Mr Alan Smith  
Manager, Standards and Innovations  
NSW Department of Education and Community  
Level 4  
35 Bridge Street  
Sydney NSW 2000

Dear Mr Alan Smith,

Cromer Public School - Inspection for Fibrous Cement Fragments in Grounds

1. Introduction

NAA Greencap was engaged by the NSW Department of Public Works to visit 4241-Cromer Public School, located on Carcoola Road, Cromer NSW 2099 to advise on management issues after the inspection of the external landscape areas of the student playground.

The areas discussed in this report are presented in the attached site layout plan, Figure 1-4241-Cromer Public School Plan.

NAA Greencap attended the site on Friday, 28 March 2014 and met with a representative from the Department of Public Works. An inspection was carried out and NAA Greencap is pleased to present below the findings and recommendations on management strategies.

2. General

Where control measures have been installed e.g. turfing, mulched garden beds, these areas should be subject to visual monitoring. Areas of hard standings will not require walk over inspections. The entire surface itself should also be subject to this (including all areas that have not been remediated). Visual monitoring should consist of simple walk-overs of the areas concerned, carried out by an appropriate person on the following occasions:

- at three monthly intervals
- after a period of heavy rain
- whenever damage or disturbance has been reported.

Should fibrous cement materials be observed, these should be removed and disposed by an appropriately licensed asbestos removal contractor. If such materials continue to be found (i.e. during successive inspections) appropriate surface remediation should be considered.
All asbestos remediation works are to be conducted when students and staff are not present at the school (i.e. after school, school holidays or weekends).

The asbestos work area should be clearly defined and access restricted to prevent unauthorised personnel entering that area. All entry points to the asbestos work area should be signposted or labelled in accordance with AS1319-1994 Safety Signs for the Occupational Environment.

All work should be carried out in accordance with the How to Safely Remove Asbestos: Code of Practice 2011 and the NSW Work Health and Safety Regulation 2011 made under NSW Work Health and Safety Act 2011. Handling and disposal of asbestos waste material should be carried out in accordance with NSW OEH Waste Classification Guidelines: Classifying Waste (December 2009).

Where surface treatment has been applied, this should be fully maintained at all times. For example, mulch levels should remain as per the original application, turf should be maintained to ensure full coverage and any other measures should be maintained in a good condition.

If you have any matters that you may wish to discuss regarding this letter, please do not hesitate to contact the undersigned on 02 9889 1800.

Yours sincerely

Paul Brown

Property Risk Consultant

Attachment A: Photographs

Attachment B: Figure 1

Attachment C: Statement of Limitations
3. Risk Assessment

Table 1  Findings and recommendations, 4241-Cromer Public School - April 2014.

<table>
<thead>
<tr>
<th>Area</th>
<th>Location description</th>
<th>Finding of inspection</th>
<th>Risk status</th>
<th>Management recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Landscape area between buildings A, B, D, I, E, H, &amp; J</td>
<td>The inspected location comprised of a mulched area centrally located between the buildings. No asbestos-containing cement fragments were observed during the visual inspection. Building rubble was observed during the visual inspection. Wood chip mulch was throughout the area on the ground surface, this was inspected as far as reasonably practicable.</td>
<td>Low</td>
<td>Any further excavation works should be done with the understanding that the soil may contain asbestos and personnel should be authorised and suitably trained to conduct the works. Work in the area should not be undertaken during school hours. Any fragments removed from the area should be disposed of as asbestos waste.</td>
</tr>
</tbody>
</table>

Table 2  Risk Assessment Factors

<table>
<thead>
<tr>
<th>Low risk</th>
<th>Asbestos materials that pose a low health risk to personnel, employees and the general public providing they remain undisturbed.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medium risk</td>
<td>Asbestos materials that pose a moderate risk to people in the area - there is a medium potential for the material to release asbestos fibres, if disturbed.</td>
</tr>
<tr>
<td>High risk</td>
<td>Asbestos materials that pose a high health risk to personnel or the public in the area of the material - there is a high potential for the material to release asbestos fibres, if disturbed.</td>
</tr>
</tbody>
</table>
Attachment A

Photographs
Photo 1: Looking south east towards buildings B & D

Photo 2: Looking south west towards buildings I & E

Photo 3: Looking south towards buildings I & E

Photo 4: Looking north west towards buildings J & H

Photo 5: Looking at some of the building debris throughout the mulched area

Photo 6: Looking at some of the building debris throughout the mulched area
Attachment B

Figure 1
Attachment C

Statement of Limitations
1. Limitations of an Asbestos materials inspection

1.1 Scope of services

This Asbestos materials inspection report ('the report') has been prepared in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and NAA Greencap ('scope of services'). In some circumstances the scope of services may have been limited by a range of factors such as time, budget, access and/or site disturbance constraints.

1.2 Reliance on data

In preparing the report, NAA Greencap has relied upon data, surveys, analyses, designs, plans and other information provided by the Client and other individuals and organisations, most of which are referred to in the report ('the data'). Except as otherwise stated in the report, NAA Greencap 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 in whole or part on the data, those conclusions are contingent upon the accuracy and completeness of the data. NAA Greencap will not be liable 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 NAA Greencap.

1.3 No inspection can be guaranteed to locate all Asbestos materials

In practice it is generally impossible to locate all Asbestos materials in the course of an inspection. This is because of factors such as:

- The need to avoid damage, such as when attempting to inspect behind wall panels or under carpets.
- Minimising inconvenience when premises or plant are in use whilst an inspection is being conducted.
- The availability of building/plant construction plans. There is no instrument which can detect hazardous materials.

The presence of Asbestos materials must be determined visually, as there is no single, cost effective instrument currently available for the purpose. Usually an inspector will take samples of suspect materials and have them analysed in a laboratory. Thus, any restrictions on the amount of sampling will reduce confidence in the hazardous materials inspection findings. The consequence of this is that hazardous materials which cannot be seen will not be found.

1.4 Asbestos materials are commonplace

From the early 1900s until the early 1970s, asbestos was widely used in the building industry. The use of asbestos cement sheets in roof pipes and wall cladding was particularly widespread, as was the use of 'limpet' asbestos fibre insulation in steel framed high-rise buildings. Asbestos was also used for applications such as insulation of pipes and high temperature electricity cables, in plastics, in PVC floor tiles, for reinforcement in cements, putties and mastic and in gaskets and friction materials.

Whilst major uses of hazardous materials were sometimes recorded on engineering drawings, there are few records of the ad hoc use of hazardous materials and products. To give examples from the building industry, plumbers frequently used asbestos fibre in caulking compounds and builders often used Asbestos Cement sheeting as packing under floorboards.

In short, asbestos could be almost anywhere in a building or plant constructed before the 1980s.

1.5 Reliance on a hazardous materials inspection

The client must not rely upon an inspection or report as indicating that a site or building is 'hazardous materials free'. All that the report can be relied upon to show is that no hazardous materials were found (or that only such hazardous materials were found as was reported to have been found) in the course of the inspection. The
findings of the report must be considered together with the specific scope and limitations of the type of inspection undertaken.

1.6 Report for benefit of client

The report has been prepared for the benefit of the Client and no other party. NAA Greencap 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 NAA Greencap or for any loss or damage suffered by any other party 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.

For the purposes of this limitations statement, ‘conclusions’ include statements, opinions, facts, information, conclusions and/or recommendations in the report.