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Hazardous Materials Management Survey and Register 1 Apollo Place, Lane Cove West, NSW 2066

JOB NUMBER:	JN04987
ISSUED DATE:	9 April 2024
PREPARED FOR:	EMKC AUSTRALIA PTY LTD
CLIENT ADDRESS:	Level 11, 37 York Street Sydney NSW 2000 Australia
INSPECTED BY:	Faz Jalali, Occupational Hygienist
REPORT BY:	Faz Jalali, Occupational Hygienist
APPROVED BY:	Alex Clark, Senior Hazmat Consultant
ISSUE NUMBER:	Rev_0

1 Apollo Place, Lane Cove West, NSW 2066

Executive Summary

A Hazardous materials (Hazmat) survey was carried for Pawan Lala out on behalf of EMKC AUSTRALIA PTY LTD at 1 Apollo Place, Lane Cove West, NSW 2066. The scope of services for this investigation was to as far as reasonably practicable locate and record the location, extent and product type of any presumed or known hazardous materials and to provide the client with a workable register. The survey was conducted on Faz Jalali, Occupational Hygienist by 19 March 2024.

Representative samples were collected from materials as specified.

- asbestos containing materials (ACM)
- asbestos containing dust (ACD)
- asbestos in soil (AIS)
- naturally occurring asbestos (NOA)
- Lead containing paint

Visual identification of:

- Synthetic mineral fibres
- Poly-chlorinated biphenyl (PCB)-containing capacitors in fluorescent light and fan fittings

All data generated from the survey was used to create an Asbestos register (Table 3). A summary of the survey findings is shown in Table 1 and a summary of inaccessible areas is shown in (

Table *2*).

Table 1 – Summary of findings

Hazardous material	General Location	Risk	Summary Recommendation
Synthetic mineral fibres	Insulation, ceiling tiles, sarking, etc	Low	Found throughout the property. Remove under controlled conditions by competent persons during or prior to demolition
Presumed PCB	Inaccessible live fluorescent lights in various locations	Negligible	Inspect by a competent person prior to demolition and dispose of in accordance with EPA requirements
Presumed asbestos fuse boxes	Throughout property	Negligible	Live and not accessed at the time of inspection. Assess by a competent person prior to demolition. Until such time presumed to contain asbestos.

Table 2 – Summary of inaccessible areas

Location	Reason for inaccessibility
Roof	Not accessed as part of company OHS requirements
Confined spaces	Not accessed as part of company OHS requirements
Basement	Limited access due to stored good and furniture

Contents

Abbreviations/Definition

AM	Amosite asbestos (brown asbestos)
AC	Asbestos cement (asbestos-containing fibrous cement material)
ACD	Asbestos Containing Dust
ACM	Asbestos-containing material
AIS	Asbestos In Soil
AS 1216	Standards Association of Australia, Classification and Class Labels for Dangerous Goods
AS 1319	Standards Association of Australia, Rules for the Design and Use of Safety Signs for the Occupational Environment
AS 1715	Standards Association of Australia, Selection, Use and Maintenance of Respiratory Protective Devices
AS 1716	Standards Association of Australia, Respiratory Protective Devices
ASCC	Australian Safety & Compensation Council
CR	Crocidolite asbestos (blue asbestos)
CH	Chrysotile asbestos (white asbestos)
DECC	Department of Environment and Climate Change (now NSW EPA)
EPA	Environment Protection Authority
FC	Fibre cement (usually sheeting)
NAD	No asbestos detected
NATA	National Association of Testing Authorities, Australia
NOA	Naturally Occurring Asbestos
NOHSC	National Occupational Health and Safety Commission
P	Presumed asbestos material
PPE	Personal protective equipment
SMF	Synthetic Mineral Fibre
SP	Strongly Presumed
RPE	Respiratory protective equipment
WH&S	Workplace health and safety

1. Introduction

A hazardous materials management survey was carried out for Pawan Lala on behalf of EMKC AUSTRALIA PTY LTD (client), at 1 Apollo Place, Lane Cove West, NSW 2066 by Faz Jalali, Occupational Hygienist on 19 March 2024. The site 1990s office block which is planned to be demolished as part of the development process for the data centre constructed on site.

The aim of survey was to identify accessible or presumed hazardous materials as far as reasonably practicable and to prepare a material register, provide a qualitative risk assessment and provide recommendation and procedures to allow the client to manage their risk at their premises.

2. Procedure

2.1 Survey methodology

The adopted survey undertaken was in line with the Health and Safety Executive (HSE) document The Survey Guide (HSG 264).

Management Survey, identification and assessment survey (presumptive and sampling survey). Methodology is a combination of visual inspection of the accessible areas of the building/structure and entails the collection of representative samples where possible, required for subsequent laboratory analysis. This type of survey is fundamentally intrusive but not destructive.

2.1.1 Asbestos

Asbestos analysis on the samples collected were conducted by a laboratory accredited under the National Association of Testing Authorities (NATA) to ISO/IEC 17025. The methodology adopted is polarised light microscopy (PLM) under dispersion staining.

Where visually identical suspect materials are identified at different locations, they may be referenced to previously sampled materials and considered to contain asbestos. However, where it is not possible to sample, materials that can be reasonably anticipated to contain asbestos are **presumed** as such. Furthermore, where materials are considered to be most likely asbestos, samples may not be taken and the material is **strongly presumed** to contain asbestos.

2.1.2 Lead paint

Representative samples had been taken and forwarded to a NATA laboratory for analysis. Laboratory analysis of lead based paints is used to achieve a reportable weight by weight percentage of lead throughout the paint layers and is reported against the Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017] in which the lead content (calculated as lead metal) is in excess of 0.1 % by weight of the dry film as determined by laboratory testing.

2.1.3 Synthetic mineral fibres (SMF) materials

Most SMF is identified using visual indicator and surveyor experience. SMF can also be identified by laboratory using Polarised Light Microscopy supplemented with Dispersion Staining techniques.

2.1.4 Polychlorinated biphenyls (PCBs)

Capacitors to most light fittings and fans are presumed to be PCB containing based on visual indicators and the age of the building and light fittings. Where safe access to capacitors is possible, the details of the brand, model of each capacitor and capacity were recorded and checked against the ANZECC database of known PCB capacitors and PCB free capacitors.

2.2 Survey accessibility

Access was made only where it was safe to do so, such as by solid floors, decking, walkways, protected catwalks or ladders was available. Minimal to no disturbance of any equipment was undertaken as part of the survey as all plant, electrical installations, pipe-work and associated equipment that were considered live at the time of the survey.

Access through the buildings and structures on the site was made by systematic walkthrough, with the order of the items listed in the asbestos register reflective of the order of the survey.

Access is often restricted to structures such as:

- Support columns, enclosed within cladding or concealed within the fabric of the building; sealed voids (under solid floor, wall or ceiling).
- Under suspected Asbestos, i.e. nothing that would disturb possible asbestos materials and give rise to airborne fibres.
- Within live electrical fuse or switch boxes; conduits and all other live plant items, lift machinery and fire doors at the time of the survey.
- Within building voids, internal partition walls, fitted flooring, beneath ceramic tiles non-asbestos tiling and carpets
- Above 3 metres in height, or roof where safe access is not provided
- Within confined spaces

2.3 Risk Assessment

The risk assessment methodology adopted for this survey is predominantly a qualitative one and it relies on the competence and training of the surveyor and their interpretation of the risk matrix. To utilise the Asbestos risk matrix found within (Appendix A – Qualitative Risk Matrix) of this report, the following factors must be considered:

- Condition of the material. This is described as being either
  - good (not been damaged or have not deteriorated)
  - medium (minor deterioration or damage) or
  - poor (materials which have been extensively damaged or their condition has deteriorated over time);
- Proximity of air plenums and direct air stream
- Friability of the material (ease with which the material can be crumbled) listed as either friable or non-friable (If Applicable)
- Requirement for access for building or maintenance operations and accessibility (low, medium or high)
- Likelihood of disturbance of the material
- Exposed surface areas and;
- Environmental conditions.

These aspects are in turn judged upon;

a) potential for fibre generation (Friability) and,
b) the potential for exposure.

3. Asbestos Limitation

3.1 Scope of Services

This Hazmat Register ("**the Register**") will be prepared in accordance with the details set out in this contract between the Client and EHO Consulting Pty Ltd ACN 620 205 192 ("**EHOC**").

3.2 Scope of Services

The Scope of Services may have been limited by a range of factors such as time, budget, access and/or site disturbance constraints and these factors will be set out in the Register provided by EHOC to the Client.

3.3 Reliance on data

In preparing this report, EHOC has relied upon data, surveys, analyses, designs, plans and other information provided by the Client and associated individuals and organisations which are referred to in this report ("**the Data**").

Unless otherwise stated in the report, EHOC has not verified the accuracy or completeness of the Data to the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report ("**Conclusions**") are based on the whole or part of the Data so supplied by the Client then the Conclusions set out in this report are contingent upon the accuracy and completeness of the Data.

In addition to the information provided by the Client to EHOC, EHOC will not be liable in the future in any way in relation to incorrect Conclusions should any Data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to EHOC by the Client.

3.4 Report for the benefit of Client

The report has been prepared for the benefit of the Client and no other party. EHOC assumes no responsibility and will not be liable to any other person or organisation for or in relation to any matter dealt with or Conclusions expressed in the Report, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in the Report (including without limitation matters arising from any negligent act or omission of EHOC or for any loss or damage suffered by any other party in relying upon the matters dealt with or Conclusions expressed in the Report). Other parties should not rely upon the report or the accuracy or completeness of any Conclusions and should make their own enquiries and obtain independent advice in relation to such matters.

3.5 Other limitations

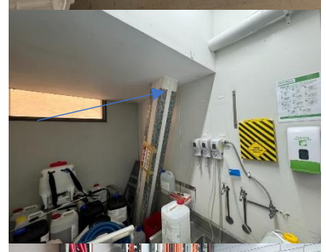
EHOC will not be liable to update or revise the report to take into account any events, emergent circumstances or facts occurring or becoming apparent after the date of the Report.

The Scope of Services did not include any assessment of the title to nor ownership of the properties, buildings and structures referred to in the report, nor the application or interpretation of laws in the jurisdiction in which those properties, buildings and structures are located.

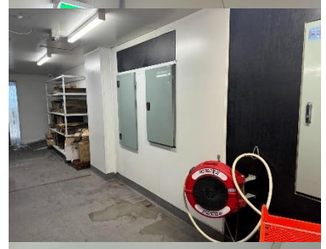
The Scope of Services encompasses the totality of the work that will be completed by EHOC.

4. Survey findings

Table 3 – Hazardous Materials Register

Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
Building Description: The building is a 2-storey office and food processing block with brick external walls with cement render to the facade of the building, concrete flooring throughout. The building's interior consists mostly of plaster walls and fitted vinyl sheeting with limited access above a suspended ceiling, behind installed cool rooms and refrigerators and under the fitted carpets.								
Lower ground floor	Thermoplastic plastic floor tiles in store room	A1	NAD	NA	NA	NA	No further action required.	
Lower ground floor	Soft insulation board in Chem store	A2	NAD	NA	NA	NA	No further action required.	
Lower ground	Presumed asbestos backing board to fuse boxes	P1	**Presumed Asbestos**	3 units	NF	Negligible	Inspect by a competent person prior to planned demolition works	
Lower ground	Presumed asbestos backing board to switch board	P2	**Presumed Asbestos**	1 unit	NF	Negligible	Inspect by a competent person prior to planned demolition works	

Key: CH=Chrysotile, AM=Amosite, CR=Crocidolite, UMF=Unknown mineral fibre. SMF=Synthetic Mineral Fibres, NAI=No Asbestos Identified, NHD=No Hazmat Detected, NAD=No Asbestos Detected, NHI=No Hazmat Identified, F=Friable Asbestos within soft matrix, NF=Non-Friable Asbestos (i.e. Bonded) Asbestos within solid matrix, TH=Throughout, P=Presumed, SP=Strongly Presumed, R=Referenced sample, TH=Throughout, UK=Unknown, Lm=Linear Metre

Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
Lower ground	White paint on walls and ceiling	L1	<0.1%	TH	NA		No further action required.	
Lower ground floor	Bitumen pad under sink in staff room	A3	NAD	NA	NA	NA	No further action required.	
Lower ground level	Presumed PCB capacitor to ceiling mounted fluorescent light	PCB1	Presumed PCB	1 unit	NA	Negligible	Inspect and remove and dispose of in accordance with EPA requirements prior to demolition	
Lower ground	Presumed asbestos backing board to fuse boxes	P3	**Presumed Asbestos**	2 units	NF	Negligible	Inspect by a competent person prior to planned demolition works	
Lower ground level	Flexible insulation ducts above suspended ceiling in toilets	SMF1	**SMF**	TH	F	Negligible	Remove under controlled conditions during or before demolition works by competent persons	

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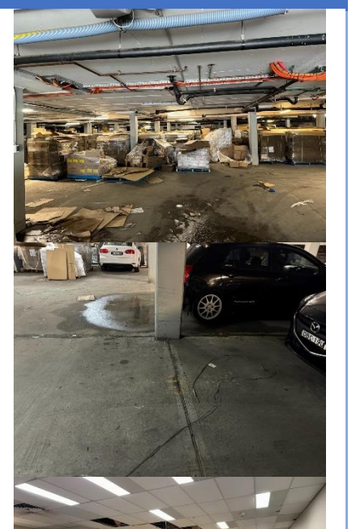
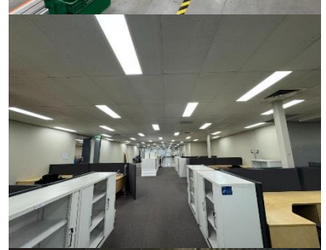
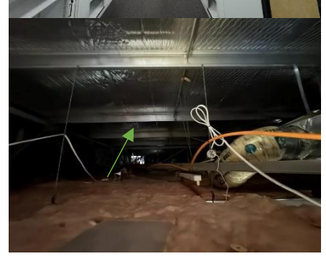
Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
Garage	White paint on walls and ceiling	L1/R1	<0.1%	TH	NA		No further action required. Note, limited access to the garage due to stored goods and furniture	
Garage	Floor movement joint	A4	NAD	NA	NA	NA	No further action required.	
Ground floor	Vinyl sheeting throughout	A5	NAD	NA	NA	NA	No further action required.	
Ground floor	Suspended ceiling tiles in office areas	SMF2	**SMF**	TH	F	Low	Remove under controlled conditions during or before demolition works by competent persons	
Ground floor	Sarking to roof panels above suspended ceiling	SMF3	**SMF**	TH	F	Low	Remove under controlled conditions during or before demolition works by competent persons	

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Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
Ground floor	Loose insulation batts above suspended ceiling	SMF4	**SMF**	TH	F	Low	Remove under controlled conditions during or before demolition works by competent persons	
Ground level	Presumed asbestos backing board to fuse boxes	P4	**Presumed Asbestos**	2 units	NF	Negligible	Inspect by a competent person prior to planned demolition works	
Ground floor	Mastic seal to aluminium windows	A6	NAD	NA	NA	NA	No further action required.	
Ground level	Presumed asbestos backing board to fuse box in office	P5	**Presumed Asbestos**	2 units	NF	Negligible	Inspect by a competent person prior to planned demolition works	
External	Fibre cement awing to entrance	A7	NAD	NA	NA	NA	No further action required.	

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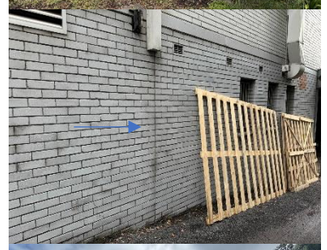
Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
External	Wall lining to external store	A8	NAD	NA	NA	NA	No further action required. No access internally	
External	Bitumen wall movement joint	A9	NAD	NA	NA	NA	No further action required.	
External	Grey paint on brick structures	L2	<0.1%	NA	NA	NA	No further action required.	

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5. Marked Plans

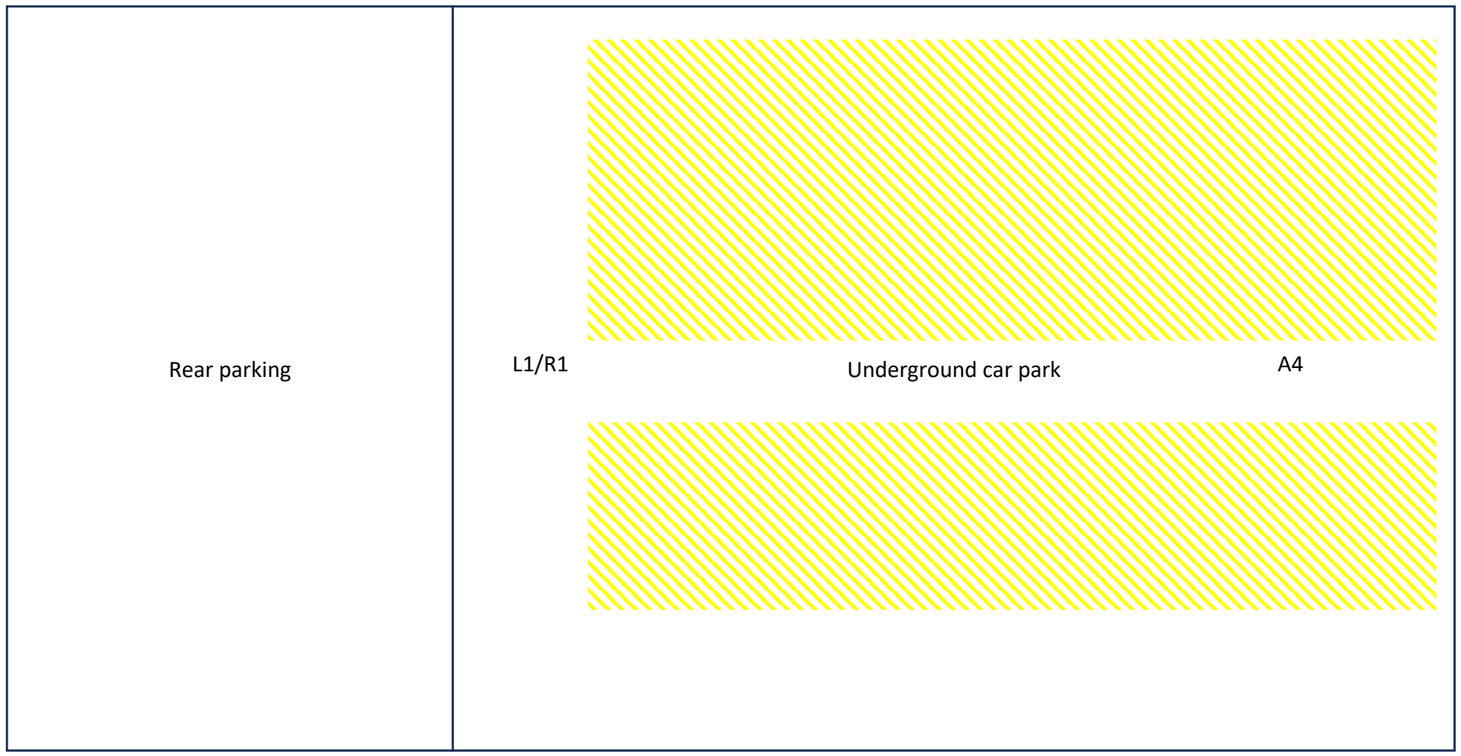

Figure 1 - Depicts site plan and sample location basement

Key

Inaccessible Area | Area Containing Presumed Asbestos | Area Containing PCB | Area Containing SMF | Area Containing Lead

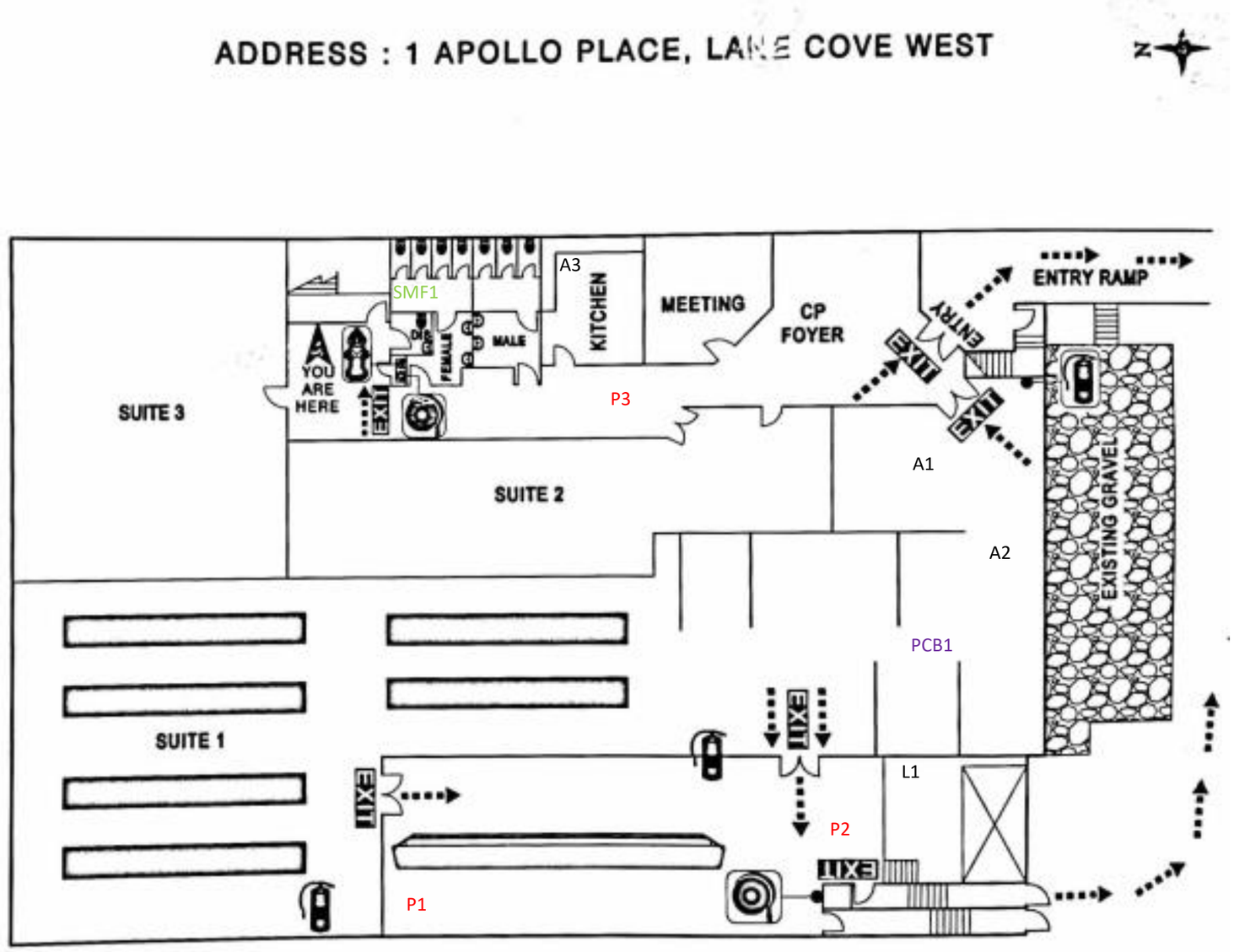

Figure 2 - Depicts site plan and sample location lower ground

Key

Inaccessible Area | Area Containing Presumed Asbestos | Area Containing PCB | Area Containing SMF | Area Containing Lead

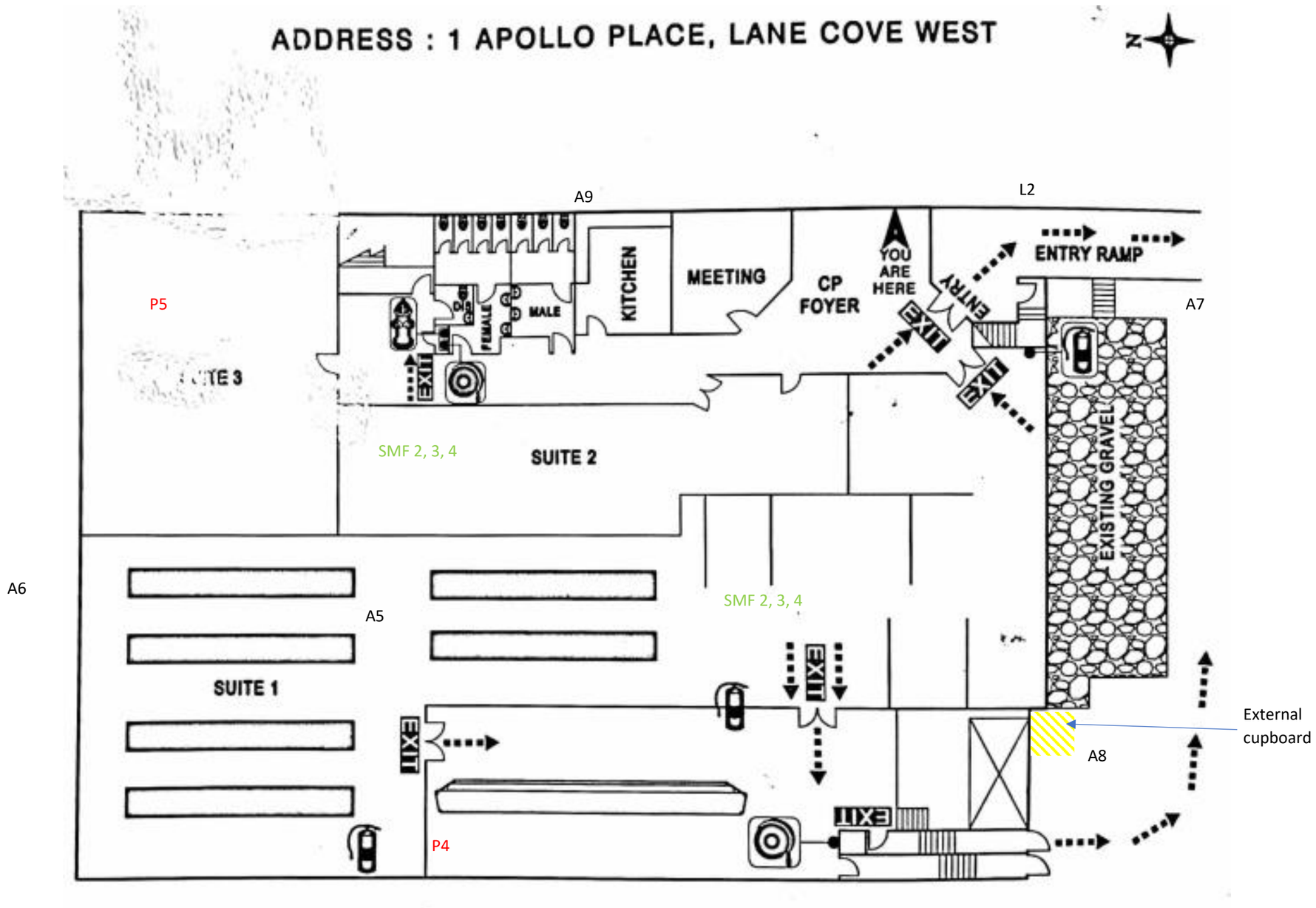

Figure 3 - Depicts site plan and sample location ground

Key
Inaccessible Area | Area Containing Presumed Asbestos | Area Containing PCB | Area Containing SMF | Area Containing Lead

Appendix A – Qualitative Risk Matrix

Table 4 – Condition and Disturbance Assessment

Condition		
1	GOOD	NO OBVIOUS DETERIORATION, SECURED IN PLACE, SEALED AND ENCAPSULATED.
2	LOW DAMAGE	SCRAPES AND SCTARCHES, ENCAPSULATED
3	FAIR	MINOR DAMAGE OR DETERIORATION, NOT SEALED OR ENCAPSULATED
4	MODERATE	MAJOR DAMAGE THROUGHOUT, NO DEBRIS OR DUST, NOT BE SEALED / ENCAPSULATED
5	POOR	OBVIOUS DAMAGED OR DETERIORATION, EXTENSIVE DUST AND CONTAMINATION
Accessibility		
1	INACCESSIBLE	NOT ACCESSIBLE BUT VISIBLE
2	UNLIKELY	DISTURBANCE UNLIKELY DURING TYPICAL OCCUPATION OF THE BUILDING
3	POSSIBLE	DISTURBANCE UNLIKELY DURING TYPICAL OCCUPANCY OF THE BUILDING HOWEVER MAY OCCUR DURING MAINTENANCE WORKS
4	LIKELY	DISTURBANCE MAY OCCUR DURING TYPICAL OCCUPANCY OF THE BUILDING AND IS LIKELY DURING MAINTENANCE WORKS
5	CERTAIN	VERY LIKELY TO OCCUR DUE HIGHT AND TRASIT ROUT

Table 5 – Risk Assessment Chart

Material Condition		Probability of Disturbance				
		Inaccessible	Unlikely	Possible	Likely	Certain
		1	2	3	4	5
Good	1	2	3	4	5	6
Low	2	3	4	5	6	7
Fair	3	4	5	6	7	8
Moderate	4	5	6	7	8	9
Poor	5	6	7	8	9	10

LEGEND: 1-3 NEGLIGIBLE 4-5 LOW RISK 6-7 MEDIUM RISK 8-10 HIGH RISK

Appendix B – Legislative Requirements

Table 6 – Australian legislative requirements

STATE Primary Asbestos Legislation	Asbestos Survey Requirements	Asbestos Documentation Review Requirements	Reporting Requirements	Supporting Documentation
COMMONWEALTH **Work Health & Safety Act 2011** **Work Health & Safety Regulations 2011** ***Chapter 8 – Asbestos*** https://www.safeworkaustralia.gov.au/safety-topic/hazards/asbestos/resources	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. Work Health and Safety (How to Safely Remove Asbestos Code of Practice) Approval 2020 AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
AUSTRALIAN CAPITAL TERRITORY **Work Health & Safety Act 2011** **Work Health & Safety Regulations 2011** ***Chapter 8 – Asbestos*** https://www.worksafe.act.gov.au/laws-and-compliance/codes-of-practice	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. Work Health and Safety (How to Safely Remove Asbestos Code of Practice) Approval 2020 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
NEW SOUTH WALES **Work Health & Safety Act 2011** **Work Health & Safety Regulations 2017** ***Chapter 8 – Asbestos*** https://www.safework.nsw.gov.au/hazards-a-z/asbestos	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. NSW Government Code of Practice – How to Manage and Control Asbestos in the Workplace 2022. How to Safely Remove Asbestos: Code of Practice 2022. Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
NORTHERN TERRITORY **Work Health & Safety (National Uniform Legislation) Act 2011** **Work Health & Safety (National Uniform Legislation) Regulations 2011**	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. Work Health and Safety (How to Safely Remove Asbestos Code of Practice) Approval 2020 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)]

STATE Primary Asbestos Legislation	Asbestos Survey Requirements	Asbestos Documentation Review Requirements	Reporting Requirements	Supporting Documentation
Chapter 8 – Asbestos https://asbestos.nt.gov.au/general-information/legislation-and-codes-of-practice	A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.		Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
QUEENSLAND **Work Health & Safety Act 2011** **Work Health & Safety Regulations 2011** ***Chapter 8 – Asbestos*** https://www.asbestos.qld.gov.au/general-information/legislation-and-codes-practice	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. WHSQ How to manage and control asbestos in the workplace Code of Practice 2021 WHSQ How to Safely Remove Asbestos Code of Practice 2021 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
SOUTH AUSTRALIA **Work Health & Safety Act 2012** **Work Health & Safety Regulations 2012** ***Chapter 8 – Asbestos*** https://www.safework.sa.gov.au/workplaces/codes-of-practice#COPs	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. Gov. of South Australia - How to Safely Remove Asbestos Code of Practice 2020 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
TASMANIA **Work Health & Safety Act 2012** **Work Health & Safety Regulations 2012** ***Chapter 8 – Asbestos*** https://worksafe.tas.gov.au/asbestos	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2018. Safe Work Australia Code of Practice – How to Safely Remove Asbestos 2018 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021

STATE Primary Asbestos Legislation	Asbestos Survey Requirements	Asbestos Documentation Review Requirements	Reporting Requirements	Supporting Documentation
			An asbestos register is not required if building was constructed after 31 December 2003.	Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
VICTORIA **Occupational Health & Safety Act 2004** **Occupational Health and Safety Regulations 2017** – ***Part 4.4 - Asbestos*** **https://www.worksafe.vic.gov.au/asbestos**	Person who manages or controls a workplace must ensure, so far is reasonably practicable, identify all asbestos present that is under their management or control. Must determine the location, type, friability condition and likelihood of ACM sustaining damage or deterioration. Division 6 requires that prior to any demolition or refurbishment works, the person who manages or controls the workplace must review the asbestos register and revise if it is inadequate in regard to the planned works.	Undertake review and revision of risk assessment when condition of asbestos changes, remedial work has been carried out or the assessment is no longer valid. At least once every 5 years.	Reports must include the type, location, friability & condition of asbestos, Identification of inaccessible areas and risk assessment including dates.	Work Safe Victoria Compliance Code – Managing Asbestos in Workplaces 2019 Work Safe Victoria Compliance Code – Removing Asbestos in Workplaces 2019 AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
WESTERN AUSTRALIA **Occupational Safety and Health Act 1984** **Occupational Health and Safety Regulations 1996** ***Division 4 - Further requirements in relation to certain hazardous substances. Subdivision 1 – Asbestos. Regulation 5.43*** **https://www.commerce.wa.gov.au/worksafe/occupational-safety-and-health-act-and-regulations**	Employer, main contractor, self-employed person or person having control of the workplace to ensure that presence and location of asbestos at the workplace is identified. The process of identification and assessment of risks arising from asbestos hazards are to be conducted in accordance with the Code of Practice for the Management and Control of Asbestos in Workplaces [NOHSC: 2018 (2005)].	Annual review of register and management plan under NOHSC: 2018(2005). A visual inspection of ACM should be undertaken as part of any review.	Under NOHSC:2018(2005): Maintain a register on the premises which includes date of assessment, location & types of asbestos, analysis, risk assessments, control measures, and details of competent person who undertook the assessment. Details of presumptions made and likely asbestos in inaccessible areas to be included	Health (Asbestos) Regulations 1992 Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC: 2002 (2005)] Code of Practice for the Management and Control of Asbestos in Workplaces [NOHSC:2018 (2005)] Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.

Appendix C – Analysis certificates

SYDNEY
ANALYTICAL
LABORATORIES

Office:
PO BOX 48
ERMINGTON NSW 2115

Laboratory:
1/4 ABBOTT ROAD
SEVEN HILLS NSW 2147
Telephone: (02) 9838 8903
Fax: (02) 9838 8919
A.C.N. 003 614 695
A.B.N. 81 829 182 852
NATA No: 1884

ANALYTICAL REPORT for:

EHO CONSULTING

16/380 PENNANT HILLS RD
PENNANT HILLS 2020

ATTN: FAZ JALALI

JOB NO: SAL28830L

CLIENT ORDER: JN04987

DATE RECEIVED: 03/04/24

DATE COMPLETED: 05/04/24

TYPE OF SAMPLES: PAINTS

NO OF SAMPLES: 2

NATA Accredited for compliance with ISO/IEC 17025 Testing

.....
Issued on 05/04/24
Lance Smith
(Chief Chemist)

ANALYTICAL REPORT

JOB NO: SAL28830L
CLIENT ORDER: JN04987

	SAMPLES	Pb %
1	L1	<0.01
2	L2	<0.01

MDL	0.01
Method Code	A8
Preparation	P1

DATE OF COLLECTION: 19/03/24
SITE: 7 APOLLO LANE

ANALYTICAL REPORT

JOB NO: SAL28830L
CLIENT ORDER: JN04987

METHODS OF PREPARATION AND ANALYSIS

The tests contained in this report have been carried out on the samples as received by the laboratory. In the case where an analyte or group of analytes are received outside of recommended holding times, the analysis will proceed and the report annotated. Analysis is carried out within analyte holding times where possible.

P1	Analysis performed on sample as received
A8	Total Lead in Paint/Dust - In House Method A8 Determined by APHA 3111B (Flame AAS)

EHO CONSULTING
ENVIRONMENTAL HAZMAT OCCUPATIONAL

EHO Consulting Pty Ltd
16/380 Pennant Hills Rd
Pennant Hills, NSW 2120

ABN 49 620 205 192
www.ehoc.com.au
info@ehoc.com.au

Job Number: JN04987
Lab Number: LN08575
Client: EMKC AUSTRALIA PTY LTD
Contact: Pawan Lala - pawan.lala@emkc3.com
Client Address: Chartered Accountants House Level 11 37 York StSYDNEY 2000
Purchase Order (PO):NA

Requested by: EMKC AUSTRALIA PTY LTD
Sample Date: Tuesday 19 March 2024
Sampled By: Faz Jalali
Date Received: Thursday 28 March 2024
Date Analysed: Tuesday 2 April 2024

Asbestos Certificate of Analysis
AS4964 (2004) Method for the Qualitative Identification of Asbestos in Bulk Samples

Site address: 2 Apollo Place, Lane Cove West NSW, Australia 2066

Asbestos samples have been examined at EHO Consulting (EHOC) Sydney Laboratory, 16/380 Pennant Hills Rd, Pennant Hills, NSW 2120. Analysis undertaken is a qualitative identification of asbestos fibres in bulk and soil samples by polarised light microscopy, including dispersion staining, in accordance with AS4964 (2004) Method for the qualitative identification of asbestos in bulk samples and EHOC's Asbestos Bulk Soil ID Standard Operating Procedure (CD38) and NATA Accreditation **No# 20381**, . Trace analysis carried out on all non-homogenous samples. Accredited for compliance with ISO/IEC: 17025-Testing. NATA is a signatory to the ILAC Mutual Recognition Arrangement for the mutual recognition of the equivalence of testing, medical testing, calibration, inspection, proficiency testing scheme providers and reference materials producers reports and certificates

LAB ID NUMBER	SAMPLE NUMBER	DESCRIPTION	LOCATION	SAMPLE DIMENSIONS	RESULT	COMMENTS
LIN01	A1	Thermoplastic tiles	Ground floor store	4g	NAD, OF	Sample consists of grey vinyl tile with clear adhesive
LIN02	A2	Soft Fibre Board	Ground floor chem store	1g	NAD, OF	
LIN03	A3	Bitumen	Pad under sink, staff room	3g	NAD, OF	
LIN04	A4	Bitumen	Floor movement joint, garage	1g	NAD, OF	
LIN05	A5	Vinyl sheeting	Flooring , first floor	3g	NAD, OF	Sample consists of blue vinyl sheeting with clear adhesive.
LIN06	A6	Mastic	Window sill, first floor	1g	NAD, OF	
LIN07	A7	Cement	External awning	1g	NAD, OF	
LIN08	A8	Cement	External cupboard wall	3g	NAD, OF	
LIN09	A9	Bitumen	Wall movement joint external	1g	NAD, OF	

Key:

NAD - No Asbestos Detected, CH - Chrysotile Asbestos Detected, AM - Amosite Asbestos Detected, CR - Crocidolite Asbestos Detected, UMF - Unknown Mineral Fibres Detected, SMF - Synthetic Mineral Fibres Detected, OF - Organic Fibres Detected, Trace - Trace Asbestos Detected, * - No trace asbestos detected at the reporting limit of 0.1 g/kg

Limitations

The results contained in this report relate only to the sample/s submitted for testing. The laboratory accepts no responsibility for location, sampling date, sample ID, sampler and client details provided. Results indicating "No asbestos detected" indicates a reporting limit specified in AS4964 -2004 which is 0.1g/ Kg (0.01%). Any amounts detected at assumed lower level than that would be reported, however those assumed lower levels may be treated as "No Asbestos Detected" as specified and recommended by A4964-2004. Loose asbestos fibres/ fibre bundles are detected and reported as handpicked fibres/ fibre bundles, and they do not represent respirable fibres. All non-homogenous samples such as dust and soils are subject to trace analysis, unless impractical to do so due to nature or size of the sample.

^Dust samples taken using a tape as sample collection method (Dust on Tape) are outside of NATA sample requirements and are not accredited under EHO's scope of accreditation.

If no asbestos is detected in vinyl tiles, mastics, sealants, epoxy resins and ore samples then confirmation by another independent analytical technique is advised due to the nature of the samples. EHO Group accepts no responsibility for the initial collection, packaging or transportation of samples submitted by a non EHO consultant / employee. This document may not be reproduced except in full.

Approved Analyst : **Mathew Sutton**

Date: 02-04-2024

Approved Signatory: **Mathew Sutton**

Date: 02-04-2024

Report disclaimants

This report has been prepared by EHO Consulting Pty Ltd ACN 620 205 192 ("EHOC"), and its contents were provided exclusively for the use of the Client.

Every care has been taken in the preparation of this report and its contents are believed to be accurate at the date of report. However, EHOC, its officers, employees and contractors ("personnel") do not give any representations or warranties as to the reliability, accuracy or completeness of the report. Both EHOC and its personnel are not liable for any loss or damage (whether direct or indirect), howsoever arising (whether in negligence or otherwise), out of or in connection with this report, except where such liability is made non-excludable by legislation.

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1. a supply of goods (or equivalent goods) or services again; or
2. the payment of the cost of having the goods (or equivalent goods) or services supplied again.

EHO CONSULTING
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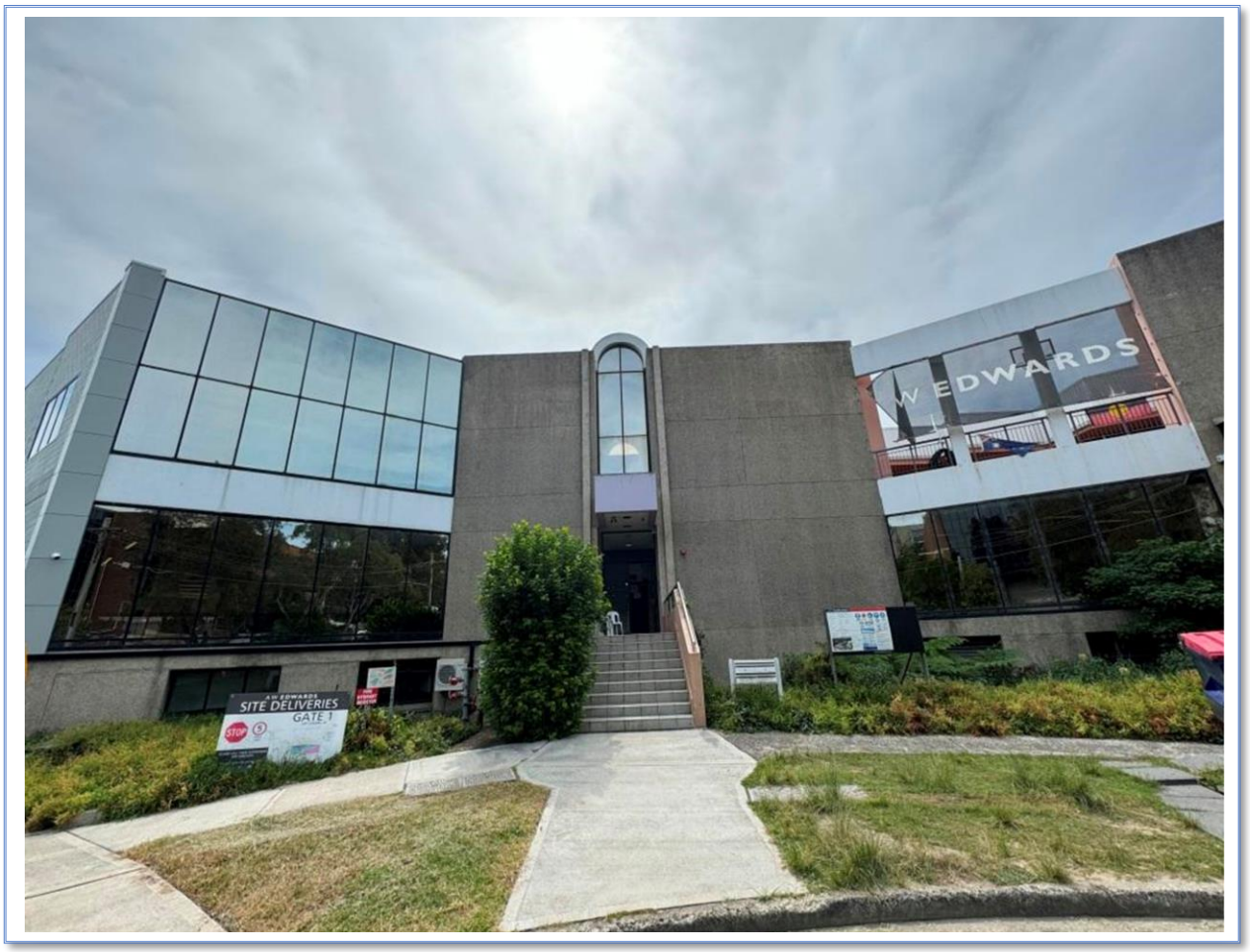
Pennant Hills NSW 2120

ABN 49 620 205 192
www.ehoc.com.au
info@ehoc.com.au

Hazardous Materials Management Survey and Register 2 Apollo Place, Lane Cove West, NSW 2066

JOB NUMBER:	JN04987
ISSUED DATE:	21 March 2024
PREPARED FOR:	EMKC AUSTRALIA PTY LTD
CLIENT ADDRESS:	Level 11, 37 York Street Sydney NSW 2000 Australia
INSPECTED BY:	Faz Jalali, Occupational Hygienist
REPORT BY:	Faz Jalali, Occupational Hygienist
APPROVED BY:	Alex Clark, Senior Hazmat Consultant
ISSUE NUMBER:	Rev_0



2 Apollo Place, Lane Cove West, NSW 2066

Executive Summary

A Hazardous materials (Hazmat) survey was carried for Pawan Lala out on behalf of EMKC AUSTRALIA PTY LTD at 2 Apollo Place, Lane Cove West, NSW 2066. The scope of services for this investigation was to as far as reasonably practicable locate and record the location, extent and product type of any presumed or known hazardous materials and to provide the client with a workable register. The survey was conducted on Faz Jalali, Occupational Hygienist by 06 March 2024.

Representative samples were collected from materials as specified.

- asbestos containing materials (ACM)
- asbestos containing dust (ACD)
- asbestos in soil (AIS)
- naturally occurring asbestos (NOA)
- Lead containing paint

Visual identification of:

- Synthetic mineral fibres
- Poly-chlorinated biphenyl (PCB)-containing capacitors in fluorescent light and fan fittings

All data generated from the survey was used to create an Asbestos register (Table 3). A summary of the survey findings is shown in Table 1 and a summary of inaccessible areas is shown in (Table 2).

Table 1 – Summary of findings

Hazardous material	General Location	Risk	Summary Recommendation
Sprayed insulation to ceiling and structures above suspended ceiling tiles	Throughout building	Medium	Found throughout the property. Remove under controlled conditions by competent persons during or prior to demolition
Synthetic mineral fibres	Insulation, ceiling tiles, fire blankets, pillows, etc.	Low	Found throughout the property. Remove under controlled conditions by competent persons during or prior to demolition
Presumed PCB	Inaccessible live fluorescent lights in various locations	Negligible	Inspect by a competent person prior to demolition and dispose of in accordance with EPA requirements
Presumed asbestos fuse boxes	Throughout property	Negligible	Live and not accessed at the time of inspection. Assess by a competent person prior to demolition. Until such time presumed to contain asbestos.

Hazardous material	General Location	Risk	Summary Recommendation
Presumed cowl to exhaust pipe on roof	1.9 Roof	Negligible	Inaccessible for close inspection. Inspect by a competent person prior to demolition

Table 2 – Summary of inaccessible areas

Location	Reason for inaccessibility
Roof	Not accessed as part of company OHS requirements
Confined spaces	Not accessed as part of company OHS requirements
G.03 Stone art, CRS computers G.04 DCS Contractor, B.01 Basement, Light motor room	Locked at the time of inspection. For more details refer to hazmat register

Contents

Abbreviations/Definition

AM	Amosite asbestos (brown asbestos)
AC	Asbestos cement (asbestos-containing fibrous cement material)
ACD	Asbestos Containing Dust
ACM	Asbestos-containing material
AIS	Asbestos In Soil
AS 1216	Standards Association of Australia, Classification and Class Labels for Dangerous Goods
AS 1319	Standards Association of Australia, Rules for the Design and Use of Safety Signs for the Occupational Environment
AS 1715	Standards Association of Australia, Selection, Use and Maintenance of Respiratory Protective Devices
AS 1716	Standards Association of Australia, Respiratory Protective Devices
ASCC	Australian Safety & Compensation Council
CR	Crocidolite asbestos (blue asbestos)
CH	Chrysotile asbestos (white asbestos)
DECC	Department of Environment and Climate Change (now NSW EPA)
EPA	Environment Protection Authority
FC	Fibre cement (usually sheeting)
NAD	No asbestos detected
NATA	National Association of Testing Authorities, Australia
NOA	Naturally Occurring Asbestos
NOHSC	National Occupational Health and Safety Commission
P	Presumed asbestos material
PPE	Personal protective equipment
SMF	Synthetic Mineral Fibre
SP	Strongly Presumed
RPE	Respiratory protective equipment
WH&S	Workplace health and safety

1. Introduction

A hazardous materials management survey was carried out for Pawan Lala on behalf of EMKC AUSTRALIA PTY LTD (client), at 2 Apollo Place, Lane Cove West, NSW 2066 by Faz Jalali, Occupational Hygienist on 06 March 2024. The site 1990s office block which is planned to be demolished as part of the development process for the data centre constructed on site.

The aim of survey was to identify accessible or presumed hazardous materials as far as reasonably practicable and to prepare a material register, provide a qualitative risk assessment and provide recommendation and procedures to allow the client to manage their risk at their premises.

2. Procedure

2.1 Survey methodology

The adopted survey undertaken was in line with the Health and Safety Executive (HSE) document The Survey Guide (HSG 264).

Management Survey, identification and assessment survey (presumptive and sampling survey). Methodology is a combination of visual inspection of the accessible areas of the building/structure and entails the collection of representative samples where possible, required for subsequent laboratory analysis. This type of survey is fundamentally intrusive but not destructive.

2.1.1 Asbestos

Asbestos analysis on the samples collected were conducted by a laboratory accredited under the National Association of Testing Authorities (NATA) to ISO/IEC 17025. The methodology adopted is polarised light microscopy (PLM) under dispersion staining.

Where visually identical suspect materials are identified at different locations, they may be referenced to previously sampled materials and considered to contain asbestos. However, where it is not possible to sample, materials that can be reasonably anticipated to contain asbestos are **presumed** as such. Furthermore, where materials are considered to be most likely asbestos, samples may not be taken and the material is **strongly presumed** to contain asbestos.

2.1.2 Lead paint

Representative samples had been taken and forwarded to a NATA laboratory for analysis. Laboratory analysis of lead based paints is used to achieve a reportable weight by weight percentage of lead throughout the paint layers and is reported against the Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017] in which the lead content (calculated as lead metal) is in excess of 0.1 % by weight of the dry film as determined by laboratory testing.

2.1.3 Synthetic mineral fibres (SMF) materials

Most SMF is identified using visual indicator and surveyor experience. SMF can also be identified by laboratory using Polarised Light Microscopy supplemented with Dispersion Staining techniques.

2.1.4 Polychlorinated biphenyls (PCBs)

Capacitors to most light fittings and fans are presumed to be PCB containing based on visual indicators and the age of the building and light fittings. Where safe access to capacitors is possible, the details of the brand, model of each capacitor and capacity were recorded and checked against the ANZECC database of known PCB capacitors and PCB free capacitors.

2.2 Survey accessibility

Access was made only where it was safe to do so, such as by solid floors, decking, walkways, protected catwalks or ladders was available. Minimal to no disturbance of any equipment was undertaken as part of the survey as all plant, electrical installations, pipe-work and associated equipment that were considered live at the time of the survey.

Access through the buildings and structures on the site was made by systematic walkthrough, with the order of the items listed in the asbestos register reflective of the order of the survey.

Access is often restricted to structures such as:

- Support columns, enclosed within cladding or concealed within the fabric of the building; sealed voids (under solid floor, wall or ceiling).
- Under suspected Asbestos, i.e. nothing that would disturb possible asbestos materials and give rise to airborne fibres.
- Within live electrical fuse or switch boxes; conduits and all other live plant items, lift machinery and fire doors at the time of the survey.
- Within building voids, internal partition walls, fitted flooring, beneath ceramic tiles non-asbestos tiling and carpets
- Above 3 metres in height, or roof where safe access is not provided
- Within confined spaces

2.3 Risk Assessment

The risk assessment methodology adopted for this survey is predominantly a qualitative one and it relies on the competence and training of the surveyor and their interpretation of the risk matrix. To utilise the Asbestos risk matrix found within (Appendix A – Qualitative Risk Matrix) of this report, the following factors must be considered:

- Condition of the material. This is described as being either
  - good (not been damaged or have not deteriorated)
  - medium (minor deterioration or damage) or
  - poor (materials which have been extensively damaged or their condition has deteriorated over time);
- Proximity of air plenums and direct air stream
- Friability of the material (ease with which the material can be crumbled) listed as either friable or non-friable (If Applicable)
- Requirement for access for building or maintenance operations and accessibility (low, medium or high)
- Likelihood of disturbance of the material
- Exposed surface areas and;
- Environmental conditions.

These aspects are in turn judged upon;

a) potential for fibre generation (Friability) and,
b) the potential for exposure.

3. Asbestos Limitation

3.1 Scope of Services

This Hazmat Register ("**the Register**") will be prepared in accordance with the details set out in this contract between the Client and EHO Consulting Pty Ltd ACN 620 205 192 ("**EHOC**").

3.2 Scope of Services

The Scope of Services may have been limited by a range of factors such as time, budget, access and/or site disturbance constraints and these factors will be set out in the Register provided by EHOC to the Client.

3.3 Reliance on data

In preparing this report, EHOC has relied upon data, surveys, analyses, designs, plans and other information provided by the Client and associated individuals and organisations which are referred to in this report ("**the Data**").

Unless otherwise stated in the report, EHOC has not verified the accuracy or completeness of the Data to the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report ("**Conclusions**") are based on the whole or part of the Data so supplied by the Client then the Conclusions set out in this report are contingent upon the accuracy and completeness of the Data.

In addition to the information provided by the Client to EHOC, EHOC will not be liable in the future in any way in relation to incorrect Conclusions should any Data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to EHOC by the Client.

3.4 Report for the benefit of Client

The report has been prepared for the benefit of the Client and no other party. EHOC assumes no responsibility and will not be liable to any other person or organisation for or in relation to any matter dealt with or Conclusions expressed in the Report, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in the Report (including without limitation matters arising from any negligent act or omission of EHOC or for any loss or damage suffered by any other party in relying upon the matters dealt with or Conclusions expressed in the Report). Other parties should not rely upon the report or the accuracy or completeness of any Conclusions and should make their own enquiries and obtain independent advice in relation to such matters.

3.5 Other limitations

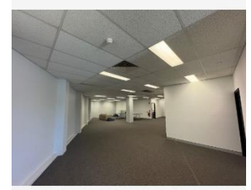
EHOC will not be liable to update or revise the report to take into account any events, emergent circumstances or facts occurring or becoming apparent after the date of the Report.

The Scope of Services did not include any assessment of the title to nor ownership of the properties, buildings and structures referred to in the report, nor the application or interpretation of laws in the jurisdiction in which those properties, buildings and structures are located.

The Scope of Services encompasses the totality of the work that will be completed by EHOC.

4. Survey findings

Table 3 – Hazardous Materials Register

Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
Building Description: The building is a 2-storey office block with brick external walls and pebble Crete cladding to the facade of the building, concrete flooring throughout. The building's interior consists mostly of plaster walls and fitted carpets with limited access above a suspended ceiling and under the fitted carpets								
1.1 North staircase	Internal mill board to fire door	A1	NAD	1 unit	F	NA	1985 installation. No further action required.	
1.1 North staircase	Blue paint on hand rails	L1	0.0003	<10sqm	NA	NA	No further action required.	
1.1 North staircase	New fluorescent ceiling lights	-	-	-	-	-	No further action required.	
1.2 Wreck room	Suspended ceiling tiles	SMF01	Presumed SMF	TH	F	Low	This item is present throughout the 1st floor in every room. Remove under controlled conditions prior or during demolition by competent persons.	

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Material Identification			Risk Assessment				Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
1.2 Wreck room	Grey wall paint	L2	<0.01%	90sqm	NA	NA	No further action required.	
1.2 Wreck room	RIC LE1 EB, 1978 capacitor to ceiling fluorescent lights	PCB01	NON-PCB	TH	NA	NA	Found in ANZECC 1997 as non-PCB type. This item is found throughout the 1st floor	
1.2 Wreck room	Carpet underlay	A2	NAD	TH	F	NA	This item was found throughout the 1st floor where accessible. No further action required.	
1.2 Wreck room	Mastic wall movement joint to north east wall	A3	NAD	<1sqm	NF	NA	The room consists of plaster walls, fitted carpets. No further action required.	
1.2 Wreck room, ceiling space	Sprayed insulation to ceiling and structures above suspended ceiling tiles	A4	NAD, SMF	TH	F	Medium	This item is found throughout the ceiling space on level 1. The item contains synthetic mineral fibre. It is recommended to remove under controlled conditions by competent persons during or prior to demolition.	

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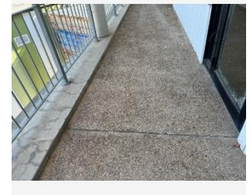
Material Identification			Risk Assessment				Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
1.2 Wreck room, ceiling space	Insulation to flexible air ducts	SMF02	Presumed SMF	TH	F	Negligible	This item is found throughout the ceiling space on level 1. Remove under controlled conditions prior or during demolition by competent persons.	
1.3 Offices	White paint under windows	L3	<0.01%	30sqm	NA	NA	No further action required. Plaster panels above windows	
1.4 Balcony	Eaves north end	A5	NAD	35sqm	NF	NA	No further action required	
1.4 Balcony	Eaves south end	A6	NAD	35sqm	NF	NA	No further action required	-
1.4 Balcony	Floor mastic movement joint	A7	NAD	<1sqm	NF	NA	No further action required	

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Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
1.5, disused office	Sprayed vermiculite to ceiling	A8	NAD	17sqm	F	NA	Appears to be a repair patch. No further action required	
1.5, disused office	Sprayed insulation to ceiling and structures above suspended ceiling tiles	A9	NAD, SMF	TH	F	Medium	The item contains synthetic mineral fibre. It is recommended to remove under controlled conditions by competent persons during or prior to demolition.	
1.5, disused office	Mastic wall movement joint to north east wall	A10	NAD	<1sqm	NF	NA	No further action required	
1.5, disused office	White on grey wall paint	L4	<0.01%	TH	NA	NA	No further action required. Found throughout the 1st floor	-
1.5, disused office	Wall sarking to upper glass panels above ceiling space	SMF03	Presumed SMF	15sqm	F	Negligible	Remove under controlled conditions prior or during demolition by competent persons.	

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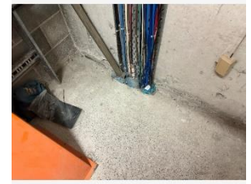
Material Identification			Risk Assessment				Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
1.6 Plant rooms	Presumed asbestos fuse box	P1	Presumed Asbestos	1 unit	NF	Negligible	Inaccessible, live unit. Assess by a competent person prior to demolition. Until such time presumed to contain asbestos.	
1.6 Plant rooms	Electrical conduit pillows	SMF04	Presumed SMF	2 units	F	Negligible	Remove under controlled conditions prior or during demolition by competent persons.	
1.6 Plant rooms	Wall mounted fluorescent light capacitors	PCB02	Presumed PCB	2 units	NA	Negligible	Live units, no access internal. Dispose of in accordance with EPA requirements.	
1.6 Plant rooms	Mastic seal to metal ventilation ducts	A11	NAD	<1sqm	NF	NA	No further action required	
1.6 Plant rooms	Air handling units not accessible internally	-	Presumed Hazmat	-	-	-	Not accessible at the time of inspection. Inspect by a competent person prior to demolition	

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Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
1.7 Balcony	Pink wall paint	L5	<0.01%	50sqm	NA	NA	No further action required.	
1.7 Balcony	Pink painted eaves	A12	NAD	25sqm	NF	NA	No further action required	
1.7 Balcony	Rubber gaskets to pipes in services access	-	-	-	-	-	No further action required.	
1.8 Kitchen	Vinyl flooring	A13	NAD	<10sqm	NF	NA	No further action required	
1.9 Roof	White paint on metal pipes	L6	<0.01%	10 LM	NA	NA	No further action required. Metal clip lock roof panels. No access doe to safety	

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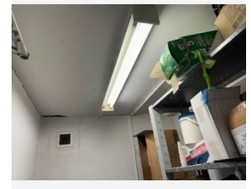
Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
1.9 Roof	Presumed cowl to exhaust pipe on roof	P2	Presumed Asbestos	2 units	NF	Negligible	Inaccessible for close inspection. Inspect by a competent person prior to demolition	
1.9 Roof	No access internal to cooling tower	-	Presumed Hazmat	-	-	-	Not accessible at the time of inspection. Inspect by a competent person prior to demolition.	
1.10 Bathrooms	Internal insulation to boiler	SMF11	**Presumed SMF**	1 unit	NF	Negligible	Tiled walls, solid floor and walls, wooden toilet cubical. Inspect by a competent person prior to demolition. No access inside service ducts	
LG.01 Lower ground Amenities	Inaccessible fluorescent ceiling lights	PCB03	Presumed PCB	TH	NA	Negligible	Inspect by a competent person prior to demolition. Dispose of in accordance with EPA requirements.	
LG.01 Lower ground Amenities	Generator internals	P3	Presumed Asbestos	1 unit	F	Negligible	Inspect by a competent person prior to demolition. Assess by a competent persons prior to demolition. Until such time presumed to contain asbestos.	

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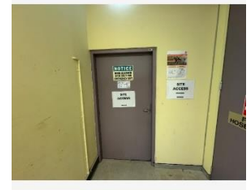
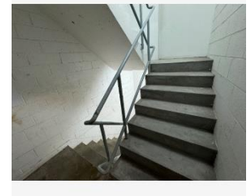
Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
LG.01 Lower ground Amenities	Mastic wall movement joint to north east wall	A10/R1	NAD	<1sqm	NF	NA	No further action required	
LG.01 Lower ground Amenities	Presumed backing board to fuse box by fire stairs	P4	Presumed Asbestos	1 unit	NF	Negligible	Assess by a competent persons prior to demolition. Until such time presumed to contain asbestos.	
LG.01 Lower ground Amenities	Hoist no 1	-	Presumed Hazmat	-	-	-	Not accessible at the time of inspection. Inspect by a competent person prior to demolition. Inspect by a competent person prior to demolition	
LG.01 Lower ground Amenities	Internal mill board to fire door	A1/R1	NAD	1 unit	F	NA	No further action required	
LG.01 Lower ground Amenities	Blue paint on hand rails	L1/R1	<0.01%	<10sqm	NA	NA	No further action required.	

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Material Identification			Risk Assessment				Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
LG.02 Office area	Suspended ceiling tiles	SMF05	Presumed SMF	TH	F	Low	Remove under controlled conditions prior or during demolition by competent persons.	
LG.02 Office area	Insulation to flexible air ducts	SMF06	Presumed SMF	TH	F	Negligible	Remove under controlled conditions prior or during demolition by competent persons.	
LG.03 Workshop and store	New vinyl flooring	-	-	-	-	-	Toilets contained concrete floor and walls with ceramic tiles and wooden partition walls. Inspect by a competent person prior to demolition	
G.01 Fire stairs	Internal mill board to fire door	A1/R2	NAD	1 unit	F	NA	No further action required	-
G.01 Fire stairs	Blue paint on hand rails	L1/R2	<0.01%	<10sqm	NA	NA	No further action required.	-

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Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
G.02 Lunchroom	Yellow on pink wall paint	L7	<0.01%	TH	NA	NA	No further action required.	
G.02 Lunchroom	Suspended ceiling tiles	SMF07	Presumed SMF	TH	F	Negligible	Remove under controlled conditions prior or during demolition by competent persons.	
G.02 Lunchroom	Ceiling mounted fluorescent lights	PCB04	Presumed SMF	TH	NA	Negligible	Remove under controlled conditions prior or during demolition by competent persons.	
G.02 Lunchroom	Flexible air ducts above suspended ceiling	SMF08	Presumed SMF	TH	F	Negligible	Remove under controlled conditions prior or during demolition by competent persons.	-
G.03 Stone art, CRS computers	Inaccessible locked	-	Presumed Hazmat	-	-	-	Not accessible at the time of inspection. Inspect by a competent person prior to demolition	-

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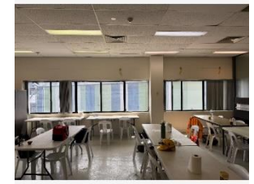
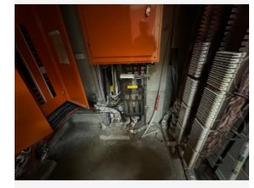
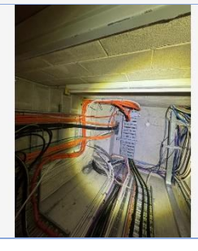
Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
G.04 DCS Contractor	Inaccessible locked	-	Presumed Hazmat	-	-	-	Not accessible at the time of inspection. Inspect by a competent person prior to demolition	-
G.05 Lunchroom 2	Cream wall paint	L8	<0.01%	TH	NA	NA	No further action required.	
G.06 Plant rooms	Presumed fuse backing board	P5	Presumed Asbestos	3 units	NF	Negligible	Assess by a competent persons prior to demolition. Until such time presumed to contain asbestos.	
G.06 Plant rooms	Pipe insulation	SMF09	Presumed SMF	5LM	F	Low	Remove under controlled conditions prior or during demolition by competent persons.	
G.06 Plant rooms	Insulation pillows to pipe in ceiling	SMF10	Presumed SMF	2 units	F	Negligible	Remove under controlled conditions prior or during demolition by competent persons.	

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Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
G.06 Plant rooms	Mastic seal to metal ventilation ducts	A11/R1	NAD	<1sqm	NF	NA	No further action required	
G.06 Plant rooms	Air handling units not accessible internally	-	Presumed Hazmat	-	-	-	Not accessible at the time of inspection. Inspect by a competent person prior to demolition	
G.07 Office	Presumed fuse backing board	P6	Presumed Asbestos	1 unit	NF	Negligible	Assess by a competent persons prior to demolition. Until such time presumed to contain asbestos.	
B.01 Basement	Ceiling mounted fluorescent lights	PCB5	Presumed SMF	TH	NA	Negligible	Inspect by a competent person prior to demolition. Remove under controlled conditions prior or during demolition by competent persons.	-
B.01 Basement	Light motor room inaccessible	-	Presumed Hazmat	-	-	-	Not accessible at the time of inspection. Inspect by a competent person prior to demolition	

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Material Identification		Risk Assessment					Risk Management & Corrective Actions	Photo
Location of Material	Description	Sample No.	Hazmat Detected / Identified	Quantity sqm, Lm, Unit	Friability	Risk Rating (H,M,L,N)		
B.01 Basement	Mastic seal to ventilation duct	A16	NAD	<1sqm	NF	NA	No further action required	
External	Mastic wall movement joint to north east wall	A14	NAD	<1sqm	NF	NA	No further action required	
External	Floor bitumen movement joint	A15	NAD	<1sqm	NF	NA	No further action required	

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5. Marked Plans

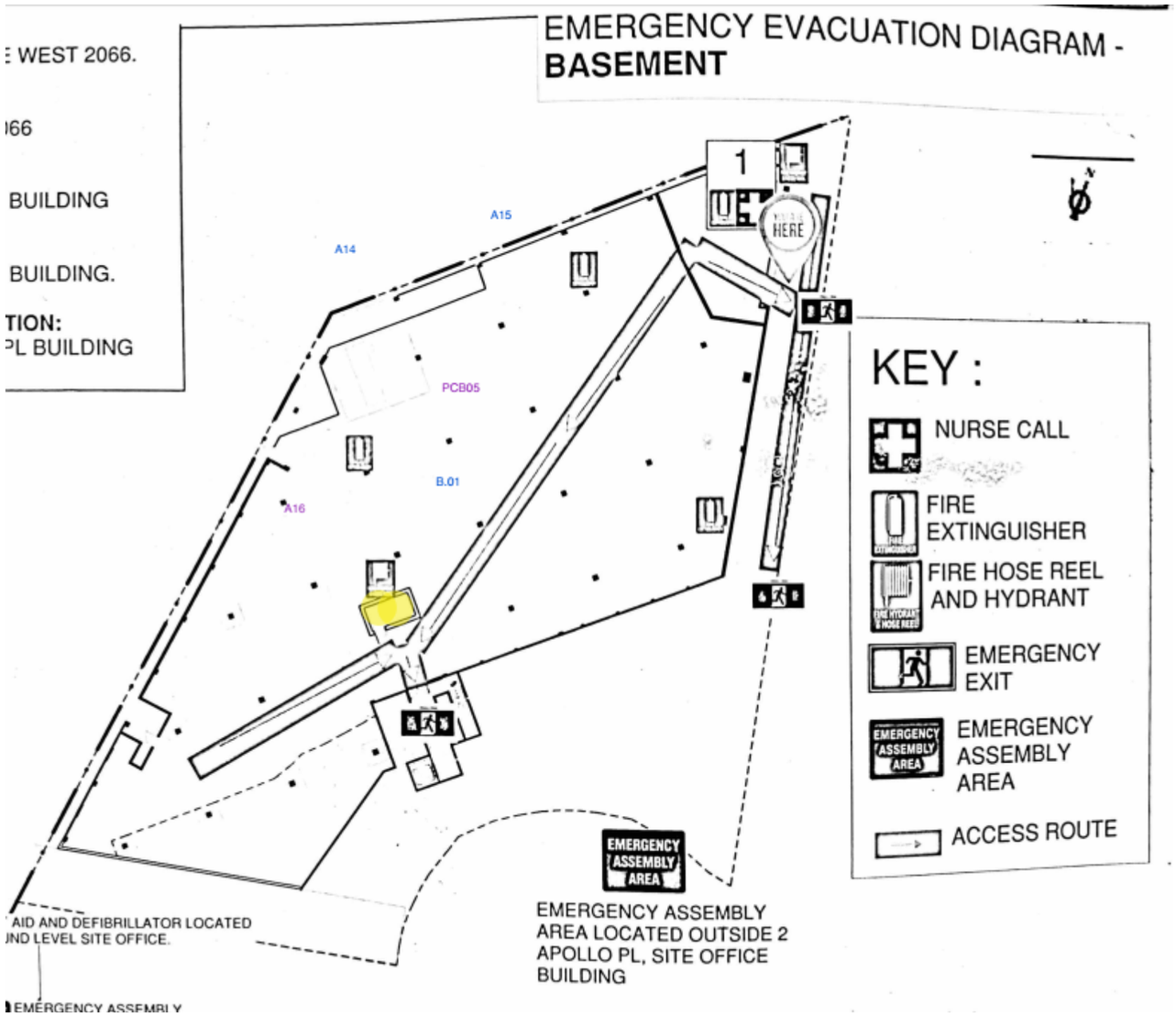

Figure 1 - Depicts site plan and sample location basement

Key

Inaccessible Area | Area Containing Presumed Asbestos | Area Containing PCB | Area Containing SMF

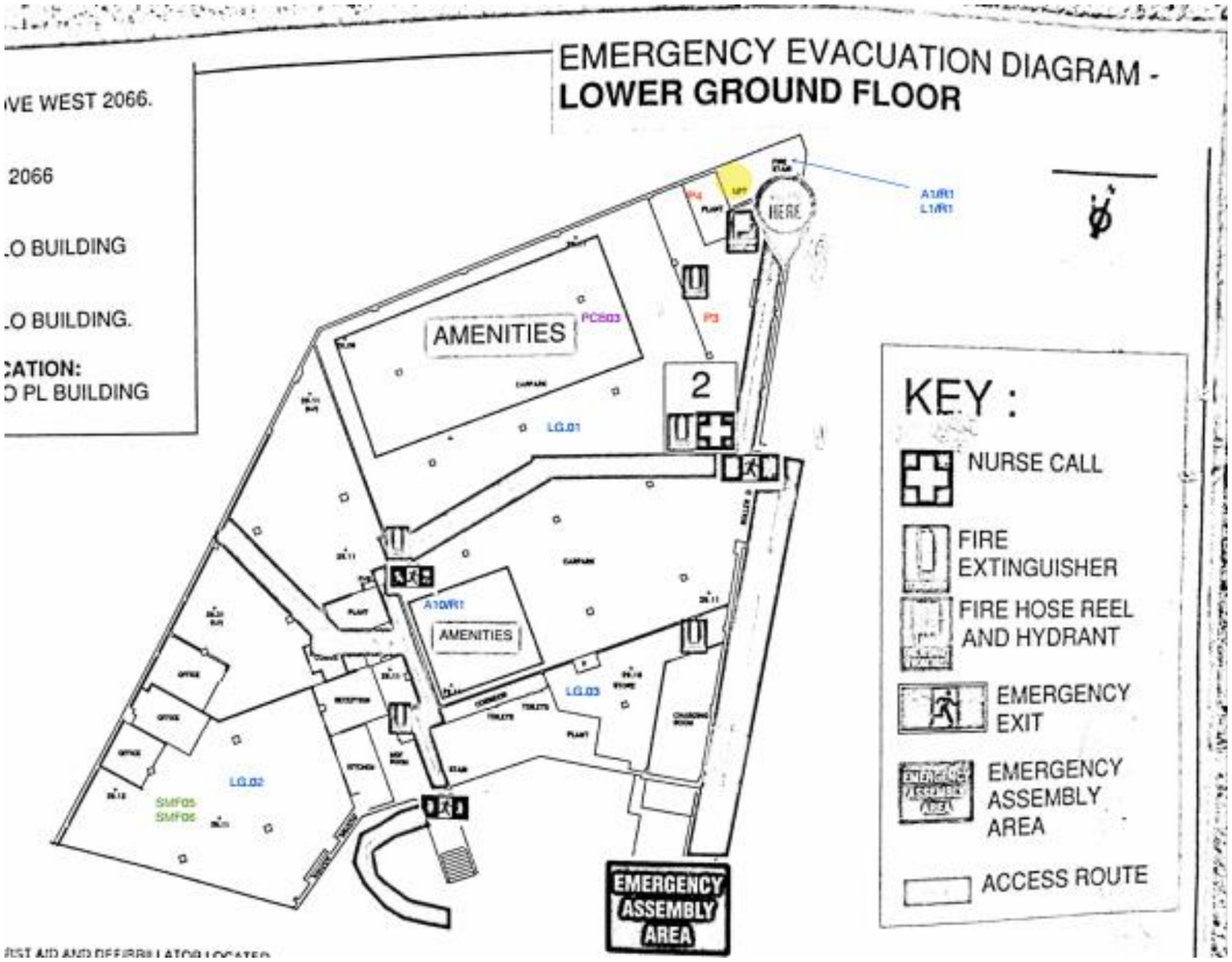

Figure 2 - Depicts site plan and sample location lower ground

Key
Inaccessible Area Area Containing Presumed Asbestos Area Containing PCB Area Containing SMF

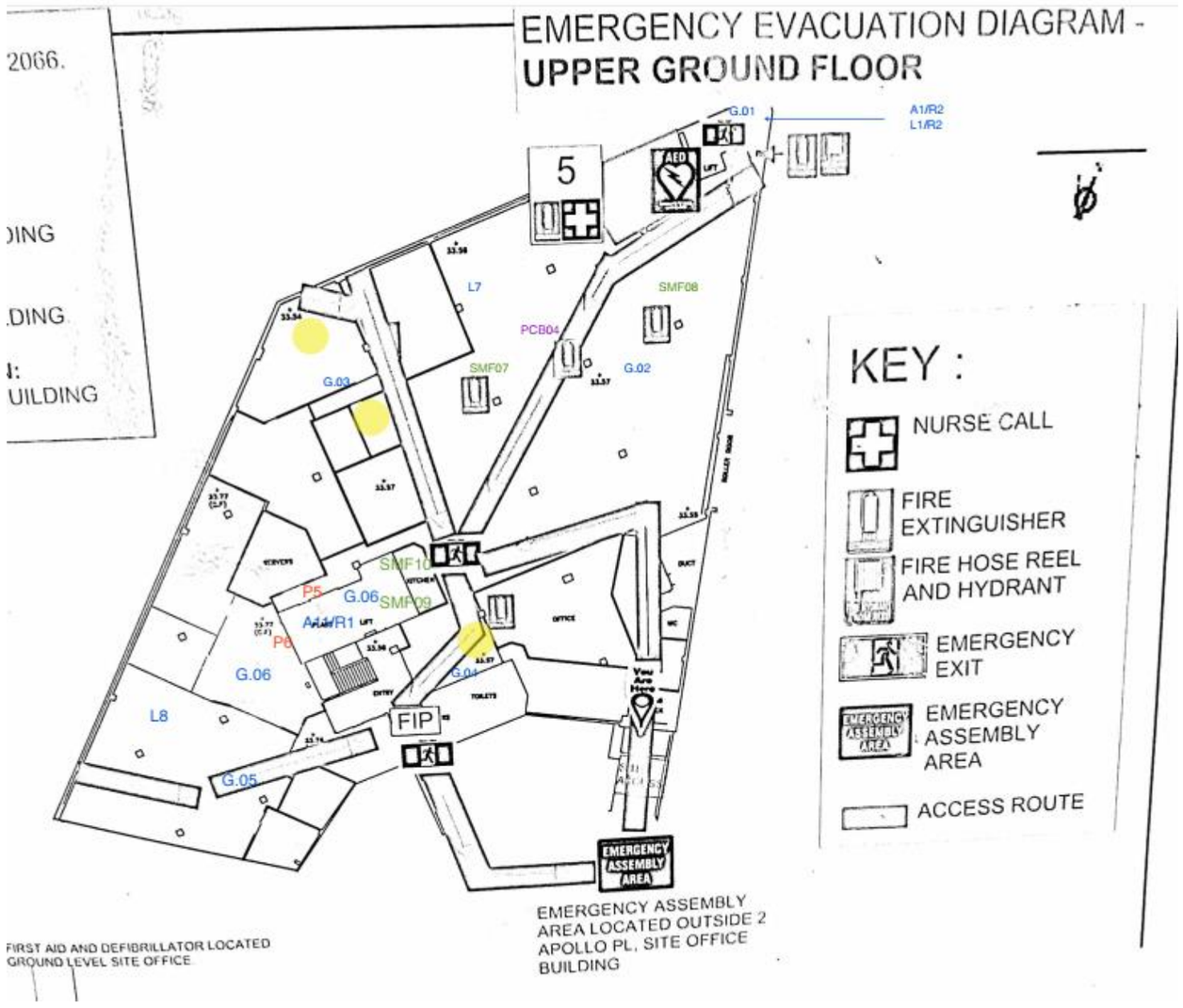

Figure 3 - Depicts site plan and sample location upper ground

Key
Inaccessible Area Area Containing Presumed Asbestos Area Containing PCB Area Containing SMF

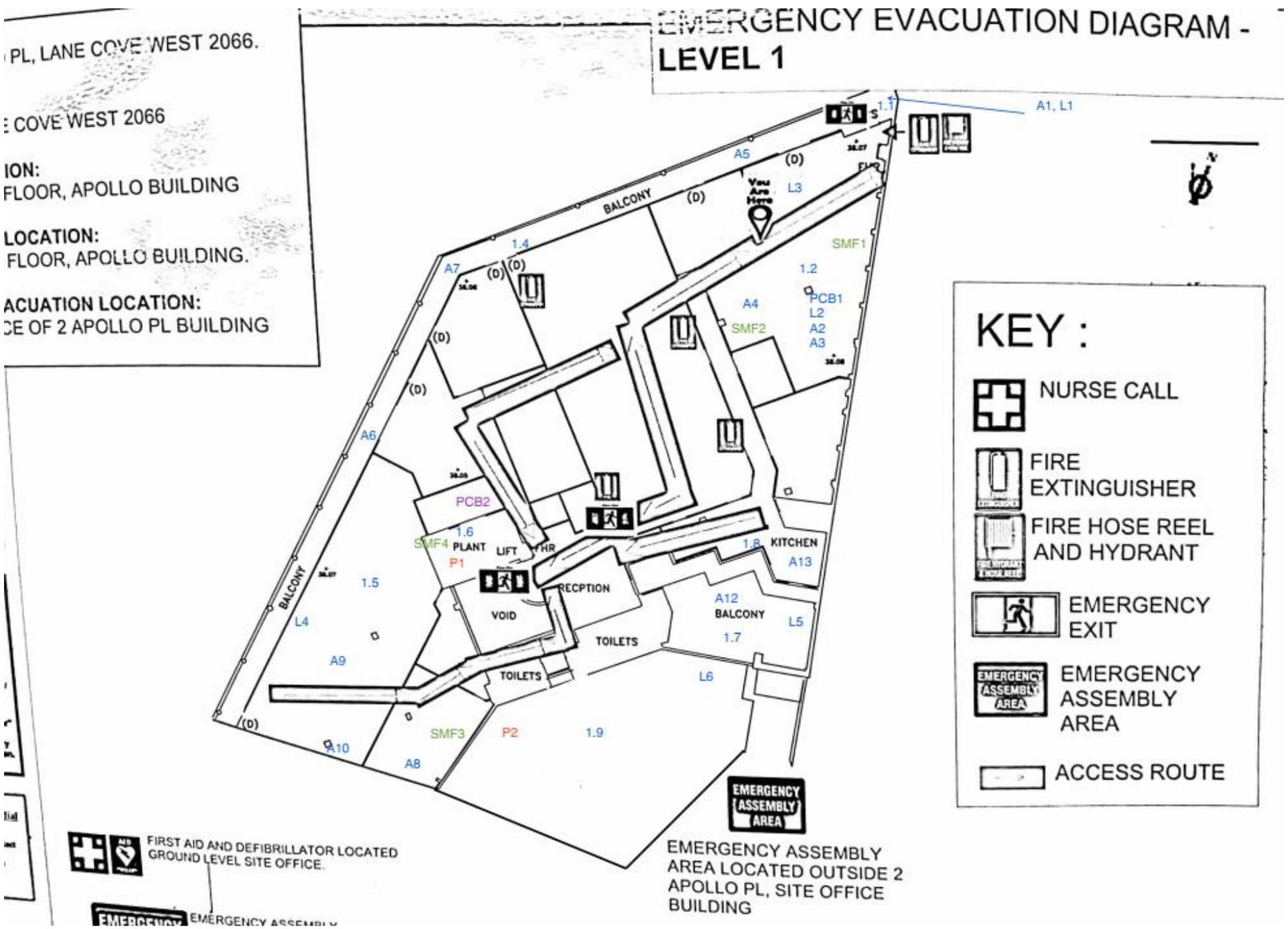

Figure 4 - Depicts site plan and sample location 1st floor

Key
Inaccessible Area Area Containing Presumed Asbestos Area Containing PCB Area Containing SMF

Appendix A – Qualitative Risk Matrix

Table 4 – Condition and Disturbance Assessment

Condition		
1	GOOD	NO OBVIOUS DETERIORATION, SECURED IN PLACE, SEALED AND ENCAPSULATED.
2	LOW DAMAGE	SCRAPES AND SCTARCHES, ENCAPSULATED
3	FAIR	MINOR DAMAGE OR DETERIORATION, NOT SEALED OR ENCAPSULATED
4	MODERATE	MAJOR DAMAGE THROUGHOUT, NO DEBRIS OR DUST, NOT BE SEALED / ENCAPSULATED
5	POOR	OBVIOUS DAMAGED OR DETERIORATION, EXTENSIVE DUST AND CONTAMINATION
Accessibility		
1	INACCESSIBLE	NOT ACCESSIBLE BUT VISIBLE
2	UNLIKELY	DISTURBANCE UNLIKELY DURING TYPICAL OCCUPATION OF THE BUILDING
3	POSSIBLE	DISTURBANCE UNLIKELY DURING TYPICAL OCCUPANCY OF THE BUILDING HOWEVER MAY OCCUR DURING MAINTENANCE WORKS
4	LIKELY	DISTURBANCE MAY OCCUR DURING TYPICAL OCCUPANCY OF THE BUILDING AND IS LIKELY DURING MAINTENANCE WORKS
5	CERTAIN	VERY LIKELY TO OCCUR DUE HIGHT AND TRASIT ROUT

Table 5 – Risk Assessment Chart

Material Condition		Probability of Disturbance				
		Inaccessible	Unlikely	Possible	Likely	Certain
		1	2	3	4	5
Good	1	2	3	4	5	6
Low	2	3	4	5	6	7
Fair	3	4	5	6	7	8
Moderate	4	5	6	7	8	9
Poor	5	6	7	8	9	10

LEGEND: 1-3 NEGLIGIBLE 4-5 LOW RISK 6-7 MEDIUM RISK 8-10 HIGH RISK

Appendix B – Legislative Requirements

Table 6 – Australian legislative requirements

STATE Primary Asbestos Legislation	Asbestos Survey Requirements	Asbestos Documentation Review Requirements	Reporting Requirements	Supporting Documentation
COMMONWEALTH **Work Health & Safety Act 2011** **Work Health & Safety Regulations 2011** ***Chapter 8 – Asbestos*** https://www.safeworkaustralia.gov.au/safety-topic/hazards/asbestos/resources	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. Work Health and Safety (How to Safely Remove Asbestos Code of Practice) Approval 2020 AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
AUSTRALIAN CAPITAL TERRITORY **Work Health & Safety Act 2011** **Work Health & Safety Regulations 2011** ***Chapter 8 – Asbestos*** https://www.worksafe.act.gov.au/laws-and-compliance/codes-of-practice	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. Work Health and Safety (How to Safely Remove Asbestos Code of Practice) Approval 2020 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
NEW SOUTH WALES **Work Health & Safety Act 2011** **Work Health & Safety Regulations 2017** ***Chapter 8 – Asbestos*** https://www.safework.nsw.gov.au/hazards-a-z/asbestos	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. NSW Government Code of Practice – How to Manage and Control Asbestos in the Workplace 2022. How to Safely Remove Asbestos: Code of Practice 2022. Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
NORTHERN TERRITORY **Work Health & Safety (National Uniform Legislation) Act 2011** **Work Health & Safety (National Uniform Legislation) Regulations 2011**	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. Work Health and Safety (How to Safely Remove Asbestos Code of Practice) Approval 2020 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)]

STATE Primary Asbestos Legislation	Asbestos Survey Requirements	Asbestos Documentation Review Requirements	Reporting Requirements	Supporting Documentation
Chapter 8 – Asbestos https://asbestos.nt.gov.au/general-information/legislation-and-codes-of-practice	A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.		Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
QUEENSLAND **Work Health & Safety Act 2011** **Work Health & Safety Regulations 2011** ***Chapter 8 – Asbestos*** https://www.asbestos.qld.gov.au/general-information/legislation-and-codes-practice	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. WHSQ How to manage and control asbestos in the workplace Code of Practice 2021 WHSQ How to Safely Remove Asbestos Code of Practice 2021 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
SOUTH AUSTRALIA **Work Health & Safety Act 2012** **Work Health & Safety Regulations 2012** ***Chapter 8 – Asbestos*** https://www.safework.sa.gov.au/workplaces/codes-of-practice#COPs	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified. An asbestos register is not required if building was constructed after 31 December 2003.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2020. Gov. of South Australia - How to Safely Remove Asbestos Code of Practice 2020 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
TASMANIA **Work Health & Safety Act 2012** **Work Health & Safety Regulations 2012** ***Chapter 8 – Asbestos*** https://worksafe.tas.gov.au/asbestos	Person who manages or controls a workplace must ensure, so far is reasonably practicable, that all asbestos present under their management or control is identified by a ***competent person***. If sampling is to be conducted must be NATA accredited laboratory. A written Asbestos Management Plan (AMP) is required if asbestos is identified at the workplace. An asbestos register is to be kept at the workplace.	Asbestos Management Plan (AMP) & Asbestos Register are to be kept current. Should be reviewed at least once every 5 years.	AMP must include information identification of asbestos, decisions on management of identified materials, as well as procedures for detailing incidents and emergencies with regard to asbestos and consolation, responsibility and training of persons who will be involved with asbestos works. Asbestos register is to contain details of the location, type and condition asbestos materials plus date asbestos was identified.	Safe Work Australia Code of Practice - How to Manage and Control Asbestos in the Workplace 2018. Safe Work Australia Code of Practice – How to Safely Remove Asbestos 2018 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021

STATE Primary Asbestos Legislation	Asbestos Survey Requirements	Asbestos Documentation Review Requirements	Reporting Requirements	Supporting Documentation
			An asbestos register is not required if building was constructed after 31 December 2003.	Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
VICTORIA **Occupational Health & Safety Act 2004** **Occupational Health and Safety Regulations 2017** – ***Part 4.4 - Asbestos*** **https://www.worksafe.vic.gov.au/asbestos**	Person who manages or controls a workplace must ensure, so far is reasonably practicable, identify all asbestos present that is under their management or control. Must determine the location, type, friability condition and likelihood of ACM sustaining damage or deterioration. Division 6 requires that prior to any demolition or refurbishment works, the person who manages or controls the workplace must review the asbestos register and revise if it is inadequate in regard to the planned works.	Undertake review and revision of risk assessment when condition of asbestos changes, remedial work has been carried out or the assessment is no longer valid. At least once every 5 years.	Reports must include the type, location, friability & condition of asbestos, Identification of inaccessible areas and risk assessment including dates.	Work Safe Victoria Compliance Code – Managing Asbestos in Workplaces 2019 Work Safe Victoria Compliance Code – Removing Asbestos in Workplaces 2019 AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.
WESTERN AUSTRALIA **Occupational Safety and Health Act 1984** **Occupational Health and Safety Regulations 1996** ***Division 4 - Further requirements in relation to certain hazardous substances. Subdivision 1 – Asbestos. Regulation 5.43*** **https://www.commerce.wa.gov.au/worksafe/occupational-safety-and-health-act-and-regulations**	Employer, main contractor, self-employed person or person having control of the workplace to ensure that presence and location of asbestos at the workplace is identified. The process of identification and assessment of risks arising from asbestos hazards are to be conducted in accordance with the Code of Practice for the Management and Control of Asbestos in Workplaces [NOHSC: 2018 (2005)].	Annual review of register and management plan under NOHSC: 2018(2005). A visual inspection of ACM should be undertaken as part of any review.	Under NOHSC:2018(2005): Maintain a register on the premises which includes date of assessment, location & types of asbestos, analysis, risk assessments, control measures, and details of competent person who undertook the assessment. Details of presumptions made and likely asbestos in inaccessible areas to be included	Health (Asbestos) Regulations 1992 Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC: 2002 (2005)] Code of Practice for the Management and Control of Asbestos in Workplaces [NOHSC:2018 (2005)] Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition [NOHSC:3003(2005)] Health and Safety Executive (UK), HSG264 (2nd Edition), Asbestos: The survey guide 2012; Health and Safety Executive (UK) HSG248 (2nd Edition), Asbestos: The Analysts Guide for Sampling, Analysis and Clearance Procedures 2021 Health and Safety Executive (UK), HSG227, A comprehensive guide to Managing Asbestos in premises, 2002; AS 4361.2 'Guide to lead Paint Management, Part 2: Commercial and Residential Buildings' (1998) Guide to Hazardous Paint Management Part 2: Lead Paint in residential, public and commercial buildings [AS 4361.2:2017]. AIOH positional paper: Synthetic Mineral Fibres and Occupational Health Issues 2011 National Standard for Synthetic Mineral Fibres [NOSHC:1004 (1990)]. ANZECC (1997) Identification of PCB-containing Capacitors: An information booklet for Electricians and Electrical Contractors.

Appendix C – Analysis certificates

SYDNEY ANALYTICAL LABORATORIES

Office:
PO BOX 48
ERMINGTON NSW 2115

Laboratory:
1/4 ABBOTT ROAD
SEVEN HILLS NSW 2147
Telephone: (02) 9838 8903
Fax: (02) 9838 8919
A.C.N. 003 614 695
A.B.N. 81 829 182 852
NATA No: 1884

ANALYTICAL REPORT for:

EHO CONSULTING

16/380 PENNANT HILLS RD
PENNANT HILLS 2020

ATTN: FAZ JALALI

JOB NO: SAL28830J

CLIENT ORDER: JN04987

DATE RECEIVED: 13/03/24

DATE COMPLETED: 15/03/24

TYPE OF SAMPLES: PAINTS

NO OF SAMPLES: 8

NATA Accredited for compliance with ISO/IEC 17025 Testing

.....
Issued on 15/03/24
Lance Smith
(Chief Chemist)

ANALYTICAL REPORT

JOB NO: SAL28830J
CLIENT ORDER: JN04987

	SAMPLES	Pb %
1	L1	0.03
2	L2	<0.01
3	L3	<0.01
4	L4	<0.01
5	L5	<0.01
6	L6	<0.01
7	L7	<0.01
8	L8	<0.01

MDL	0.01
Method Code	A8
Preparation	P1

DATE OF COLLECTION: 06/03/24
SITE: 2 APOLLO PLACE

ANALYTICAL REPORT

JOB NO: SAL28830J
CLIENT ORDER: JN04987

METHODS OF PREPARATION AND ANALYSIS

The tests contained in this report have been carried out on the samples as received by the laboratory. In the case where an analyte or group of analytes are received outside of recommended holding times, the analysis will proceed and the report annotated. Analysis is carried out within analyte holding times where possible.

P1	Analysis performed on sample as received
A8	Total Lead in Paint/Dust - In House Method A8 Determined by APHA 3111B (Flame AAS)

EHO CONSULTING
ENVIRONMENTAL HAZMAT OCCUPATIONAL

EHO Consulting Pty Ltd
16/380 Pennant Hills Rd
Pennant Hills, NSW 2120

ABN 49 620 205 192
www.ehoc.com.au
info@ehoc.com.au

Job Number: JN04987
Lab Number: LN08479
Client: EMKC AUSTRALIA PTY LTD
Contact: Pawan Lala - pawan.lala@emkc3.com
Client Address: Chartered Accountants House Level 11 37 York StSYDNEY 2000

Requested by: EMKC AUSTRALIA PTY LTD
Sample Date: Wednesday 6 March 2024
Sampled By: Faz Jalali
Date Received: Thursday 7 March 2024
Date Analysed: Monday 11 March 2024

Asbestos Certificate of Analysis
AS4964 (2004) Method for the Qualitative Identification of Asbestos in Bulk Samples

Site address: 2 Apollo Place, Lane Cove West NSW, Australia 2066

Asbestos samples have been examined at EHO Consulting (EHOC) Sydney Laboratory, 16/380 Pennant Hills Rd, Pennant Hills, NSW 2120. Analysis undertaken is a qualitative identification of asbestos fibres in bulk and soil samples by polarised light microscopy, including dispersion staining, in accordance with AS4964 (2004) Method for the qualitative identification of asbestos in bulk samples and EHOC's Asbestos Bulk Soil ID Standard Operating Procedure (CD38) and NATA Accreditation **No# 20381**, . Trace analysis carried out on all non-homogenous samples. Accredited for compliance with ISO/IEC: 17025-Testing. NATA is a signatory to the ILAC Mutual Recognition Arrangement for the mutual recognition of the equivalence of testing, medical testing, calibration, inspection, proficiency testing scheme providers and reference materials producers reports and certificates

LAB ID NUMBER	SAMPLE NUMBER	DESCRIPTION	LOCATION	SAMPLE DIMENSIONS	RESULT	COMMENTS
LIN01	A1	Millboard		1g	NAD, OF	NA
LIN02	A2	Carpet Underlay		1g	NAD, OF	NA
LIN03	A3	Mastic		1g	NAD, OF	NA
LIN04	A4	Sprayed Insulation		8g	NAD, SMF	NA
LIN05	A5	Cement		2g	NAD, OF	NA
LIN06	A6	Cement		3g	NAD, OF	NA
LIN07	A7	Glue		1g	NAD, OF	NA
LIN08	A8	Vermiculite		5g	NAD, OF	NA
LIN09	A9	Sprayed Insulation		6g	NAD, SMF	NA
LIN10	A10	Mastic		2g	NAD, OF	NA
LIN11	A11	Mastic paint		2g	NAD, OF	NA
LIN12	A12	Cement		2g	NAD, OF	NA
LIN13	A13	Thermoplastic tiles		2g	NAD, OF	Sample consists of grey patterned vinyl sheeting with black backing.
LIN14	A14	Mastic		1g	NAD, OF	NA

LAB ID NUMBER	SAMPLE NUMBER	DESCRIPTION	LOCATION	SAMPLE DIMENSIONS	RESULT	COMMENTS
LIN15	A15	Bitumen		1g	NAD, OF	NA
LIN16	A16	Mastic paint		<1g	NAD, OF	NA

Key:

NAD - No Asbestos Detected, CH - Chrysotile Asbestos Detected, AM - Amosite Asbestos Detected, CR - Crocidolite Asbestos Detected, UMF - Unknown Mineral Fibres Detected, SMF - Synthetic Mineral Fibres Detected, OF - Organic Fibres Detected, Trace - Trace Asbestos Detected, * - No trace asbestos detected at the reporting limit of 0.1 g/kg

Limitations

The results contained in this report relate only to the sample/s submitted for testing. The laboratory accepts no responsibility for location, sampling date, sample ID, sampler and client details provided. Results indicating "No asbestos detected" indicates a reporting limit specified in AS4964 -2004 which is 0.1g/ Kg (0.01%). Any amounts detected at assumed lower level than that would be reported, however those assumed lower levels may be treated as "No Asbestos Detected" as specified and recommended by A4964-2004. Loose asbestos fibres/ fibre bundles are detected and reported as handpicked fibres/ fibre bundles, and they do not represent respirable fibres. All non-homogenous samples such as dust and soils are subject to trace analysis, unless impractical to do so due to nature or size of the sample.

^Dust samples taken using a tape as sample collection method (Dust on Tape) are outside of NATA sample requirements and are not accredited under EHO's scope of accreditation.

If no asbestos is detected in vinyl tiles, mastics, sealants, epoxy resins and ore samples then confirmation by another independent analytical technique is advised due to the nature of the samples. EHO Group accepts no responsibility for the initial collection, packaging or transportation of samples submitted by a non EHO consultant / employee. This document may not be reproduced except in full.

Approved Analyst : **Mathew Sutton**

Date: 11-03-2024

Approved Signatory: **Mathew Sutton**

Date: 11-03-2024