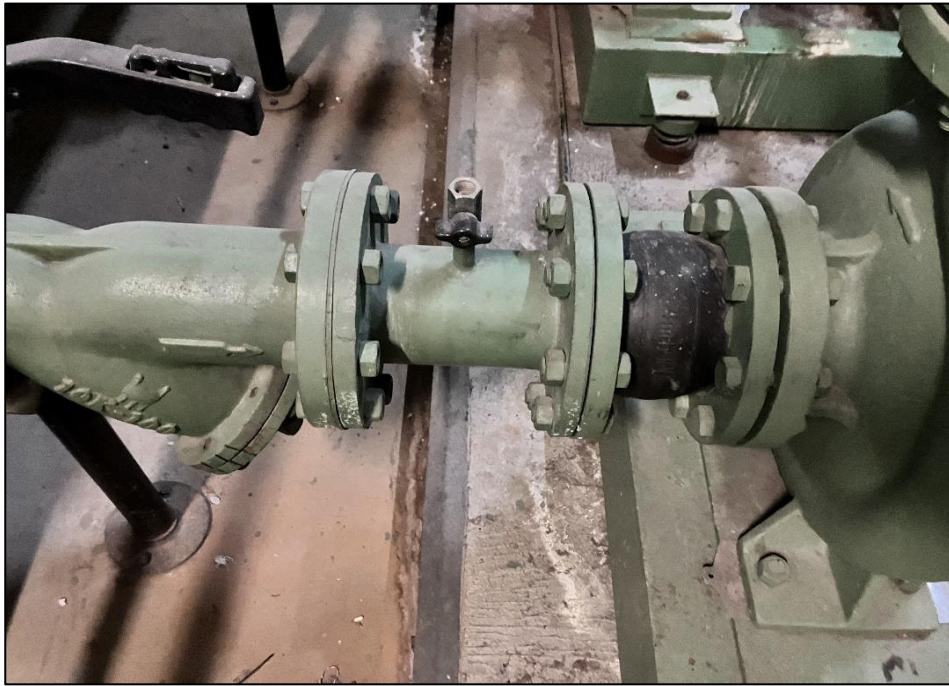


Photograph 45: South Tower, Level 5, Plant Room, various electrical cabinets, internal components (e.g. backing boards), inaccessible.



Photograph 46: South Tower, Level 5, Plant Room, boiler unit(s), bulk insulation, inaccessible.

 <b>Douglas</b> PARTNERS GROUNDED EXPERTISE	<b>Site Photographs</b>	PROJECT: 214296.04
	<b>HAZMAT Survey</b>	PLATE No: 23
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Photograph 47: South Tower, Level 5, Plant Room, pumping plant, pipework, gasket, no asbestos detected by analysis.



Photograph 48: South Tower, Level 5, Lift Motor Room, lift plant, internal components (e.g. friction pads), inaccessible.

 <b>Douglas</b> PARTNERS <span style="margin-left: 20px;">GROUNDED EXPERTISE</span>	<b>Site Photographs</b>	PROJECT: 214296.04
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Photograph 49: South Tower, Level 5, Lift Motor Room, electrical panels, internal components (e.g. backing boards), inaccessible.



Photograph 50: South Tower, Level 5, Lift Motor Room, "Tyco" fire door (circa 2000's), insulation, suspected non-asbestos.

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	<b>HAZMAT Survey</b>	PLATE No: 25
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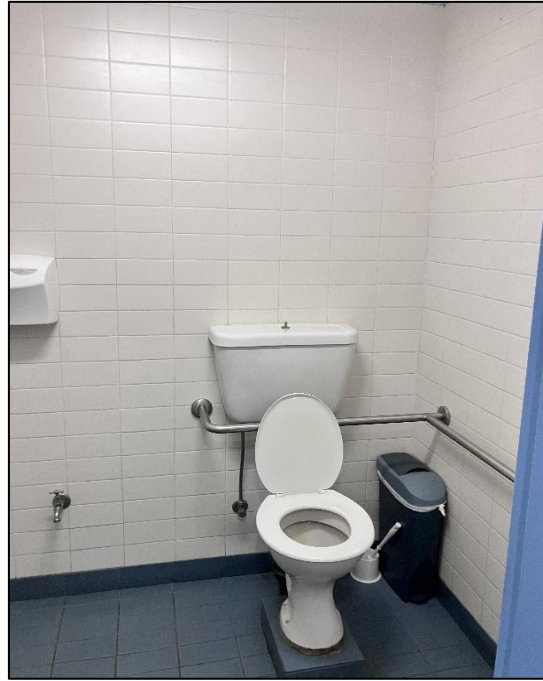


Photograph 51: South Tower, Ground Level, lift foyer, internal entrance to Unit 2, "Shield" fire door (c. 1995), insulation, suspected asbestos.



Photograph 52: South Tower, Ground Level, mailroom corridor, boiling water unit, insulation, inaccessible.

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Photograph 53: South Tower, Ground Level, mailroom corridor, disabled toilet, below ceramic tiles, substrate, inaccessible.



Photograph 54: South Tower, main stairwell, typical doorframe, blue paint.



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Photograph 55: South Tower, main stairwell, metal facing to stairs, white paint.



Photograph 56: South Tower, Level 5, Plant Room, accessible water pipe work, bulk insulation, SMF identified visually.

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	<b>HAZMAT Survey</b>	PLATE No: 28
	<b>270-272 Pacific Highway</b>	REV: A
	CLIENT: Silvernight	DATE: Jul-25



Photograph 57: South Tower, Level 5, Plant Room, accessible water pipe work, bulk insulation, SMF identified visually.



Photograph 58: South Tower, Level 5, Plant Room, accessible water pipe work, bulk insulation, SMF identified visually.

 <b>Douglas</b> PARTNERS <span style="margin-left: 20px;">GROUNDED EXPERTISE</span>	<b>Site Photographs</b>		PROJECT: 214296.04
	<b>HAZMAT Survey</b>		PLATE No: 29
	<b>270-272 Pacific Highway</b>		REV: A
	CLIENT: Silvernight		DATE: Jul-25



Photograph 59: South Tower, Level 5, Plant Room and open roof area, sheathed pipes and plant, bulk insulation, SMF and foam identified visually.



Photograph 60: South Tower, Level 5, Plant Room and open roof area, sheathed pipes and plant, bulk insulation, SMF and foam identified visually.

 <b>Douglas</b> PARTNERS <span style="margin-left: 20px;">GROUNDED EXPERTISE</span>	<b>Site Photographs</b>	PROJECT: 214296.04
	<b>HAZMAT Survey</b>	PLATE No: 30
	<b>270-272 Pacific Highway</b>	REV: A
	CLIENT: Silvernights	DATE: Jul-25



Photograph 61: South Tower, Level 5, open rooftop area, roof surface, exposed waterproofing membrane, SMF detected by analysis.



Photograph 62: South Tower, Level 5, Plant Room, fluorescent light fittings, internal components, PCB (suspected).

 <b>Douglas</b> PARTNERS <span style="margin-left: 20px;">GROUNDED EXPERTISE</span>	<b>Site Photographs</b>		PROJECT: 214296.04
	<b>HAZMAT Survey</b>		PLATE No: 31
	<b>270-272 Pacific Highway</b>		REV: A
	CLIENT: Silvernight		DATE: Jul-25



Photograph 63: South Tower, Level 5, Lift Motor Room, fluorescent light fittings, internal components, PCB (suspected).



Photograph 64: South Tower, Ground Level, exterior façade, fluorescent light fittings, internal components, PCB (suspected).

 GROUND EXPERTISE	<b>Site Photographs</b>	PROJECT: 214296.04
	<b>HAZMAT Survey</b>	PLATE No: 32
	<b>270-272 Pacific Highway</b>	REV: A
	CLIENT: Silvernight	DATE: Jul-25



Photograph 65: South Tower, Ground Level, exterior façade, fluorescent light fittings, internal components, PCB (suspected).



Photograph 66: South Tower, Basement, fluorescent light fittings, internal components, PCB (suspected).

 <b>Douglas</b> PARTNERS <span style="margin-left: 20px;">GROUNDED EXPERTISE</span>	<b>Site Photographs</b>		PROJECT: 214296.04
	<b>HAZMAT Survey</b>		PLATE No: 33
	<b>270-272 Pacific Highway</b>		REV: A
	CLIENT: Silvernight		DATE: Jul-25

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## **Appendix C**

Laboratory Certificate(s) of Analysis



## **CERTIFICATE OF ANALYSIS 385198**

### **Client Details**

<b>Client</b>	Douglas Partners Pty Ltd
<b>Attention</b>	Tim Kulmar
<b>Address</b>	96 Hermitage Rd, West Ryde, NSW, 2114

### **Sample Details**

<b>Your Reference</b>	<b>214296.04, Crows Nest</b>
<b>Number of Samples</b>	9 Paint, 6 Swab, 26 Material
<b>Date samples received</b>	07/07/2025
<b>Date completed instructions received</b>	07/07/2025

### **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.  
**Please refer to the last page of this report for any comments relating to the results.**

### **Report Details**

<b>Date results requested by</b>	10/07/2025
<b>Date of Issue</b>	10/07/2025
NATA Accreditation Number 2901. This document shall not be reproduced except in full.	
Accredited for compliance with ISO/IEC 17025 - Testing. <b>Tests not covered by NATA are denoted with *</b>	

#### **Asbestos Approved By**

Analysed by Asbestos Approved Analyst: Lucy Zhu  
Authorised by Asbestos Approved Signatory: Lucy Zhu

#### **Results Approved By**

Lucy Zhu, Asbestos Supervisor  
Tabitha Roberts, Senior Chemist

#### **Authorised By**

Nancy Zhang, Laboratory Manager

Client Reference: 214296.04, Crows Nest

Lead in Paint						
Our Reference		385198-1	385198-20	385198-21	385198-22	385198-23
Your Reference	UNITS	NT-LP01	ST-LP1	ST-LP2	ST-LP3	ST-LP4
Date Sampled		30/06/2025	30/06/2025	30/06/2025	30/06/2025	30/06/2025
Type of sample		Paint	Paint	Paint	Paint	Paint
Date prepared	-	09/07/2025	09/07/2025	09/07/2025	09/07/2025	09/07/2025
Date analysed	-	09/07/2025	09/07/2025	09/07/2025	09/07/2025	09/07/2025
Lead in paint	%w/w	0.04	0.30	0.26	0.28	0.24

Lead in Paint					
Our Reference		385198-24	385198-25	385198-26	385198-27
Your Reference	UNITS	ST-LP5	ST-LP6	ST-LP7	ST-LP8
Date Sampled		30/06/2025	30/06/2025	30/06/2025	30/06/2025
Type of sample		Paint	Paint	Paint	Paint
Date prepared	-	09/07/2025	09/07/2025	09/07/2025	09/07/2025
Date analysed	-	09/07/2025	09/07/2025	09/07/2025	09/07/2025
Lead in paint	%w/w	0.30	<0.005	0.02	0.02

Client Reference: 214296.04, Crows Nest

Lead in swab						
Our Reference		385198-2	385198-3	385198-28	385198-29	385198-30
Your Reference	UNITS	NT-LD01	NT-LD02	ST-G-LD1	ST-G-LD2	ST-103-LD1
Date Sampled		30/06/2025	30/06/2025	30/06/2025	30/06/2025	30/06/2025
Type of sample		Swab	Swab	Swab	Swab	Swab
Date prepared	-	08/07/2025	08/07/2025	08/07/2025	08/07/2025	08/07/2025
Date analysed	-	09/07/2025	09/07/2025	09/07/2025	09/07/2025	09/07/2025
Lead in Swabs	µg/swab	50	53	22	130	26

Lead in swab		
Our Reference		385198-31
Your Reference	UNITS	ST-304-LD1
Date Sampled		30/06/2025
Type of sample		Swab
Date prepared	-	08/07/2025
Date analysed	-	09/07/2025
Lead in Swabs	µg/swab	30

Client Reference: 214296.04, Crows Nest

Asbestos ID - materials						
Our Reference		385198-4	385198-5	385198-6	385198-7	385198-8
Your Reference	UNITS	NT-A01	NT-A02	NT-A03	NT-A04	NT-A05
Date Sampled		30/06/2025	30/06/2025	30/06/2025	30/06/2025	30/06/2025
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	08/07/2025	08/07/2025	08/07/2025	08/07/2025	08/07/2025
Mass / Dimension of Sample	-	90x50x2mm	90x40x2mm	15x10x1mm	20x10x3mm	15x8x2mm
Sample Description	-	Brown fibrous matted material	Grey paint	Beige fibrous matted material	Brown cement-like material	Beige fibre cement material
Asbestos ID in materials	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected
		Organic fibres detected	Synthetic mineral fibres detected	Organic fibres detected		Organic fibres detected
				Synthetic mineral fibres detected		
Trace Analysis	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected

Asbestos ID - materials						
Our Reference		385198-9	385198-10	385198-11	385198-12	385198-13
Your Reference	UNITS	NT-A06	NT-A07	NT-A08	NT-A09	NT-A10
Date Sampled		30/06/2025	30/06/2025	30/06/2025	30/06/2025	30/06/2025
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	08/07/2025	08/07/2025	08/07/2025	08/07/2025	08/07/2025
Mass / Dimension of Sample	-	20x15x1mm	10x7x1mm	20x15x1mm	35x20x2mm	20x15x1mm
Sample Description	-	Beige fibre cement material	White paint & fibrous material	Beige fibre cement material & sponge	Grey sponge	Beige fibre cement material
Asbestos ID in materials	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected
		Organic fibres detected	Organic fibres detected	Organic fibres detected	Organic fibres detected	Organic fibres detected
Trace Analysis	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected

Client Reference: 214296.04, Crows Nest

Asbestos ID - materials						
Our Reference		385198-14	385198-15	385198-16	385198-17	385198-18
Your Reference	UNITS	NT-A11	NT-A12	NT-A13	NT-Ext-A01	B-A01
Date Sampled		30/06/2025	30/06/2025	30/06/2025	30/06/2025	30/06/2025
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	08/07/2025	08/07/2025	08/07/2025	08/07/2025	08/07/2025
Mass / Dimension of Sample	-	60x50x5mm	20x15x1mm	20x20x1mm	30x15x5mm	50x15x2mm
Sample Description	-	Yellow vitreous fibrous insulation	Beige fibre cement material	White vitreous fibrous insulation	Brown fibrous board	Grey soft mastic
Asbestos ID in materials	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected
		Synthetic mineral fibres detected	Organic fibres detected	Synthetic mineral fibres detected	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		385198-19	385198-32	385198-33	385198-34	385198-35
Your Reference	UNITS	B-A02	ST-G-A01	ST-HALL-A1	ST-102-A1	ST-102-A2
Date Sampled		30/06/2025	30/06/2025	30/06/2025	30/06/2025	30/06/2025
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	08/07/2025	08/07/2025	08/07/2025	08/07/2025	08/07/2025
Mass / Dimension of Sample	-	50x15x10mm	15x10x1mm	20x15x5mm	22x15x4mm	16x14x6mm
Sample Description	-	Black bituminous material	Brown bituminous material	Beige fibre cement material	Black rubbery mastic	Beige fibrous insulation
Asbestos ID in materials	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected
		Organic fibres detected	Organic fibres detected	Organic fibres detected		Organic fibres detected
						Synthetic mineral fibres detected
Trace Analysis	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected

Client Reference: 214296.04, Crows Nest

Asbestos ID - materials						
Our Reference		385198-36	385198-37	385198-38	385198-39	385198-40
Your Reference	UNITS	ST-HALL3-A1	ST-HALL3-A2	ST-PL-A1	ST-PL-A2	ST-PL-A3
Date Sampled		30/06/2025	30/06/2025	30/06/2025	30/06/2025	30/06/2025
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	08/07/2025	08/07/2025	08/07/2025	08/07/2025	08/07/2025
Mass / Dimension of Sample	-	30x15x4mm	20x15x4mm	85x4x1mm	90x4x1mm	40x33x2mm
Sample Description	-	Beige fibre cement material	Beige fibre cement material	Black rubbery mastic	Black rubbery mastic	Grey paint
Asbestos ID in materials	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected
		Organic fibres detected	Organic fibres detected	Organic fibres detected	Organic fibres detected	Synthetic mineral fibres detected
Trace Analysis	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected

Asbestos ID - materials		
Our Reference		385198-41
Your Reference	UNITS	NT-EDB-A01
Date Sampled		30/06/2025
Type of sample		Material
Date analysed	-	08/07/2025
Mass / Dimension of Sample	-	30x10x1mm
Sample Description	-	Beige fibre cement material
Asbestos ID in materials	-	No asbestos detected
		Organic fibres detected
Trace Analysis	-	No asbestos detected

**Client Reference: 214296.04, Crows Nest**

Method ID	Methodology Summary
<b>ASB-001</b>	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.
<b>Metals-020/021/022</b>	Digestion of Paint chips/scrapings/liquids for Metals determination by ICP-AES/MS and or CV/AAS.
<b>Metals-020/021/022</b>	Acid digestion of Dust wipes/swabs and /or miscellaneous samples for metals determination by ICP-AES/MS and/or CV-AAS  Submission of low masses of sample e.g. for dust samples, may result in raised PQLs.

**Client Reference: 214296.04, Crows Nest**

QUALITY CONTROL: Lead in Paint				Duplicate				Spike Recovery %		
Test Description	Units	PQL	Method	Blank	#	Base	Dup.	RPD	LCS-1	[NT]
Date prepared	-			09/07/2025	25	09/07/2025	09/07/2025		09/07/2025	[NT]
Date analysed	-			09/07/2025	25	09/07/2025	09/07/2025		09/07/2025	[NT]
Lead in paint	%w/w	0.005	Metals-020/021/022	<0.005	25	<0.005	<0.005	0	103	[NT]

**Client Reference: 214296.04, Crows Nest**

QUALITY CONTROL: Lead in swab				Duplicate				Spike Recovery %		
Test Description	Units	PQL	Method	Blank	#	Base	Dup.	RPD	LCS-1	[NT]
Date prepared	-			08/07/2025	[NT]	[NT]	[NT]	[NT]	08/07/2025	[NT]
Date analysed	-			09/07/2025	[NT]	[NT]	[NT]	[NT]	09/07/2025	[NT]
Lead in Swabs	µg/swab	1	Metals-020/021/022	<1	[NT]	[NT]	[NT]	[NT]	103	[NT]

## Result Definitions

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

## Quality Control Definitions

<b>Blank</b>	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.
<b>Duplicate</b>	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.
<b>Matrix Spike</b>	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.
<b>LCS (Laboratory Control Sample)</b>	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.
<b>Surrogate Spike</b>	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.

## 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.

Air volumes are typically provided by customers (often as flow rate(s) and sampling time(s) and/or simply volumes) sampled or exposure times (determines 'volume' passive badges are exposed to)). Hence in such circumstances the volume measurement is inevitably not covered by Envirolab's NATA accreditation. An exception may occur where Envirolab Newcastle does the sampling where accreditation exists for certain types of sampling and hence volume determination(s). Note air volumes are often used to determine concentrations for dust and/or analyses on filters, sorbents and in impingers. For canister sampling, the air volume is covered by Envirolab's NATA accreditation.

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.

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.

For Dust Deposit Gauge (DDG) analysis the sampling, sampling period and funnel exposure area do not fall under Envirolab's NATA accreditation (unless the Newcastle laboratory where responsible for the sampling), hence the annotation on the DDG units of reporting.

Urine Analysis - The BEI values listed are taken from the 2022 edition of "TLVs and BEIs Threshold Limits" by ACGIH.

## Report Comments

Acid Extractable Metals in Paint: Sample #1; paint is bonded to material, every effort has been made to scrape the paint off.

Note, even after disintegration, it can be difficult to detect the presence of asbestos in some asbestos containing bulk materials using PLM and dispersion staining. This is due to the low grade or small length or diameter of the asbestos fibres present in the material, or to the fact that very fine fibres have been distributed intimately throughout the materials. Vinyl/asbestos floor tiles, some asbestos containing epoxy resins and some ore samples are examples of these types of material, which are difficult to analyse.