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SUPPORT ADVISORY CONSULTING SERVICES

Pre-Demolition Hazardous Materials Inspection Report and Register, Narrabeen R.S.L.

Asbestos, Lead, SMF and PCBs

Narrabeen North, N.S.W

Presented to:
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10 January 2025

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Table 1: Document Version Control Register [Significant Changes Only]

Version Number	Date	Prepared By	Reviewed By	Summary of Changes
1.0	5 December 2024	J. North	J. North	Initial draft submitted to the client.
2.0	9 January 2025	J.North	G.Davis	Reviewed by Client
3.0				

116 Nareen Parade, Narrabeen North

GEOFF DAVIS
MANAGING DIRECTOR
RICK DAVIS CONTRACTING PTY LTD
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10 January 2025

Dear Geoff,

RE: Pre-Demolition Hazardous Materials Inspection Report and Register

Thank you for the opportunity to assist with the hazardous materials inspection of Narrabeen RSL. It has been a pleasure working with Rick Davis Contracting, and we appreciate your trust in JN OHEB Services to support this critical phase of the project.

This report provides a comprehensive overview of hazardous materials identified at the site, including a detailed register and recommendations for safe and compliant management during the demolition process. Our findings and recommendations aim to ensure that all activities align with relevant regulatory requirements and industry best practices, prioritising safety and environmental stewardship.

Should you require further assistance in implementing the recommendations, managing hazardous materials during demolition, or any additional services, please do not hesitate to reach out. We remain committed to supporting you in achieving a successful project outcome.

Thank you once again for the opportunity to contribute to your project.

Yours sincerely,

JN OHEB Services Pty Ltd

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Refer: Terms of Agreement

Contents

1. Executive Summary.

1.1 Purpose

The purpose of this report is to identify and document hazardous materials present at Narrabeen RSL, 116 Nareen Parade, Narrabeen North, to facilitate their safe removal prior to demolition. This pre-demolition survey aims to assist the client ensure compliance with regulatory requirements and protect the health and safety of workers and the surrounding community.

1.2 Scope

The inspection included all accessible areas of the site and focused on identifying materials such as asbestos, lead-based paint, synthetic mineral fibres (SMFs), and polychlorinated biphenyls (PCBs). Areas inaccessible during the inspection are outlined in **Section 4.3** and may require further assessment during demolition. No one section of this report should be read and/or used on its own, please refer all to sections of this report in its entirety.

1.3 Review of Findings

The inspection identified hazardous materials in various locations across the site. These materials require appropriate management and removal prior to demolition activities to ensure safety and compliance with regulations.

1.4 Summary

1.4.1 Summary of Identified Hazardous Materials: Asbestos

Table 2: Summary of Identified Hazardous Materials: Asbestos [Non-Friable]

Item (Section 7: Register)	Sample ID	Material Identified	Location	Asbestos Type	Action Required*
6.0	8788/A4	Beige Vinyl Tile	Sunk Bar, Room, Adjacent West of Male Toilet, Vinyl Tile, White/Beige	Chrysotile	Remove and Dispose
6.0	8788/A4	Black Adhesive	Sunk Bar, Room, Adjacent West of Male Toilet, Adhesive	Chrysotile	Remove and Dispose
8.0A	-	Beige Vinyl Tile	Room (external to Sauna), Vinyl Flooring, as per	Chrysotile	Remove and Dispose

Item (Section 7: Register)	Sample ID	Material Identified	Location	Asbestos Type	Action Required*
			above (8788/A4) White/Beige		
9.0	8788/A6	Beige fibre cement material	Sunk Bar, Room, East of the Cool Room, Water Heater, Base	Chrysotile	Remove and Dispose
10.0	8788/A7	Black Bituminous Material	Sunk Bar, Room, East of the Cool Room, Electrical Backing Board.	Chrysotile	Remove and Dispose
13.0	8788/A9	Red Vinyl Tile	Sunk Bar, Small Space, between Gym and Stairwell, Tile/s, Red	Chrysotile	Remove and Dispose
13.0	8788/A9	Black Adhesive	Sunk Bar, Small Space, between Gym and Stairwell, Tile/s, Red	Chrysotile	Remove and Dispose
37.0	8788/A23	Beige Vinyl Tile [Adhesive – Negative]	Main Foyer, Bar, Wall Tile, South of Beer Taps.	Chrysotile	Remove and Dispose
55.0	8788/A28	Beige fibre cement material	Balcony, Wall Cladding, (Locked) Storeroom, Southern side of Balcony (exterior to "No Entry" Room), Painted, Green/Grey	Chrysotile	Remove and Dispose
57.0	8788/A29	Grey fibre cement material	Roof, "Super Six" cement material, Extends from the Eastern Perimeter above the Poker Machines, West to the Main Foyer	Chrysotile, Amosite	Remove and Dispose
38.0	8788/A31	Beige fibre cement material	Main Foyer, Office to Strong Room, Ceiling Lining	Chrysotile, Amosite	Remove and Dispose

Item (Section 7: Register)	Sample ID	Material Identified	Location	Asbestos Type	Action Required*
39.0	8788/A32	Grey fibre cement material	Main Foyer, Office to Strong Room, Ceiling, Cornice	Chrysotile, Amosite	Remove and Dispose
40.0	8788/A34	Grey fibre cement material	Main Entrance, Exterior, Eaves, White	Chrysotile	Remove and Dispose
44.0	8788/A43	Grey fibre cement material	Main Entrance, Exterior, Eastern side of entry, Infill Panel	Chrysotile	Remove and Dispose
74.0	8788/A39	Grey fibre cement material	Ground beneath Balcony, Cement Sheeting Debris	Chrysotile, Amosite	Remove and Dispose
76.0	8788/A40	Bituminous Membrane	Beneath Balcony, External to Storage Cage [refer above, access via stairwell from Telephone Room], Base edge of concrete, Bituminous Material	Chrysotile	Remove and Dispose
79.0	8788/A41	Grey fibre cement material	"Whipper Snipper Garage", Southern Room, Garage, Western Wall, Sub-Floor (Access Hatch)	Chrysotile, Amosite	Remove and Dispose
28.0	8788/A44	Beige fibre cement material	Auditorium, Southern end above Kitchen Seating, above ceiling tiles, W-E Beam, Cement sheeting affixed to side of Beam. Beige	Chrysotile	Remove and Dispose

***In accordance with Appendix E, Regulatory References**

1.4.2 Summary of Identified Hazardous Materials: Lead

This table presents the results of lead content analysis in paint samples, relative to the threshold specified in AS 4361.2:2017 (Guide to Hazardous Paint Management in Residential and Commercial Buildings). The guide

identifies lead concentrations of **0.1% w/w or higher** as requiring specific management measures to mitigate health and environmental risks.

To enhance clarity:

- Results that **exceed 0.1% w/w** are highlighted in **bold red** to indicate they are above the actionable threshold.
- Results that are below 0.1% but round up to 0.1% (e.g., 0.074%) are highlighted in ***italicized orange*** to emphasize their proximity to the threshold. These results may still warrant attention during demolition or refurbishment activities.

It is important to note that **any detectable lead content should be managed carefully**, as improper removal can release lead into the environment, potentially exceeding SafeWork Australia guidelines for airborne lead dust. All efforts to prevent lead from entering waste streams are considered best practice and align with the principles of sustainable waste management and regulatory compliance. This approach ensures worker safety, environmental protection, and adherence to legislative requirements.

Table 3: Summary of Identified Hazardous Materials: Lead

Item (Refer to Section 7: Register)	Sample ID	Material Identified	Location	Lead Content (% w/w)	Action Required*
1.0	8788/L1	Paint Containing Lead	Sunk Bar, North east Glass Door, Paint, White	*Lead Paint 0.074% (0.1%)*	Removal; follow AS 4361.2
18.0	8788/L4	Paint Containing Lead	Mezzanine, Dance Floor, Eastern Windows, Paint, Brown	*Lead Paint 0.099% (0.1%)*	Removal; follow AS 4361.2
26.0	8788/L8	Paint Containing Lead	Auditorium, Dance Floor, Eastern Window, Paint, Orange	*Lead Paint 0.080% (0.1%)*	Removal; follow AS 4361.2

Item (Refer to Section 7: Register)	Sample ID	Material Identified	Location	Lead Content (% w/w)	Action Required*
31.0	8788/L9	Paint Containing Lead	Kitchen, Vent Hood above burners, Paint, White	Lead Paint 0.17% (0.1%)	Removal; follow AS 4361.2
50.0	8788/L12	Paint Containing Lead	Balcony, Awning, Wooden Beams, North of exit to balcony from Bar, Paint, Dark Green.	Lead Paint 0.15% (0.1%)	Removal; follow AS 4361.2
51.0	8788/L13	Paint Containing Lead	Balcony, Eaves, West, Paint, White	Lead Paint 0.41% (0.1%)	Removal; follow AS 4361.2
52.0	8788/L14	Paint Containing Lead	Balcony, Eaves, Timber, above western exit from Main Foyer	Lead Paint 0.14% (0.1%)	Removal; follow AS 4361.2
58.0	8788/L15	Paint Containing Lead	Storage beneath Poker Machines, Toilet, Walls, Paint, Light Blue	Lead Paint 0.14% (0.1%)	Removal; follow AS 4361.2
59.0	8788/L16	Paint Containing Lead	Storage beneath Poker Machines,	Lead Paint 0.31% (0.1%)	Removal; follow AS 4361.2

Item (Refer to Section 7: Register)	Sample ID	Material Identified	Location	Lead Content (% w/w)	Action Required*
			West of Exterior Storage Cage, Metal Pole, Blue		
60.0	8788/L17	Paint Containing Lead	Storage beneath Poker Machines, Corridor, Paint, Creme	Lead Paint 0.54% (0.1%)	Removal; follow AS 4361.2
61.0	8788/L18	Paint Containing Lead	Storage beneath Poker Machines, Store 2 East, Paint, Light Green	Lead Paint 0.19% (0.1%)	Removal; follow AS 4361.2
63.0	8788/L19	Paint Containing Lead	Storage beneath Poker Machines, Store 2 East, Wine Room, Paint, Creme	Lead Paint 0.20% (0.1%)	Removal; follow AS 4361.2
65.0	8788/L20	Paint Containing Lead	Storage beneath Poker Machines, Stairs to Telephone Room and Poker Machines, Paint, Green	Lead Paint 0.34% (0.1%)	Removal; follow AS 4361.2

Item (Refer to Section 7: Register)	Sample ID	Material Identified	Location	Lead Content (% w/w)	Action Required*
66.0	8788/L21	Paint Containing Lead	Storage beneath Poker Machines, Stairs to Telephone Room and Poker Machines, Paint, Red	**Lead Paint 0.34% (0.1%)**	Removal; follow AS 4361.2
43.0	8788/L22	Paint Containing Lead	Main Entrance, Exterior, Paint, White	*Lead Paint 0.074% (0.1%)*	Removal; follow AS 4361.2
70.0	8788/L23	Paint Containing Lead	Kitchen, External, Southern Wall, Paint, White	*Lead Paint 0.074% (0.01%)*	Removal; follow AS 4361.2
64.0	8788/L26	Paint Containing Lead	Storage beneath Poker Machines, Store 2 East, Wine Room, Northern Window, Paint, White	**Lead Paint 4.2% (0.1%)**	Removal; follow AS 4361.2
78.0	8788/L27	Paint Containing Lead	Office beneath Poker Machines, Northern Room, Walls, Paint, White	*Lead Paint 0.081% (0.1%)*	Removal; follow AS 4361.2

Item (Refer to Section 7: Register)	Sample ID	Material Identified	Location	Lead Content (% w/w)	Action Required*
46.0	8788/L28	Paint Containing Lead	Secondary Entry Foyer, West of Telephone Room, Above Ceiling, Paint, White	*Lead Paint 0.098% (0.1%)*	Removal; follow AS 4361.2

***In accordance with Appendix E, Regulatory References**

1.4.3 Summary of Identified Hazardous Materials: Synthetic Mineral Fibre (SMF)

Synthetic Mineral Fibre (SMF) was identified in ceiling tiles in specific areas of the premises during the inspection. Laboratory analysis confirmed the presence of SMFs in ceiling tiles from the mezzanine dance floor. These tiles, likely installed during renovations or updates, reflect the transition to synthetic mineral fibre materials commonly used for their acoustic properties and ease of installation in the mid to late 20th century.

The ceiling tiles in the auditorium may also contain SMFs. In contrast, ceiling tiles in the TAB, main foyer, and poker machine areas appear newer and are potentially composed of mineral fibre and/or gypsum. All of these materials, while less hazardous than asbestos, can still cause irritation to the skin, eyes, and respiratory system if disturbed and inhaled.

The table below summarises the identified occurrences of SMF -containing tiles within the site. It includes information on the sample ID (where applicable), material identified, location, and required actions. All SMF-containing materials must be carefully managed and removed prior to demolition, following the guidelines in the **National Occupational Health and Safety Commission (NOHSC) Code of Practice for the Safe Use of Synthetic Mineral Fibres (2006 [1990])** to minimise health risks and ensure compliance with regulatory requirements.

Table 4: Summary of Identified Hazardous Materials: Synthetic Mineral Fibres (SMF)

Item (Refer to Section 7: Register)	Sample ID	Material Identified	Location	Fibres Detected	Action Required8
9.00	-	Water Heater	Room, East of the Cool Room, Water Heater	Likely to contain Synthetic	

Item (Refer to Section 7: Register)	Sample ID	Material Identified	Location	Fibres Detected	Action Required8
				Mineral Fibres	Remove prior to demolition in accordance with NOHSC: 2006(1990)
24.0	8788/A16	Ceiling Tile	Mezzanine, Dance Floor	Synthetic Mineral Fibres detected	
33.0	Visually Assessed	Ceiling Tile	Auditorium, Dance Floor and Kitchen Dining	Synthetic Mineral Fibres	
45.0	Visually Assessed	Ceiling Tile	TAB	Mineral Fibres	
45.0	Visually Assessed	Ceiling Tile	Main Foyer	Mineral Fibres	
56.0	Visually Assessed	Ceiling Tile	Poker Machine Room	Mineral Fibres	

***In accordance with Appendix E, Regulatory References**

1.4.4 Summary of Identified Hazardous Materials: PCBs

Table 5: Summary of Identified Hazardous Materials: PCBs

Polychlorinated Biphenyls (PCBs) are commonly found in older electrical equipment, including fluorescent light fittings and capacitors, particularly in buildings constructed before the 1980s. While the building dates to the 1950s, this does not necessarily indicate that the electrical fixtures are of the same vintage. Observations made during the inspection noted older-style fluorescent lights in several locations. Most of these did not display distinguishing capacitors or labels; however, one ballast identified as **SOLTRA A140P 240 50 Hz** was confirmed as **non-PCB containing**, as per the ANZECC 1997 Guidance List.

All fluorescent light fittings should be treated as potentially containing PCBs unless confirmed otherwise. Capacitors should be checked against the ANZECC 1997 list before demolition or refurbishment to verify their status. Identified or presumed PCB-containing materials must be removed and managed in accordance with NSW EPA hazardous waste guidelines and industry best practices. The table below provides a summary of PCB-related findings.

Item (Refer to Section 7: Register)	Item	Material Identified	Location	Observations	Action Required
14.1	Fluorescent Light	Fluorescent Light Ballast	Ground Floor, Sunk Bar: - Room west of Sauna Ground Floor, Sunk Bar: -Ladies Toilet Ground Floor, Sunk Bar: - Meter Room	Older style lights observed. Most lacked distinguishing capacitors or labels.	Treat all fluorescent lights as containing PCBs. Remove and dispose of in accordance with ANZECC 1997 guidelines prior to demolition or refurbishment. Capacitors to be checked against ANZECC 1997 list.
14.2	Fluorescent Lights	Fluorescent Light Ballast	Ground Floor, Sunk Bar: - Corridor and Gym	SOLTRA A140P 240 50 Hz Ballast observed (not PCB-containing per ANZECC 1997 Guidance list).	No specific action required for SOLTRA A140P ballasts. However, verify other ballast types during removal.

2. Introduction

The demolition of any structure involves potential risks associated with hazardous materials, including asbestos, lead, and other harmful substances. Identifying and managing these materials is essential to assist the Person Conducting a Business or Undertaking (PCBU) to achieve compliance with regulatory requirements, protect the safety of workers and nearby communities, and minimise environmental impact.

This report provides the findings of a detailed hazardous materials inspection conducted at **Narrabeen RSL, 116 Nareen Parade, Narrabeen North**. The assessment was performed in accordance with relevant Australian legislation, standards, and guidelines to assist with planning and implementing safe demolition activities.

The information and recommendations contained within this document are designed to support the client and their contractors in implementing effective controls for hazardous materials management during the demolition process.

2.1 Purpose

The purpose of this report is to:

- Identify and document hazardous materials present at Narrabeen RSL that could pose risks during demolition.
- Provide a comprehensive register of hazardous materials, including their type, location, condition, and associated risks.
- Offer actionable recommendations for the management, removal, or mitigation of hazardous materials to ensure compliance with regulatory requirements and industry best practices.
- Facilitate the planning and execution of safe and efficient demolition activities by providing critical information to all stakeholders.

This report is intended to guide the client, contractors, and other relevant parties in managing hazardous materials effectively while minimising health, safety, and environmental risks. All relevant parties are to rely upon their own enquiries and expertise to implement and build upon the information contained herein.

2.2 Scope

This inspection and report cover the following:

- **Survey Type:** A pre-demolition hazardous materials inspection, including intrusive sampling where required to access hidden materials.
- **Areas Inspected:** Accessible internal and external areas of **Narrabeen RSL, 116 Nareen Parade, Narrabeen North**.
- **Materials Assessed:** The assessment focuses on identifying asbestos-containing materials (ACM), lead-based paint, synthetic mineral fibres (SMFs) and polychlorinated biphenyls (PCBs), commonly associated with demolition activities.
- **Limitations:**
    - Areas inaccessible at the time of inspection (e.g., structurally unsafe sections, locked spaces, items of plant, areas at height) were excluded from this assessment.
    - Hidden or concealed hazardous materials not visible during the inspection may be present and should be addressed as demolition progresses.

- **Regulatory Framework:** The inspection was conducted with reference to applicable Australian legislation, standards, and guidelines, including the WHS Act and Regulations, Safe Work Australia Codes of Practice, and relevant local council requirements.

This report does not include detailed design recommendations or compliance audits beyond the identification and initial management recommendations for hazardous materials.

3. Legislative Context

The identification, management, and removal of hazardous materials during demolition activities are governed by a comprehensive framework of Australian legislation, standards, and guidelines. This framework ensures the protection of workers, the community, and the environment from risks associated with hazardous materials such as asbestos, lead, and other harmful substances.

The following legislative and regulatory documents provide the basis for the inspection and recommendations outlined in this report:

3.1 Primary Legislation

1. **Work Health and Safety Act 2011 (WHS Act)**

- Establishes the legal framework for ensuring workplace safety, including the management of hazardous materials.

2. **Work Health and Safety Regulation 2011 (WHS Regulation)**

- Includes specific provisions for identifying, managing, and removing asbestos and other hazardous materials.

3. **Protection of the Environment Operations Act 1997 (POEO Act)**

- Regulates activities that may impact the environment, including the disposal of hazardous waste.

4. **Environmental Planning and Assessment Act 1979 (EP&A Act)**

- Guides the approval process for demolition works, ensuring environmental and public safety considerations are addressed.

3.2 Applicable Codes of Practice

1. **How to Manage and Control Asbestos in the Workplace (Safe Work Australia, 2021)**

- Provides detailed guidance on managing asbestos risks, including requirements for inspections, registers, and risk assessments.

2. **How to Safely Remove Asbestos (Safe Work Australia, 2021)**

- Outlines procedures for the safe removal of asbestos, including licensing requirements and worker safety protocols.

3. **Managing Risks of Hazardous Chemicals in the Workplace (Safe Work Australia, 2021)**

- Addresses the management of hazardous chemicals, including lead and polychlorinated biphenyls (PCBs).

3.3 Standards and Guidelines

4. **AS 2601:2001 The Demolition of Structures**

- Sets out best practices for safe demolition activities, including the management of hazardous materials.

5. **AS 4964:2004 Method for the Qualitative Identification of Asbestos in Bulk Samples**

- Defines laboratory procedures for identifying asbestos in materials collected during inspections.

6. **AS 5370:2024 Sampling and qualitative identification of asbestos in bulk materials.**

- These standard outlines updated methodologies for sampling and identifying asbestos in bulk materials, aligning Australian practices with international standards.

- AS 5370:2024 adopts and modifies ISO 22262-1:2012, enhancing accuracy in asbestos identification through advanced techniques, including Polarised Light Microscopy (PLM), Transmission Electron Microscopy (TEM), and Scanning Electron Microscopy (SEM), while maintaining practical sampling protocols.

  Note on Dual Compliance Requirement: Although AS 5370:2024 has replaced AS 4964:2004, the latter is still referenced in various jurisdictions and the Model Work Health and Safety (WHS) Regulation 149. Until legislative updates are fully implemented, compliance with both standards may be necessary, creating a dual compliance framework for asbestos identification practices.

7. **National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPM, amended 2013)**

- Provides a framework for assessing and managing contamination risks during construction and demolition activities.

8. **Construction Noise and Vibration Guideline (CNVG) (RMS, 2016)**

- Offers guidance on mitigating noise and vibration risks associated with hazardous material handling during demolition.

3.4 Local Requirements

In addition to the national framework, demolition activities must comply with any local council requirements, such as specific permits or waste management protocols. For this site, compliance with guidelines issued by **Northern Beaches Council** is required.

4 Methodology

The hazardous materials inspection at **Narrabeen RSL, 116 Nareen Parade, Narrabeen North**, was conducted using a systematic and industry-standard approach to ensure the identification and assessment of hazardous materials in compliance with applicable regulations and best practices.

4.1 Inspection Approach

The inspection conducted for this pre-demolition report was an intrusive hazardous materials survey. This type of inspection is necessary for pre-demolition activities, as it involves accessing all reasonably practicable areas of the structure to identify concealed hazardous materials. The approach adhered to the following:

Inspection Type

- **Intrusive Survey:**
    - This survey required physical penetration of building materials to inspect concealed spaces such as wall cavities, ceiling voids, and subfloor areas.
    - The intrusive nature of the survey ensures comprehensive identification of hazardous materials, minimising risks during demolition.

- Where access was restricted or unsafe, alternative inspection methods or assumptions were documented, as noted in the limitations section of this report.

Methods Used

1. **Visual Inspection:**

- Conducted throughout all accessible areas to identify visible signs of hazardous materials, such as damaged asbestos-containing materials (ACM), flaking lead-based paint, or suspect insulation.
- Visual clues such as labels, manufacturing stamps, or construction characteristics were also used to identify materials of concern.
- Assistance was provided on the second (2^{nd}) day of inspection to gain access to ceiling space above Poker Machine Room, Main Foyer, TAB and Auditorium, Office beneath Poker Machine Room, and Whipper Snipper Garage.

2. **Sampling and Testing:**

- Representative samples of suspected hazardous materials were collected and analysed by a **NATA-accredited laboratory** to confirm the presence and type of hazardous materials.
- Samples were selected based on:
    - **Material type** (e.g., insulation, ceiling tiles, pipe lagging).
    - **Condition** (e.g., intact, deteriorated, friable).
    - **Location** (e.g., high-risk areas like boiler rooms or external cladding).
- Laboratory analysis followed the **AS 4964:2004 Method for the Qualitative Identification of Asbestos in Bulk Samples** and similar standards for other hazardous materials.

3. **Document Review:**

- Historical site records, previous hazardous material reports, and building specifications were reviewed to inform the inspection.

4. **Use of Tools:**

- Standard tools such as borescopes and hand tools were employed to gain access to concealed spaces and collect samples safely.

Health and Safety Measures

- All work was conducted following Safe Work Australia's **Code of Practice: How to Safely Remove Asbestos** and other applicable guidance to ensure the safety of personnel and occupants.
- Appropriate personal protective equipment (PPE) was used during intrusive sampling, and contaminated equipment was decontaminated in accordance with regulatory requirements.

Compliance with Guidance

- The inspection methodology aligns with the **Draft National Guide for Asbestos Surveys (2024)**, ensuring comprehensive coverage of potential asbestos risks.

- Additional hazardous materials were inspected based on guidance from **HSG 227** and **HSG 264**.

4.2 Sampling and Analysis

Number and Type of Samples Collected

- **44 Asbestos** and **26 Lead Samples** were collected systematically to ensure representation of all suspect materials identified during the visual inspection.
- Types of materials sampled included:
  - Asbestos-containing materials (ACM).
  - Lead-based paint.
  - Synthetic mineral fibres (SMFs).

Laboratory Analysis

- All samples were sent to a NATA-accredited laboratory for testing, ensuring compliance with the following standards:

  - AS 4964:2004 for asbestos analysis.
  - X-ray fluorescence (XRF) and chemical digestion for lead.

Detailed Sampling Methodology

- A detailed explanation of the sampling methodology, including specific procedures, tools, and handling protocols, is provided in **Appendix C** for further reference.

4.3 Limitations

Areas Not Inspected

The scope of this inspection focused on accessible and intrusive visual assessments conducted over two days. While good access was achieved throughout most interior and exterior areas, certain locations were not inspected due to practical and logistical constraints inherent to this pre-demolition survey.

As consultants, we are experienced in conducting intrusive hazardous material inspections; however, we are not demolition experts. While every effort was made to identify and access potential locations for invasive sampling, including support from a demolition labourer on the second day, some opportunities to break open or further investigate areas may have been inadvertently missed. This limitation reflects the balance between thorough inspection and the practical constraints of the resources and methods available during the survey.

Specifically, areas requiring significant structural disturbance, specialised equipment, or detailed demolition expertise were excluded from inspection. These areas are documented in Table 6 below and may require further assessment during demolition to ensure the comprehensive identification and safe management of hazardous materials. It is recommended that such areas be treated as potentially hazardous until confirmed otherwise.

Table 6: Areas Not Inspected

Area	Reason for Inaccessibility	Potential Implications
Subfloor areas	Not inspected as this would require structural disturbance or access through hatches	Possible presence of asbestos-containing materials (ACMs) in fill, formwork debris, or pipe insulation.
Wall cavities	Intrusive methods were used, but no hatches were present, and walls were not demolished during this survey	Potential ACMs in insulation, electrical mounting boards, or fireproofing materials may exist and require further confirmation during demolition.
Ceiling spaces above fixed installations	Not accessed due to permanently fixed fixtures and the absence of visible pipework	ACMs in insulation, lagging, or fireproofing associated with items of plant may exist.
Fixed items themselves	Items such as plant, fixtures, or equipment were not disassembled for inspection Refer to Cupboard between Strong Room and TAB, and Cupboard external to Auditorium, Kitchen.	Potential presence of ACMs in gaskets, seals, or internal components.
Underground drainage	Pipes buried beneath the carpark and surrounding areas inaccessible without excavation	Possible asbestos cement pipes or conduits in underground infrastructure.
Below-ground fill materials	Excluded from scope based on the proposal	Not applicable for this inspection, though historically ACM debris has been used as fill material.
External wall cavities	Inaccessible without removal of cladding or external fixtures	Potential ACMs in insulation, formwork, or as backing material.
External areas at height	Inaccessible without elevated work platforms or scaffolding	Potential ACMs in eaves, soffits, or external lead-based paint occurrences.

Constraints

- **Sampling and Analysis** were limited to visible and accessible materials. Hidden or latent hazardous materials not apparent during the inspection may exist.
- **Findings and Recommendations** are based on the conditions observed at the time of inspection and are subject to changes in site conditions or regulations.

Also refer to Section 7, Register and Appendix B, Photographs.

5 Observations and Findings

5.1 General Observations

The site inspection at **Narrabeen RSL** was predominantly invasive to facilitate a thorough identification of hazardous materials, consistent with the requirements of a pre-demolition survey. However, certain areas were not accessed or destructively tested due to specific limitations. Examples include subfloor spaces, wall cavities, and items of plant (e.g., air conditioning units), where no visible access points such as hatches or risers were identified (or hatches to plant were not accessible), and there was no evidence (e.g., pipes in ceiling cavities) indicating the need for wall destruction.

The findings documented in this section reflect visual observations and sampling undertaken during the inspection. Areas not accessed are noted in Section 4 and 7 and should be treated as potentially hazardous until further assessment during demolition.

5.2 Summary of Findings by Area

5.2.1 Asbestos-Containing Materials (ACMs)

- Non-friable ACMs, including bonded cement sheeting, vinyl floor tiles, and adhesives, were identified in several areas.
- Sampling confirmed the presence of chrysotile and amosite asbestos in specific materials listed in Section 7. No friable asbestos was detected.
- Areas presumed to contain ACMs, such as inaccessible wall cavities, subfloor voids, unidentified plant and areas at height, should be managed under the **Unexpected Finds Protocol** during demolition.

5.2.2 Lead-Based Paint

- Lead concentrations exceeding 0.1% w/w were detected in paint samples collected from internal and external surfaces, including walls, and windows.
- Certain areas, such as external eaves and other high-access points, were not inspected due to access limitations and are presumed to contain lead-based paint.

5.2.3 Polychlorinated Biphenyls (PCBs)

- Observations included older-style fluorescent lights throughout the site. Most lacked distinguishing labels or capacitors for identification.
- A specific ballast type (SOLTRA A140P 240 50 Hz) was confirmed to be non-PCB containing, per **ANZECC 1997 Guidance**. All other fluorescent lights and ballasts should be treated as PCB-containing unless verified otherwise during removal.

5.2.4 Synthetic Mineral Fibres (SMFs)

- Synthetic Mineral Fibre (SMF) was identified in ceiling tiles in the mezzanine dance floor, confirmed through laboratory analysis. These tiles, likely installed during renovations or updates, reflect the

transition to SMF materials commonly used for their acoustic properties and ease of installation in the mid to late 20th century.

- Ceiling tiles in the auditorium are presumed to contain SMFs. Sampling and analysis during removal are recommended to confirm their composition.
- Ceiling tiles in the TAB, main foyer, and poker machine areas appear newer and are potentially composed of mineral fibre and/or gypsum, materials commonly used in later renovations. While these materials are less hazardous than asbestos or SMFs, they should still be handled carefully to prevent irritation or dust inhalation.
- All SMF-containing materials must be carefully managed and removed prior to demolition, following the **National Occupational Health and Safety Commission (NOHSC) Code of Practice for the Safe Use of Synthetic Mineral Fibres (2006 [1990])**, to minimise health risks.

5.3 Specific Observations by Area

5.3.1 Mezzanine Dance Floor:

- **Synthetic Mineral Fibres (SMFs):** Laboratory analysis confirmed the presence of SMFs in the ceiling tiles. These tiles must be carefully removed during demolition to prevent fibre release.
- **Lead-Based Paint:** Detected on painted surfaces, requiring management prior to demolition.

5.3.2 Auditorium:

- **Presumed SMFs:** Ceiling tiles are presumed to contain SMFs. Sampling and analysis are recommended during removal to confirm composition.
- **Lead-Based Paint:** Present on interior surfaces, requiring controlled removal.

5.3.3 TAB, Main Foyer, and Poker Machine Areas:

- **Ceiling Tiles (Mineral Fibre or Gypsum):** Newer tiles observed, potentially composed of mineral fibre and/or gypsum. These materials should still be managed carefully during demolition.
- **Synthetic Insulation above Ceiling Tiles:** Composed of fibreglass, rock wool and should still be managed carefully during demolition. Likely to have surface asbestos contamination.
- **Lead-Based Paint:** Presumed on some painted surfaces, particularly high-access points and fixtures.
- **Asbestos-Contaminated Dusts and Debris (ACD):** As with other areas beneath the super-six roofing, there is potential for ACD in ceiling voids.

5.3.4 Main Building Interior:

- **Asbestos-Containing Materials (ACMs):** Vinyl tiles, adhesives, and bonded cement sheeting identified in multiple rooms.
- **Polychlorinated Biphenyls (PCBs):** Older-style fluorescent lights observed. Most lacked distinguishing labels or capacitors, requiring presumptive treatment as PCB-containing.
- **Asbestos-Contaminated Dusts and Debris (ACD):** Areas beneath the super-six roofing, including ceiling voids, may contain ACD and should be managed accordingly.

5.3.5 External Areas:

- **Lead-Based Paint:** Presumed present on external walls and eaves, particularly in areas not inspected due to access limitations.
- **Asbestos-Containing Materials (ACMs):** Presumed to be present in eaves and other areas at height, and subfloor fill material.

5.3.6 Ceiling and Void Spaces:

- **Synthetic Mineral Fibres (SMFs):** Present in some ceiling tiles (e.g., mezzanine and auditorium) and Insulation Batts (e.g. above Main Foyer)
- **Lead Dust:** Presumed in deteriorating painted areas and voids, requiring surface cleaning pre-demolition.
- **Asbestos-Contaminated Dusts and Debris (ACD):** Ceiling voids beneath the super-six roofing are likely to contain ACD and should be treated as hazardous.

5.4 Observations on Accessibility

While the inspection was invasive, certain areas remained inaccessible or were not destructively tested due to structural and practical constraints:

- **Subfloor Areas:** No visible access hatches or entry points, and no structural indications warranted destructive investigation.
- **Wall Cavities:** Lack of risers or access points, combined with no visible indicators of pipes or hazardous materials, meant walls were not destructively tested.
- **Ceiling Spaces Above Fixed Installations:** Areas above fixed plant (e.g., air conditioning units) lacked access and evidence of pipes or other materials justifying access or destruction.
- **External Areas at Height:** Eaves and other high-access points could not be inspected due to the absence of scaffolding or elevated work platforms.
- **Fixed Installations:** Items such as air conditioning units and other mechanical fixtures were not disassembled during the survey.

These limitations are noted in Section 4 and 7, and such areas should be treated as potentially hazardous until further inspection or demolition progresses.

5.5 Risk Assessment

The following risk assessment outlines key considerations for managing hazardous materials identified during the inspection, with a focus on ensuring safe removal and compliance with regulatory requirements prior to demolition.

5.5.1 Material Condition

- The condition of hazardous materials, including asbestos-containing materials (ACMs), lead-based paint, and other identified hazards, has not been included in the hazardous materials register. This is because all identified materials are to be removed by licensed removalists prior to demolition.
- The removal of hazardous materials will be conducted in accordance with applicable documents including the **Asbestos Removal Control Plan (ARCP)**. These documents ensure appropriate procedures are followed for safe removal and disposal.

5.5.2 Potential for Disturbance

- Licensed removalists are responsible for ensuring that hazardous materials are safely handled, contained, and removed, minimising the risk of disturbance. Removalists must adhere to the procedures outlined in the ARCP.
- During demolition, any unexpected hazardous materials encountered must be managed following the **Unexpected Finds Protocol (UFP)** included in Appendix F of this report. This protocol provides step-by-step guidance to address materials that were not identified during the initial inspection.

5.5.3 Proximity to Sensitive Receptors

- **On-Site Workers:** Other workers or personnel must not be in proximity to hazardous material removal works to prevent exposure. Exclusion zones should be established and clearly marked to restrict access during removal activities.
- **Neighbours and Adjacent Properties:** Neighbours and individuals in surrounding areas should not be in proximity to demolition works. Demolition contractors must ensure dust suppression and other controls are in place to prevent the spread of hazardous materials off-site.

5.6 Hazardous Materials Identified

The inspection identified several types of hazardous materials within the site. These materials must be carefully managed and removed by licensed removalists prior to demolition, in accordance with regulatory requirements and industry best practices. A summary of the hazardous materials identified is provided below:

5.6.1 Asbestos-Containing Materials (ACMs)

- Non-friable ACMs, including bonded cement sheeting, vinyl floor tiles, and adhesives, were identified in various locations.
- All ACMs are to be removed by licensed asbestos removalists following an **Asbestos Removal Control Plan (ARCP)**. Clearance inspections by an independent Comptent Person or Licensed Asbestos Assessor (LAA) are required post-removal.

5.6.2 Lead-Based Paint

- Lead-based paint was detected in multiple areas, with concentrations exceeding **0.1% w/w** in sampled materials. This includes painted surfaces in both internal and external areas.
- Removal of lead-based paint should follow safe practices, such as wet sanding or chemical stripping, to minimise dust generation. Post-removal clearance testing is recommended to confirm no residual contamination.

5.6.3 Polychlorinated Biphenyls (PCBs)

- Older-style fluorescent lights and associated ballasts were observed in various locations. Most lacked distinguishing labels or capacitors and should be treated as PCB-containing unless verified otherwise.
- PCB-containing materials must be removed and disposed of in accordance with NSW EPA hazardous waste guidelines. Capacitors should be cross-checked with the **ANZECC 1997 Guidance List**.

5.6.4 Synthetic Mineral Fibres (SMFs)

- SMFs were confirmed in ceiling tiles in the mezzanine dance floor and are presumed in similar tiles in the auditorium. Ceiling tiles in the TAB, main foyer, and poker machine areas appear newer and are likely composed of mineral fibre or gypsum.

- SMF-containing materials must be handled carefully to prevent fibre release and disposed of in compliance with the **National Occupational Health and Safety Commission (NOHSC) Code of Practice for the Safe Use of Synthetic Mineral Fibres (2006 [1990])**.

5.6.5 Unexpected Finds Protocol (UFP) [Chemicals]

While this report does not cover hazardous chemicals within its scope, an Unexpected Finds Protocol (UFP) for chemicals is recommended. This protocol should be followed if any chemical residues, spills, or other hazardous substances are encountered during demolition. It should include:

- Immediate cessation of work in the affected area.
- Notification of relevant personnel and authorities.
- Engagement of qualified professionals to assess, contain, and manage the hazard.

6 Recommendations

6.1 Immediate Actions:

The following actions are recommended to ensure the safe and compliant removal of hazardous materials before demolition commences:

1. Asbestos Removal:
   - All identified asbestos-containing materials (ACMs) must be removed by a licensed asbestos removalist in accordance with **SafeWork NSW Code of Practice: How to Safely Remove Asbestos (2022)**.
   - While air monitoring is not mandatory for non-friable asbestos removal, it is strongly recommended to ensure fibre levels remain below the SafeWork Australia exposure standard, particularly given the likelihood of dust and debris in adjacent locations.
2. Lead-Based Paint:
   - Areas containing lead-based paint should be managed by trained personnel in accordance with **AS 4361.2-2017**.
   - Use appropriate methods such as wet sanding or chemical stripping to minimise lead dust during removal.
3. Polychlorinated Biphenyls (PCBs)
   - Identify and remove PCB-containing equipment, including fluorescent lights and capacitors, prior to demolition.
   - Disposal must comply with NSW EPA hazardous waste guidelines.
4. Synthetic Mineral Fibres (SMFs):
   - Remove SMF-containing materials, such as ceiling tiles, with appropriate dust suppression measures to reduce airborne fibre release.
   - Workers should wear disposable coveralls and respiratory protection (P2 or P3 masks) during handling.

6.2 Demolition Precautions:

To ensure worker and environmental safety during demolition:

1. Airborne Dust and Fibre Control:
    - Implement dust suppression measures, such as wetting down materials during demolition.
    - Establish exclusion zones to prevent unauthorised personnel from entering high-risk areas.
    - Conduct air monitoring if demolition activities have the potential to disturb residual dust or debris containing asbestos fibres.
2. Waste Management:
    - Segregate hazardous waste from general construction waste during demolition.
    - Dispose of hazardous materials at a licensed EPA-approved facility.
3. Unexpected Finds Protocol (Refer to Appendix G below):
    - Cease work immediately if any previously unidentified hazardous materials (e.g., hidden ACMs or PCB-containing equipment) are discovered.
    - Engage a Licensed Asbestos Assessor (LAA) or competent person to assess and manage unexpected materials in accordance with the Unexpected Finds Protocol.

6.3 Post-Demolition Clearance:

The following steps must be completed to ensure the site is free from hazardous materials after demolition:

1. Clearance Inspections
    - Engage a competent person to verify that all hazardous materials (Competent Person for Non-Friable Asbestos or Licensed Asbestos Assessor for Friable asbestos or Non-Friable Asbestos) have been safely removed and the area is free from contamination.
    - Provide clearance documentation to confirm compliance with regulatory requirements.
2. Final Waste Documentation:
    - Maintain records of all hazardous waste disposal, including receipts and waste transport certificates, in compliance with NSW EPA requirements.

7 Hazardous Materials Register

7.1 Introduction

This Hazardous Materials Register has been prepared as part of the pre-demolition inspection for the **Narrabeen RSL**. Its primary purpose is to identify the location and type of hazardous materials present on-site, facilitating their safe removal prior to demolition in accordance with **AS 2601-2001 (The Demolition of Structures)** and relevant codes of practice.

As this is a **pre-demolition inspection**, no condition or risk rating has been assigned to the materials listed in the register. Furthermore, this register does not include measurements or estimates of the extent of hazardous materials. Contractors engaged to price or conduct the works are strongly advised to **undertake their own inspections and measurements** to ensure accurate pricing and planning. Any measurements or quantities provided by consultants (if included) should not be relied upon for contractual purposes, as they are not intended for that use.

The findings in this register are based on **visual inspections and sampling** carried out in accessible areas. Any materials discovered during demolition that are not listed here should be treated as potentially hazardous until further assessment is conducted in accordance with the **Unexpected Finds Protocol** (refer to Appendix G).

This register is intended to assist demolition contractors in complying with regulatory requirements and ensuring the safety of workers, the public, and the environment during the demolition process.

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Table 7: Hazardous Materials Register: Ground Floor Sunk Bar and Adjoining Areas.

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required*	Notes
1.0	Paint	8788/L1	Sunk Bar, North east Glass Door, Paint, White	1	*Lead Paint 0.074% (0.1%)*	Removal; follow AS 4361.2	-
2.0	Paint	8788/L2	Sunk Bar, South east Corner, Paint, Black	1	<0.01 % w/w	No further action required.	-
3.0	Vermiculite	8788/A1	Sunk Bar, Ceiling, Vermiculite	-	Negative for Asbestos	-	-
4.0	Vermiculite	8788/A2	Room, South of Sunk Bar and West of Male Toilet	-	Negative for Asbestos	-	-
5.0	Fabric	8788/A3	Male Toilet, Window	-	Negative for Asbestos	-	-
6.0	Floor Tile & Adhesive (Black Jack)	8788/A4	Room, Adjacent West of Male Toilet, Vinyl Tile, White/Beige	3	Chrysotile, Tile and Adhesive	Remove and Dispose	Non-Friable
7.0	Paint	8788/L3	Room, West of Above Room (South of Sunk Bar and West of Male Toilet), Paint, Green	-	<0.01 % w/w	No further action required.	-

***In accordance with Appendix E, Regulatory References.**

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Table 7: Hazardous Materials Register: Ground Floor Sunk Bar and Adjoining Areas. Continued.

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required*	Notes
8.0A	Floor Tile	-	Room (external to Sauna), Vinyl Flooring, as per above (8788/A4) White/Beige	4	Chrysotile	Remove and Dispose	Non-Friable
8.0B	Vinyl Floor Edging	8788/A5	Room (external to Sauna), Edging and Glue, Base of Walls (All) Black	-	Negative for Asbestos	-	-
9.0	Cement Sheeting	8788/A6	Room, East of the Cool Room, Water Heater, Base **Note: Water Heater is likely to contain SMF**	5 and 6	Chrysotile	Remove and Dispose	Non-Friable
10.0	Electrical Backing Board	8788/A7	Room, East of the Cool Room, Electrical Backing Board.	5 and 7	Chrysotile	Remove and Dispose	Non-Friable
11.0	Vermiculite	8788/A8	Ladies WC, Ceiling, Vermiculite	-	Negative for Asbestos	-	-
12.0A	Vinyl Flooring	-	Gym, Vinyl Flooring, as per above (8788/A4). White/Beige	-	Chrysotile	Remove and Dispose	Non-Friable

***In accordance with Appendix E, Regulatory References.**

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Table 7: Hazardous Materials Register: Ground Floor Sunk Bar and Adjoining Areas. Continued.

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required*	Notes
12.0B	Edging	-	Gym, Edging and Glue, Base of Walls (8788/A5), Black	-	Negative	-	-
13.0A	Floor Tile	-	Small Space, between Gym and Stairwell, Tile/s, White (8788/A4)	8	Chrysotile	Remove and Dispose	Non-Friable
13.0B	Floor Tile and Adhesive (Black Jack)	8788/A9	Small Space, between Gym and Stairwell, Tile/s, Red (8788/A9)	8	Chrysotile	Remove and Dispose	Non-Friable
14.0	Electrical Backing Boards	-	Air Conditioning Room, Black Electrical Backing Boards (x 6 (3 x loose on floor)	9 and 10	Assume Chrysotile (Refer to 8788/A7)	Remove and Dispose	Non-Friable
14.1	Fluorescent Light, Ballast	-	Ground Floor, Sunk Bar: Room west of Sauna, Ladies Toilet, Meter Room	-	Presumed to contain PCB's	Remove and Dispose	-
14.2	Fluorescent Light, Ballast	-	Ground Floor, Sunk Bar: Corridor and Gym	-	SOLTRA A140P 240 50 Hz Ballast observed (not PCB-containing per ANZECC 1997 Guidance list).		-
14.3	Fire Doors	-	Sunk Bar GYM/Stairwell Area	11 and 12	Fire Doors Installed 2016		-

***In accordance with Appendix E, Regulatory References.**

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Table 8: Hazardous Materials Register: Mezzanine Areas.

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required*	Notes
15.0	Paper Material	8788/A10	Male Toilet, Stairwell, Ceiling Cavity, Paper Material, Black	-	Negative for Asbestos	-	-
16.0	Vermiculite	8788/A11	Stairwell, Ground Floor to 2nd Floor	-	Negative for Asbestos	-	-
17.0	Putty	8788/A12	Dance Floor, Eastern Windows, Putty	-	Negative for Asbestos	-	-
18.0	Paint	8788/L4	Dance Floor, Eastern Windows, Paint, Brown	14	*Lead Paint 0.099% (0.1%)*	Removal; follow AS 4361.2	
19.0	Vinyl Skirting material	8788/A13	Lower Wall of Mezzanine and Bar, Skirting, Black	-	Negative for Asbestos	-	-
20.0	Mastic	8788/A14	Mezzanine exterior to Bar, Floor, Mastic between Black Tiles	-	Negative for Asbestos	-	-
21.0	Floor Tile	8788/A15	Kitchen, Black Vinyl Tile	-	Negative for Asbestos	-	-

***In accordance with Appendix E, Regulatory References.**

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Table 8: Hazardous Materials Register: Mezzanine Areas. Continued

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
22.0	Paint	8788/L5	Store to rear of Mezzanine, Paint to Pipe, White	-	<0.1 % w/w	No further action required.	-
23.0	Paint	8788/L6	Store to rear of Mezzanine, Paint to Wall, White	-	<0.1 % w/w	No further action required.	-
24.0	Ceiling Tile	8788/A16	Mezzanine, Dance Floor, Ceiling Tile	13	Negative for Asbestos Content. Synthetic Mineral Fibres detected.	Remove prior to demolition works in accordance with the Code of practice for the safe use of synthetic mineral fibres [NOHSC: 2006(1990)]-	-

***In accordance with Appendix E, Regulatory References.**

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Table 9: Hazardous Materials Register: Auditorium, Restaurant and Kitchen.

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
25.0	Paint	8788/L7	Auditorium, Eastern Window, Paint, Crème	-	<0.1 % w/w	No further action required.	-
26.0	Paint	8788/L8	Auditorium, Eastern Window, Paint, Orange	17 and 18	*Lead Paint 0.08% (0.1%)*	Removal; follow AS 4361.2	-
27.0	Putty	8788/A17	Auditorium, Eastern Window, Putty, Crème	-	Negative for Asbestos	-	-
28.0	Cement Sheeting	8788/A44	Auditorium, Southern end above Kitchen Seating, above ceiling tiles, W-E Beam, Cement sheeting affixed to side of Beam. Beige	22	Chrysotile	Remove and Dispose	Non-Friable
29.0	Floor Tile	8788/A18	Kitchen, Floor Tile, White	-	Negative for Asbestos	-	-
30.0	Flooring	8788/A19	Kitchen, Fridge/Cool Room Flooring	-	Negative for Asbestos	-	-

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
31.0	Paint	8788/L9	Kitchen, Vent Hood above burners, Paint, White	-	Lead Paint 0.17% (0.1%)	Removal; follow AS 4361.2	-

*In accordance with Appendix E, Regulatory References.

Table 9: Hazardous Materials Register: Auditorium, Restaurant and Kitchen. Continued.

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
32.0	Paint	8788/L10	Kitchen, South Wall, Paint, Blue	-	<0.1 % w/w	No further action required.	-
33.0	Ceiling Tile	Visual Assessment	Auditorium, Dance Floor.	15 and 16	Synthetic Mineral Fibres	Remove prior to demolition in accordance with NOHSC: 2006(1990)	

*In accordance with Appendix E, Regulatory References.

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Table 10: Hazardous Materials Register: TAB, Main Foyer, "No Entry" Room, Main Entrance, Main Entrance Exterior, Office/Strong Room, Toilets

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
34.0	Ceiling Tile	8788/A20	"No Entry" Room (East and Opposite to TAB) Ceiling Tile, Crème coloured	-	Negative for Asbestos	Remove prior to demolition works in accordance with the Code of practice for the safe use of synthetic mineral fibres [NOHSC: 2006(1990)]	-
35.0	Floor Tile	8788/A21	"No Entry" Room, Vinyl Floor Tile, Grey	-	Negative for Asbestos	-	-
36.0	Vinyl Tile	8788/A22	Bar, Vinyl Tile underneath Beer Taps, Black	-	Negative for Asbestos	-	-
37.0A	Wall Tile	8788/A23	Bar, Wall Tile, South of Beer Taps, Beige	28	Chrysotile	Remove and Dispose	Non-Friable
37.0B	Adhesive	8788/A23	Bar, Wall Tile, South of Beer Taps, Adhesive	-	Negative for Asbestos	-	-
38.0	Ceiling Lining	8788/A31	Office to Strong Room, Ceiling Lining, Beige	25	Chrysotile, Amosite	Remove and Dispose	Non-Friable

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Table 10: Hazardous Materials Register: TAB, Main Foyer, "No Entry" Room, Main Entrance, Main Entrance Exterior, Office/Strong Room, Toilets Continued

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
39.0	Cornice	8788/A32	Office to Strong Room, Ceiling, Cornice, Grey	25	Chrysotile, Amosite	Remove and Dispose	Non-Friable
40.0	Vinyl Mat	8788/A33	Office to Strong Room, Desk, Mat, Patterned Vinyl	-	Negative	-	-
41.0	Fluorescent Light, Ballast	N/A	Office to Strong Room, Ceiling Light	-	Presumed to contain PCB's	Remove and Dispose	Refer to Section 1.4.4
42.0	Cement Sheeting	8788/A34	Main Entrance, Exterior, Eaves, White	27	Chrysotile	Remove and Dispose	Non-Friable
43.0	Paint	8788/L22	Main Entrance, Exterior, Paint, White	27	*Lead Paint 0.074% (0.1%)*	Removal; follow AS 4361.2	-
44.0	Cement Sheeting	8788/A43	Main Entrance, Exterior, Eastern side of entry, Infill Panel	26	Chrysotile	Remove and Dispose	Non-Friable
45.0	Ceiling Tile	Visual Assessment	TAB + Main Foyer, Ceiling	-	Mineral Fibres	Remove prior to demolition with NOHSC: 2006(1990)	-

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Table 11: Hazardous Materials Register: Secondary Entry Foyer, Telephone Room, Poker Machines and Balcony

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
46.0	Paint	8788/L28	Secondary Entry Foyer, West of Telephone Room, Above Ceiling, Paint, White	-	*Lead Paint 0.098% (0.1%)*	Removal; follow AS 4361.2	-
47.0A	Vinyl Tiles	8788/A24	Small Room, East of Telephone Room, Vinyl Floor Tiles, Grey	-	Chrysotile	Remove and Dispose	Non-Friable
47.0B	Adhesive	8788/A24	Small Room, East of Telephone Room, Vinyl Floor Tiles, Adhesive	-	Negative for Asbestos	-	-
48.0	Putty	8788/A25	Poker Machines (Room), wooden beam in ceiling cavity, Putty, White.	-	Negative for Asbestos	-	-
49.0	Paint	8788/L11	Balcony, Brickwork adjacent east to exit to balcony from Bar, Paint, Light Green.	-	<0.1 % w/w	No further action required.	-

*In accordance with Appendix E, Regulatory References.

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Table 11: Hazardous Materials Register: Secondary Entry Foyer, Telephone Room, Poker Machines and Balcony Continued

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
50.0	Paint	8788/L12	Balcony, Awning, Wooden Beams, North of exit to balcony from Bar, Paint, Dark Green.	29	Lead Paint 0.15% (0.1%)	Removal; follow AS 4361.2	-
51.0	Paint	8788/L13	Balcony, Eaves, West, Paint, White	30	Lead Paint 0.41% (0.1%)	Removal; follow AS 4361.2	-
52.0	Paint	8788/L14	Balcony, Eaves, Timber, above western exit from Main Foyer, Green	30	Lead Paint 0.14% (0.1%)	Removal; follow AS 4361.2	-
53.0	Cement Sheeting	8788/A26	Balcony, Eave Lining (Mould impacted), Western end of Balcony (closest to Restaurant/Auditorium)	-	Negative for Asbestos	-	-

*In accordance with Appendix E, Regulatory References.

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Table 11: Hazardous Materials Register: Secondary Entry Foyer, Telephone Room, Poker Machines and Balcony Continued

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
54.0	Cement Sheeting	8788/A27	Balcony, Wall Cladding, West Side	-	Negative for Asbestos	-	-
55.0	Cement Sheeting	8788/A28	Balcony, Wall Cladding, (Locked) Storeroom, Southern side of Balcony (exterior to "No Entry" Room), Painted, Green/Grey	-	Chrysotile	Remove and Dispose	Non-Friable
56.0	Ceiling Tile	Visual Assessment	Poker Machine Room, Ceiling	-	Mineral Fibres	Remove prior to demolition in accordance with NOHSC: 2006(1990)	
57.0	Cement Sheeting	8788/A29	Roof, "Super Six" cement material. **	31 and 32	Chrysotile	Remove and Dispose	Non-Friable

***In accordance with Appendix E, Regulatory References.** **Special Note: All dust, and debris in ceiling cavity below roofing, should be considered as asbestos contaminated [apply appropriate precautions].

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Table 12: Hazardous Materials Register: Storage beneath Poker Machine Room [Accessed via Stairs behind Telephone Room]

For the purposes of this survey, the side of the building facing the bowling greens is North. For the purposes of this section, the locations found within this area are described as; Store 1 to the West, Store 2 to the East, Toilet to the East, External Storage Cage to the North East.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
58.0	Paint	8788/L15	Toilet, Walls, Paint, Light Blue	33	Lead Paint 0.14% (0.1%)	Removal; follow AS 4361.2	
59.0	Floor Tile	8788/A30	Floor, Tiles, Crème	-	Negative	-	-
60.0	Paint	8788/L16	West of Exterior Storage Cage, Metal Pole, Blue	34	Lead Paint 0.31% (0.1%)	Removal; follow AS 4361.2	
61.0	Paint	8788/L17	Corridor, Paint, Creme	35	Lead Paint 0.54% (0.1%)	Removal; follow AS 4361.2	
62.0	Paint	8788/L18	Store 2 East, Paint, Light Green	36	Lead Paint 0.19% (0.1%)	Removal; follow AS 4361.2	
63.0	Paint	8788/L19	Store 2 East, Wine Room, Paint, Creme	37	Lead Paint 0.20% (0.1%)	Removal; follow AS 4361.2	
64.0	Paint	8788/L26	Store 2 East, Wine Room, Northern Window, Paint, White	-	Lead Paint 4.20% (0.1%)	Removal; follow AS 4361.2	
65.0	Paint	8788/L20	Stairs to Telephone Room and Poker Machines, Paint, Green	38	Lead Paint 0.34% (0.1%)	Removal; follow AS 4361.2	
66.0	Paint	8788/L21	Stairs to Telephone Room and Poker Machines, Paint, Red	38	Lead Paint 0.26% (0.1%)	Removal; follow AS 4361.2	

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Table 12: Hazardous Materials Register: Storage beneath Poker Machine Room [Accessed via Stairs behind Telephone Room] Continued

For the purposes of this survey, the side of the building facing the bowling greens is North. For the purposes of this section, the locations found within this area are described as; Store 1 to the West, Store 2 to the East, Toilet to the East, External Storage Cage to the North East.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
67	Fluorescent Light, Ballast	N/A	Toilet	-	Presumed to contain PCB's	Remove and Dispose	Refer to Section 1.4.4
68	Fluorescent Light, Ballast	N/A	Ecolab Room	-	Presumed to contain PCB's	Remove and Dispose	Refer to Section 1.4.4

***In accordance with Appendix E, Regulatory References.**

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Table 13: Hazardous Materials Register: North Eastern corner of building, beneath Poker Machine Room, Kitchen [access via external entry on North Eastern side)

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
69.0	Floor Tile	8788/A35	Kitchen, Floor, Tiles, Crème	-	Negative for Asbestos	-	-
70.0	Paint	8788/L23	Kitchen, Southern Wall, Paint, White	43	*Lead Paint 0.074% (0.01%)*	Removal; follow AS 4361.2	
71.0	Wall Lining	8788/A36	External to Kitchen, Northern Wall Lining	-	Negative for Asbestos	-	-
72.0	Paint	8788/L25	External to Kitchen, East, Hand Rail, Paint, White	-	<0.1 % w/w	No further action required.	-

***In accordance with Appendix E, Regulatory References.**

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Table 14: Hazardous Materials Register: Sub-Floor, beneath Balcony [access via external entry]

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
73.0	Cement Sheeting	8788/A37	Ground and beneath/between wooden joists of Balcony, Cement sheeting packers, Grey	-	Negative for Asbestos	-	-
74.0	Cement Sheeting	8788/A39	Ground North of Balcony, Cement Sheeting Debris, Grey	-	Chrysotile, Amosite	Remove and Dispose	Non-Friable
75.0	Cement Sheeting	8788/A38	Ground beneath Balcony, Cement Sheet	-	Negative for Asbestos	-	-
76.0	Bituminous Material	8788/A40	Beneath Balcony, External to Storage Cage [refer above, access via stairwell from Telephone Room], Base edge of concrete, Bituminous Material	-	Chrysotile	Remove and Dispose	Non-Friable

***In accordance with Appendix E, Regulatory References.**

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Table 15: Hazardous Materials Register: Office, beneath Poker Machines, above "Whipper Snipper" Garage [access via external entry on South Eastern side)

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
77.0	Paint	8788/L24	External to Office entry (Southern wall), Paint, Grey Green	-	<0.1 % w/w	No further action required.	-
78.0	Paint	8788/L27	Office, Northern Room, Walls, Paint, White	39	*Lead Paint 0.081% (0.1%)*	Removal; follow AS 4361.2	

***In accordance with Appendix E, Regulatory References.**

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Table 16: Hazardous Materials Register: "Whipper Snipper" Garage [access via external entry on North Eastern side)

For the purposes of this survey, the side of the building facing the bowling greens is North.

Item	Material Identified	Sample ID	Location	Photograph	Hazard Type	Action Required	Notes
79.0	Cement Materials	8788/A41	Southern Room, Garage, Western Wall, Sub-Floor (Access Hatch), Grey	40, 41 and 42	Chrysotile, Amosite	Remove and Dispose	
80.0	Electrical Backing Board	8788/A42	Southern Room, Garage, Western Wall, Electrical Backing Board	40	Assume Chrysotile (Refer to 8788/A7)	Remove and Dispose	

***In accordance with Appendix E, Regulatory References.**

7.2 Special Note: Synthetic Fibres.

Fibre Identification and Risk Assessment:

- **Difference Between Asbestos, Organic, and Synthetic Fibres:** Asbestos is a naturally occurring mineral fibre with unique durability and resistance to heat. Its health risks arise from its ability to fragment into tiny, airborne fibres that, when inhaled, embed in lung tissue, causing diseases like asbestosis and mesothelioma. In contrast, organic fibres (derived from natural materials like cellulose) and synthetic fibres (e.g., glass wool and rock wool) do not exhibit the same health risks as asbestos when handled properly. These fibres are non-crystalline and amorphous, meaning they do not split into smaller respirable fibres like asbestos. When managed in line with standard procedures, both organic and synthetic fibres are non-carcinogenic under typical exposure levels and are considered non-hazardous.
- **Risk Associated with Demolition:** Demolition work involving materials containing asbestos requires stringent controls due to its severe health risks. In contrast, organic fibres (e.g., cellulose) and synthetic fibres (e.g., glass wool, rock wool, slag wool) pose minimal health risks during demolition. Synthetic mineral fibres (SMF), although capable of causing mechanical irritation to the skin and mucous membranes, are classified as non-carcinogenic under conventional exposure levels if they meet low bio-persistence standards, such as the "Nota Q" criteria under EU regulations. Testing for compliance with Nota Q standards can provide clarity and peace of mind regarding the health risks associated with the SMFs in a building. If the materials are confirmed to be low bio-persistent, they pose minimal health risks, and standard demolition practices will be sufficient. If testing is not feasible, ensure that all demolition activities adhere to strict safety protocols to mitigate any potential risks.

  Ensure compliance with the WHS Regulation 2017, the National Code of Practice for the Safe Use of Synthetic Mineral Fibres, and AS 2601-2001 The Demolition of Structures and all relevant guidance documents. Standard dust suppression and personal protective equipment (PPE) are essential to manage risks effectively.
- **Action for Uncovered Materials:** If unidentified materials are discovered during demolition that are not listed in the asbestos register, work must cease immediately in that area. Testing and analysis should be conducted to determine the nature of the materials. This precaution ensures no unforeseen hazards compromise the safety of workers and the public.

Where organic and synthetic fibres were identified via analysis, these findings validate that while the sampled materials do not present asbestos-related risks, they should still be handled with care following routine demolition protocols.

Please refer to a list of guidance documents including those listed below in Appendix E.

8 Appendices

- Appendix A: Site Photograph
  - Aerial Photograph showing location of Building.
- Appendix B: Photographs
  - Clear, labelled photographs of identified hazardous materials.
- Appendix C: Laboratory Analysis Certificates
  - NATA-accredited analysis results for sampled materials.
- Appendix D1: Project Limitations and Assumptions
  - Detailed explanation of project specific constraints and assumptions in the report.
- Appendix D2: General Limitations and Assumptions
  - Detailed explanation of general constraints and assumptions in the report.
- Appendix E: Regulatory References
- Appendix F: Hazardous Materials
- Appendix G: Unexpected Finds Protocol
- Appendix H: Our Services

Appendix A: Site Photograph

Site Photograph

Site Location: Narrabeen RSL, 116 Nareen Parade, Narrabeen North

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Appendix B: Photographs

Photographs

Table 4A: Photographs. Ground Floor Sunk Bar Area.

Building/Location	
Photograph 1: Sunk Bar, *White (8788/L1)* and Black (8788/L2) Paint (<0.1%) 	**Photograph 2: Sunk Bar, Vermiculite (8788/A1), Negative for Asbestos Content** 
Photograph 3: Ground Floor, Adj. Men's Toilet, White/Beige Tile and "Black Jack" (8788/A4) 	**Photograph 4: Ground Floor, Room with Sauna, White/Beige Tile and Edging to Base of (all) Walls (Negative for Asbestos Content)** 
Photograph 5: Room East of the Cool Room, Water Heater, and Backing Board (8788/A7) 	**Photograph 6: Room East of the Cool Room, Base of Water Heater (8788/A6)** 

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Building/Location	
Photograph 7: Ground Floor, Room East of the Cool Room, Electrical Backing Board (8788/A7) 	**Photograph 8: Ground Floor, Small space, White/Beige, Red Floor Tiles and Adhesive (8788/A9).** 
Photograph 9: Air Conditioning Meter Room, Electrical Backing Board 	**Photograph 10: Air Conditioning Meter Room, Electrical Backing Board/s** 

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Table 4A: Photographs. Ground Floor Sunk Bar Area. Continued

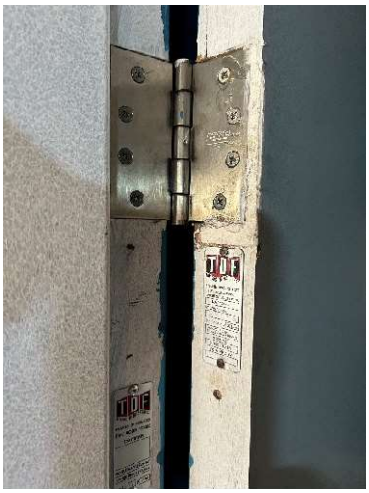
Building/Location	
Photograph 11: Sunk Bar GYM Area. Fire Doors Installed 2016	**Photograph 12: Sunk Bar, Stairwell Area. Fire Doors Installed 2016**
	

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Table 4B: Photographs. Mezzanine.

Building/Location	
Photograph 13: Mezzanine, looking South towards Bar, with Ceiling Tiles (8788/A16).	**Photograph 14: Mezzanine, Eastern Window, Putty and** *Brown Paint (8788/L4).*
	

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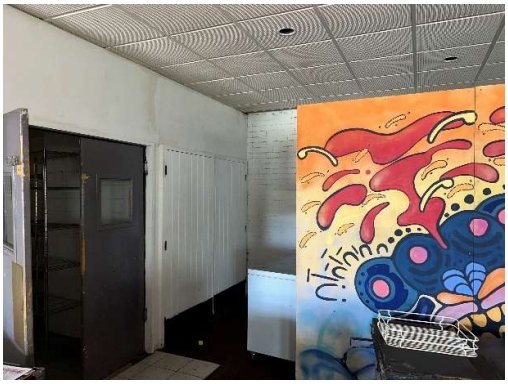
Table 4C: Photographs. Auditorium.

Building/Location	
Photograph 15: Auditorium, East 	**Photograph 16: Auditorium, West** 
Photograph 17: Auditorium, Eastern Windows, *Crème (8788/L7) and Orange Paint (8788/L8)* 	**Photograph 18: Auditorium, Eastern Windows,** *Orange Paint* **and Putty.** 
Photograph 19: Auditorium, Cupboard External to Kitchen 	**Photograph 20: Plant within Cupboard. Not Accessed.** 

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Building/Location	
Photograph 21: Auditorium, Southern side above Restaurant space, Insulation Above Ceiling, Mineral Fibre 	**Photograph 22: Auditorium, Southern end above Kitchen Seating, above ceiling tiles, length of W-E Beam, Cement sheeting affixed to side of Beam. Beige (8788/A44).** 
Photograph 23: Auditorium, Northern end of Auditorium. Mineral Fibre. No other Beams with sheeting affixed, observed. 	---

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Table 4D: Photographs. TAB, Main Foyer, "No Entry" Room, Main Entrance, Main Entrance Exterior, Office/Strong Room, Toilets

Building/Location	
Photograph 24: No Entry Room. Super Six Roofing visible above Ceiling Tiles (8788/A29) 	**Photograph 25: Main Foyer, Office to Strong Room, Ceiling Lining and Cornice (8788/A31 and A32)** 
Photograph 26: **Main Entrance, Exterior, Eastern side of entry, Infill Panel (8788/A43)** 	**Photograph 27: Main Entrance, Exterior, Eaves, White (8788/A34)** 

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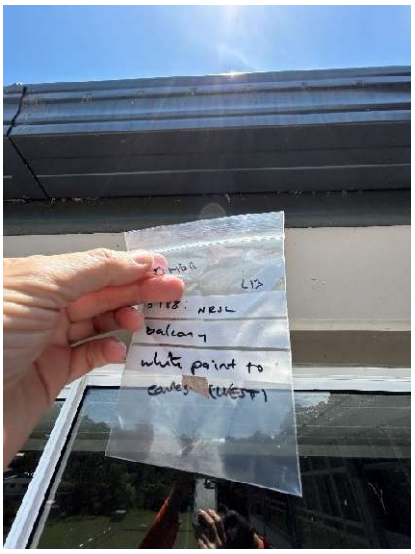
Table 4E: Secondary Entry Foyer, Telephone Room, Bar, Poker Machines and Balcony

Building/Location	
Photograph 28: Main Foyer, Bar, Wall Tile, South of Beer Taps (8788/A23). Adhesive Negative. 	**Photograph 29: Balcony, Balcony Awning, Paint, Dark Green (8788/L12)** 
Photograph 30: Balcony, Eaves, Paint, White (8788/L13) 	**Photograph 31: (Main Foyer), Super-Six Roofing, 8788/A29** 

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Building/Location	
Photograph 32: Main Foyer to Poker Machine Room, Super-Six Roofing (8788/A29) 	-
-	-

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Table 4F: Storage beneath Poker Machines [Accessed via Stairs behind Telephone Room]

Building/Location	
Photograph 33: Storage beneath Poker Machines, Toilet, Walls, Paint, Light Blue (8788/L15) 	**Photograph 34: Storage beneath Poker Machines, West of Exterior Storage Cage, Metal Pole, Blue (8788/L16)** 
Photograph 35: Storage beneath Poker Machines, Corridor, Paint, Crème (8788/L17) 	**Photograph 36: Storage beneath Poker Machines, Store 2 East, Paint, Light Green (8788/L18)** 

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Building/Location	
Photograph 37: Storage beneath Poker Machines, Store 2 East, Wine Room, Paint, Crème (8788/L19) 	**Photograph 38: Storage beneath Poker Machines, Stairs to Telephone Room and Poker Machines, Paint, Green (8788/L20) and Red (8788/L21)** 

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Table 4G: Office beneath Poker Machines, Whipper Snipper Garage

Building/Location	
Photograph 39: Office beneath Poker Machines Northern Room, Walls, Paint, White (8788/L27) 	**Photograph 40: "Whipper Snipper Garage", Southern Room, Garage, Western Wall, Sub-Floor (Access Hatch) (8788/A41) and EBB.** 
Photograph 41: "Whipper Snipper Garage", Southern Room, Garage, Western Wall, Sub-Floor (Access Hatch) (8788/A41) 	**Photograph 42: "Whipper Snipper Garage", Southern Room, Garage, Western Wall, Sub-Floor (Access Hatch) (8788/A41)** 

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Table 4F: Kitchen, External (Ground Floor beneath Poker Machines)

Building/Location	
Photograph 43: Kitchen, Southern Wall, Paint, White (8788/L23) 	-
-	-

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Appendix C 1: Detailed Sampling Methodology

Detailed Sampling Methodology

1. Purpose of Sampling

The purpose of sampling was to confirm the presence and type of hazardous materials, including asbestos, lead, and other contaminants, to inform safe demolition practices.

2. Sampling Procedures

2.1 Site Preparation:

- Inspection areas were reviewed to identify suspect materials based on visual characteristics and historical data.
- Safety measures were implemented, including isolating sampling areas where necessary.

2.2 Sample Collection:

- Asbestos-Containing Materials (ACM): Samples were collected using hand tools (e.g., chisels, scrapers) to obtain material fragments with minimal disturbance.
    - Special Note on Vermiculite Sampling.
        - Vermiculite sampling was conducted following a composite sampling method to ensure representative results across the inspected area.
- Lead-Based Paint: Paint samples were taken using a blade to capture multi-layer coatings for comprehensive analysis.
- Synthetic Mineral Fibers (SMFs): Insulation samples were extracted directly from ducts, ceiling voids, or piping.

2.3 Sample Handling:

- All samples were sealed in air-tight, labelled containers to prevent cross-contamination.
- Labels included a unique sample ID, date, location, and material type.

3. Laboratory Analysis

- **Standards Followed**:
    - **AS 4964:2004** for asbestos analysis.
    - **X-Ray Fluorescence (XRF)** and chemical digestion for lead.
    - Standard protocols for identifying PCBs and other hazardous chemicals.
- **Laboratory Accreditation:** All samples were analysed by a **NATA-accredited laboratory**, ensuring compliance with regulatory requirements.

4. Sample Identification

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- A unique identifier was assigned to each sample

Safety and Compliance

- All sampling was performed following the Safe Work Australia Code of Practice: How to Safely Remove Asbestos and related guidelines.
- Contaminated PPE and tools were decontaminated or disposed of as per regulatory requirements.

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Appendix C 2: Laboratory Analysis Certificates

Laboratory Analysis Certificates

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

CERTIFICATE OF ANALYSIS 367575

Client Details

Client	JN OHEB Services Pty Ltd
Attention	Jason North
Address	PO Box 567, Summer Hill LPO, SUMMER HILL, NSW, 2130

Sample Details

Your Reference	**P8788 - Narrabeen RSL**
Number of Samples	28 Paint
Date samples received	28/11/2024
Date completed instructions received	28/11/2024

Analysis Details

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

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

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

Report Details

Date results requested by	04/12/2024
Date of Issue	04/12/2024

NATA Accreditation Number 2901. This document shall not be reproduced except in full.

Accredited for compliance with ISO/IEC 17025 - Testing. **Tests not covered by NATA are denoted with ***

Results Approved By
Giovanni Agosti, Group Technical Manager

Authorised By
Nancy Zhang, Laboratory Manager

Lead in Paint						
Our Reference		367575-1	367575-2	367575-3	367575-4	367575-5
Your Reference	UNITS	8788/L1	8788/L2	8788/L3	8788/L4	8788/L5
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Paint	Paint	Paint	Paint	Paint
Date prepared	-	02/12/2024	02/12/2024	02/12/2024	02/12/2024	02/12/2024
Date analysed	-	03/12/2024	03/12/2024	03/12/2024	03/12/2024	03/12/2024
Lead in paint	%w/w	0.074	<0.005	<0.005	0.099	<0.005

Lead in Paint						
Our Reference		367575-6	367575-7	367575-8	367575-9	367575-10
Your Reference	UNITS	8788/L6	8788/L7	8788/L8	8788/L9	8788/L10
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Paint	Paint	Paint	Paint	Paint
Date prepared	-	02/12/2024	02/12/2024	02/12/2024	02/12/2024	02/12/2024
Date analysed	-	03/12/2024	03/12/2024	03/12/2024	03/12/2024	03/12/2024
Lead in paint	%w/w	<0.005	0.04	0.080	0.17	0.04

Lead in Paint						
Our Reference		367575-11	367575-12	367575-13	367575-14	367575-15
Your Reference	UNITS	8788/L11	8788/L12	8788/L13	8788/L14	8788/L15
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Paint	Paint	Paint	Paint	Paint
Date prepared	-	02/12/2024	02/12/2024	02/12/2024	02/12/2024	02/12/2024
Date analysed	-	03/12/2024	03/12/2024	03/12/2024	03/12/2024	03/12/2024
Lead in paint	%w/w	0.01	0.15	0.41	0.14	0.14

Lead in Paint						
Our Reference		367575-16	367575-17	367575-18	367575-19	367575-20
Your Reference	UNITS	8788/L16	8788/L17	8788/L19	8788/L20	8788/L21
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Paint	Paint	Paint	Paint	Paint
Date prepared	-	02/12/2024	02/12/2024	02/12/2024	02/12/2024	02/12/2024
Date analysed	-	03/12/2024	03/12/2024	03/12/2024	03/12/2024	03/12/2024
Lead in paint	%w/w	0.31	0.54	0.20	0.34	0.26

Lead in Paint						
Our Reference		367575-21	367575-22	367575-23	367575-24	367575-25
Your Reference	UNITS	8788/L22	8788/L23	8788/L24	8788/L25	8788/L26
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	26/11/2024
Type of sample		Paint	Paint	Paint	Paint	Paint
Date prepared	-	02/12/2024	02/12/2024	02/12/2024	02/12/2024	02/12/2024
Date analysed	-	03/12/2024	03/12/2024	03/12/2024	03/12/2024	03/12/2024
Lead in paint	%w/w	0.074	<0.005	<0.005	0.03	4.2

Lead in Paint				
Our Reference		367575-26	367575-27	367575-28
Your Reference	UNITS	8788/L27	8788/L28	8788/L18
Date Sampled		26/11/2024	26/11/2024	25/11/2024
Type of sample		Paint	Paint	Paint
Date prepared	-	02/12/2024	02/12/2024	02/12/2024
Date analysed	-	03/12/2024	03/12/2024	03/12/2024
Lead in paint	%w/w	0.081	0.098	0.19

Method ID	Methodology Summary
Metals-020/021/022	Digestion of Paint chips/scrapings/liquids for Metals determination by ICP-AES/MS and or CV/AAS.

QUALITY CONTROL: Lead in Paint						Duplicate			Spike Recovery %	
Test Description	Units	PQL	Method	Blank	#	Base	Dup.	RPD	LCS-1	[NT]
Date prepared	-			02/12/2024	6	02/12/2024	02/12/2024		02/12/2024	[NT]
Date analysed	-			03/12/2024	6	03/12/2024	03/12/2024		03/12/2024	[NT]
Lead in paint	%w/w	0.005	Metals-020/021/022	<0.005	6	<0.005	<0.005	0	98	[NT]

QUALITY CONTROL: Lead in Paint						Duplicate			Spike Recovery %	
Test Description	Units	PQL	Method	Blank	#	Base	Dup.	RPD	LCS-2	[NT]
Date prepared	-			[NT]	15	02/12/2024	02/12/2024		02/12/2024	[NT]
Date analysed	-			[NT]	15	03/12/2024	03/12/2024		03/12/2024	[NT]
Lead in paint	%w/w	0.005	Metals-020/021/022	[NT]	15	0.14	0.14	0	100	[NT]

QUALITY CONTROL: Lead in Paint						Duplicate			Spike Recovery %	
Test Description	Units	PQL	Method	Blank	#	Base	Dup.	RPD	[NT]	[NT]
Date prepared	-			[NT]	18	02/12/2024	02/12/2024		[NT]	[NT]
Date analysed	-			[NT]	18	03/12/2024	03/12/2024		[NT]	[NT]
Lead in paint	%w/w	0.005	Metals-020/021/022	[NT]	18	0.20	0.24	18	[NT]	[NT]

QUALITY CONTROL: Lead in Paint						Duplicate			Spike Recovery %	
Test Description	Units	PQL	Method	Blank	#	Base	Dup.	RPD	[NT]	[NT]
Date prepared	-			[NT]	28	02/12/2024	02/12/2024		[NT]	[NT]
Date analysed	-			[NT]	28	03/12/2024	03/12/2024		[NT]	[NT]
Lead in paint	%w/w	0.005	Metals-020/021/022	[NT]	28	0.19	0.16	17	[NT]	[NT]

Result Definitions

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

Quality Control Definitions

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

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

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

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

Laboratory Acceptance Criteria

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

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

Spikes for Physical and Aggregate Tests are not applicable.

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

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

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

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

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

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

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

Measurement Uncertainty estimates are available for most tests upon request.

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

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

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CERTIFICATE OF ANALYSIS 367577

Client Details

Client	JN OHEB Services Pty Ltd
Attention	Jason North
Address	PO Box 567, Summer Hill LPO, SUMMER HILL, NSW, 2130

Sample Details

Your Reference	**P8788 Narrabeen RSL**
Number of Samples	44 Material
Date samples received	28/11/2024
Date completed instructions received	28/11/2024

Analysis Details

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

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

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

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

Report Details

Date results requested by	05/12/2024
Date of Issue	05/12/2024

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Accredited for compliance with ISO/IEC 17025 - Testing. **Tests not covered by NATA are denoted with ***

Asbestos Approved By
Analysed by Asbestos Approved Analyst: Lucy Zhu
Authorised by Asbestos Approved Signatory: Lucy Zhu
Results Approved By
Lucy Zhu, Asbestos Supervisor

Authorised By
Nancy Zhang, Laboratory Manager

Asbestos ID - materials						
Our Reference		367577-1	367577-2	367577-3	367577-4	367577-5
Your Reference	UNITS	8788/A1	8788/A2	8788/A3	8788/A4	8788/A5
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	05/12/2024	05/12/2024	05/12/2024	05/12/2024	05/12/2024
Mass / Dimension of Sample	-	136.74g	357.85g	12x10x1mm	32x15x2mm	53x32x3mm
Sample Description	-	White mica vermiculite	White mica vermiculite	Brown fibrous material	A)Beige vinyl tile B)Black adhesive	Black vinyl tile & adhesive
Asbestos ID in materials	-	No asbestos detected	No asbestos detected	No asbestos detected Organic fibres detected	A)Chrysotile asbestos detected B)Chrysotile asbestos detected Organic fibres detected	No asbestos detected Organic fibres detected
Trace Analysis	-	No asbestos detected	No asbestos detected	No asbestos detected	A)[NT]; B)[NT]	No asbestos detected

Asbestos ID - materials						
Our Reference		367577-6	367577-7	367577-8	367577-9	367577-10
Your Reference	UNITS	8788/A6	8788/A7	8788/A8	8788/A9	8788/A10
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	05/12/2024	05/12/2024	05/12/2024	05/12/2024	05/12/2024
Mass / Dimension of Sample	-	23x20x5mm	10x10x1mm	77.01g	72x55x3mm	87x36x2mm
Sample Description	-	Beige fibre cement material	Black bituminous material	White mica vermiculite	A)Red vinyl tile B)Black adhesive	Brown fibrous material
Asbestos ID in materials	-	Chrysotile asbestos detected	Chrysotile asbestos detected	No asbestos detected	A)Chrysotile asbestos detected B)Chrysotile asbestos detected Organic fibres detected	No asbestos detected Organic fibres detected
Trace Analysis	-	[NT]	[NT]	No asbestos detected	A)[NT]; B)[NT]	No asbestos detected

Asbestos ID - materials						
Our Reference		367577-11	367577-12	367577-13	367577-14	367577-15
Your Reference	UNITS	8788/A11	8788/A12	8788/A13	8788/A14	8788/A15
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	05/12/2024	05/12/2024	05/12/2024	05/12/2024	05/12/2024
Mass / Dimension of Sample	-	30.71g	33x6x3mm	122x70x2mm	8x5x3mm	112x57x2mm
Sample Description	-	White mica vermiculite	Black mastic	Black vinyl tile & adhesive	Black mastic	Black vinyl tile
Asbestos ID in materials	-	No asbestos detected	No asbestos detected Organic fibres detected	No asbestos detected Organic fibres detected	No asbestos detected	No asbestos detected
Trace Analysis	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected

Asbestos ID - materials						
Our Reference		367577-16	367577-17	367577-18	367577-19	367577-20
Your Reference	UNITS	8788/A16	8788/A17	8788/A18	8788/A19	8788/A20
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	05/12/2024	05/12/2024	05/12/2024	05/12/2024	05/12/2024
Mass / Dimension of Sample	-	20x20x5mm	15x11x7mm	91x75x3mm	61x45x2mm	32x22x9mm
Sample Description	-	White plaster & fibrous material	Yellow mastic & paint	Beige vinyl tile & adhesive	White fibrous material & paint	Compressed fibrous material
Asbestos ID in materials	-	No asbestos detected Organic fibres detected Synthetic mineral fibres detected	No asbestos detected Organic fibres detected	No asbestos detected Organic fibres detected	No asbestos detected Synthetic mineral fibres detected	No asbestos detected Synthetic mineral fibres detected
Trace Analysis	-	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected	No asbestos detected

Asbestos ID - materials						
Our Reference		367577-21	367577-22	367577-23	367577-24	367577-25
Your Reference	UNITS	8788/A21	8788/A22	8788/A23	8788/A24	8788/A25
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	05/12/2024	05/12/2024	05/12/2024	05/12/2024	05/12/2024
Mass / Dimension of Sample	-	93x82x2mm	73x58x2mm	106x56x2mm	68x62x3mm	45x39x5mm
Sample Description	-	Grey vinyl tile & adhesive	Black vinyl tile	A)Beige vinyl tile B)Adhesive	A)Grey vinyl tile B)Adhesive	Beige fibrous plaster
Asbestos ID in materials	-	No asbestos detected Organic fibres detected	No asbestos detected Organic fibres detected	A)Chrysotile asbestos detected B)No asbestos detected	A)Chrysotile asbestos detected B)No asbestos detected	No asbestos detected Organic fibres detected
Trace Analysis	-	No asbestos detected	No asbestos detected	A)[NT]; B)No asbestos detected	A)[NT]; B)No asbestos detected	No asbestos detected

Asbestos ID - materials						
Our Reference		367577-26	367577-27	367577-28	367577-29	367577-30
Your Reference	UNITS	8788/A26	8788/A27	8788/A28	8788/A29	8788/A30
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	05/12/2024	05/12/2024	05/12/2024	05/12/2024	05/12/2024
Mass / Dimension of Sample	-	18x14x4mm	15x11x5mm	15x14x3mm	29x17x4mm	84x64x2mm
Sample Description	-	Beige fibre cement material	Grey fibre cement material	Beige fibre cement material	Grey fibre cement material	Beige vinyl tile & adhesive
Asbestos ID in materials	-	No asbestos detected Organic fibres detected	No asbestos detected Organic fibres detected	Chrysotile asbestos detected Organic fibres detected	Chrysotile asbestos detected Amosite asbestos detected	No asbestos detected Organic fibres detected
Trace Analysis	-	No asbestos detected	No asbestos detected	[NT]	[NT]	No asbestos detected

Asbestos ID - materials						
Our Reference		367577-31	367577-32	367577-33	367577-34	367577-35
Your Reference	UNITS	8788/A31	8788/A32	8788/A33	8788/A34	8788/A35
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	05/12/2024	05/12/2024	05/12/2024	05/12/2024	05/12/2024
Mass / Dimension of Sample	-	26x12x3mm	177x87x7mm	85x32x1mm	33x29x6mm	52x45x2mm
Sample Description	-	Beige fibre cement material	Grey fibre cement material	Patterned vinyl sheet	Beige fibre cement material	Pink vinyl tile & adhesive
Asbestos ID in materials	-	Chrysotile asbestos detected Amosite asbestos detected	Chrysotile asbestos detected Amosite asbestos detected	No asbestos detected	Chrysotile asbestos detected	No asbestos detected Organic fibres detected
Trace Analysis	-	[NT]	[NT]	No asbestos detected	[NT]	No asbestos detected

Asbestos ID - materials						
Our Reference		367577-36	367577-37	367577-38	367577-39	367577-40
Your Reference	UNITS	8788/A36	8788/A37	8788/A38	8788/A39	8788/A40
Date Sampled		25/11/2024	25/11/2024	25/11/2024	25/11/2024	25/11/2024
Type of sample		Material	Material	Material	Material	Material
Date analysed	-	05/12/2024	05/12/2024	05/12/2024	05/12/2024	05/12/2024
Mass / Dimension of Sample	-	70x50x5mm	70x60x5mm	15x13x3mm	134x97x7mm	37x26x8mm
Sample Description	-	Grey fibre cement material	Grey fibre cement material	Grey fibre cement material	Grey fibre cement material	Bituminous material
Asbestos ID in materials	-	No asbestos detected Organic fibres detected	No asbestos detected Organic fibres detected	No asbestos detected Organic fibres detected	Chrysotile asbestos detected Amosite asbestos detected	Chrysotile asbestos detected Organic fibres detected
Trace Analysis	-	No asbestos detected	No asbestos detected	No asbestos detected	[NT]	[NT]

Asbestos ID - materials					
Our Reference		367577-41	367577-42	367577-43	367577-44
Your Reference	UNITS	8788/A41	8788/A42	8788/A43	8788/A44
Date Sampled		26/11/2024	26/11/2024	26/11/2024	25/11/2024
Type of sample		Material	Material	Material	Material
Date analysed	-	05/12/2024	05/12/2024	05/12/2024	05/12/2024
Mass / Dimension of Sample	-	25x18x8mm	33x17x5mm	74x51x5mm	24x20x4mm
Sample Description	-	Grey fibre cement material	Grey fibrous sheet	Grey fibre cement material	Beige fibre cement material
Asbestos ID in materials	-	Chrysotile asbestos detected Amosite asbestos detected	No asbestos detected Organic fibres detected	Chrysotile asbestos detected Organic fibres detected	Chrysotile asbestos detected Organic fibres detected
Trace Analysis	-	[NT]	No asbestos detected	[NT]	[NT]

Method ID	Methodology Summary
ASB-001	Asbestos ID - Qualitative identification of asbestos in bulk samples using Polarised Light Microscopy and Dispersion Staining Techniques including Synthetic Mineral Fibre and Organic Fibre as per Australian Standard 4964-2004.

Result Definitions

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

Report Comments

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

Samples 367577-4, 9, 23, 24; The supplied samples were sub-sampled (A & B) in order to accurately report the analytical results representative of the entire sample, as per AS4964-2004.

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Appendix D 1: Limitations: Project Specific

Limitations: Project Specific

9. Scope of Services

- The findings and recommendations in this report are based solely on the agreed scope of services outlined in the proposal. This report does not extend to conditions, assessments, or services beyond the specified scope unless explicitly agreed upon in writing.
- This report focuses exclusively on the identification, assessment, and recommended management of hazardous materials for pre-demolition purposes. It does not include detailed design, legal interpretation, or compliance guarantees.
- While every effort is made to conduct surveys in a professional and thorough manner, it is not possible to guarantee that all asbestos or hazardous materials will be identified. Additionally, we cannot ensure that this report will meet the specific requirements of third parties (e.g., local councils) unless their requirements are provided in writing prior to the survey. We reserve the right to review and adjust our proposal and fees based on any additional requirements specified.

10. Observations and Conditions

- The conclusions are derived from conditions observed during the inspection. Areas that were inaccessible, restricted, or not surveyed due to safety, logistical, or structural constraints may contain unidentified hazardous materials. Further inspections may be necessary as demolition progresses.
- Sampling and analysis are limited to visible or accessible materials at the time of inspection. Hidden or latent hazardous materials not accessible during this process may remain unidentified.

11. Third-Party Data and Reliance

- This report relies on information provided by the client, third-party contractors, and external data sources, including site plans, historical reports, and laboratory analyses. OHEB Services is not liable for inaccuracies, omissions, or errors in third-party data.
- Laboratory results from NATA-accredited facilities are incorporated as submitted, and OHEB assumes no responsibility for any discrepancies or errors in the analysis provided.

12. Regulatory Compliance

- This report references applicable legislation, standards, and codes of practice relevant to pre-demolition hazardous materials management. While the recommendations aim to align with these guidelines, it is the responsibility of the client and demolition contractor to ensure compliance with all regulatory requirements.
- OHEB Services does not guarantee regulatory approvals or certifications unless explicitly agreed upon as part of the scope.

13. Advisory Role

- The services provided by OHEB Services are advisory in nature. Implementation of recommendations should be carried out under the supervision of appropriately qualified and certified professionals.
- This report does not substitute for detailed engineering, legal, or regulatory advice. Additional expertise should be sought for critical compliance matters or design decisions.

14. Liability and Limitations

- OHEB's liability is limited to the fees charged for the preparation of this report, as outlined in the Terms of Agreement. OHEB is not liable for indirect, consequential, or economic losses resulting from reliance on this report.
- The client assumes responsibility for ensuring safe and uninterrupted access to the site, as well as compliance with site-specific safety protocols.

15. Confidentiality and Use

- This report is intended for the exclusive use of the client for the purposes specified. Unauthorized use, reproduction, or dissemination of this document is prohibited.
- Use of this report by third parties or for purposes beyond the intended scope is at the user's own risk.

16. Unforeseen Conditions

- Should unexpected hazardous materials be encountered during demolition, immediate action should be taken to suspend works in the affected area until an assessment can be conducted. An "Unexpected Finds Protocol" has been included to guide such scenarios.

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Appendix D 2: Limitations: General

Limitations: General

Advisory Role

The services provided by **JN OHEB Services Pty Ltd (OHEB)** are advisory in nature. This report contains recommendations and guidance based on professional judgment, industry standards, and the data available at the time of assessment.

Implementation of any recommendations should be undertaken under the supervision of appropriately qualified professionals or specialists in relevant fields.

This report does not substitute for detailed legal, engineering, or regulatory advice. For critical compliance matters or design decisions, clients are encouraged to seek additional expertise as required.

This report has been prepared by OHEB in accordance with the terms outlined in the OHEB Terms of Agreement (TOA) and the scope of work defined therein. The findings, conclusions, and recommendations are subject to the following limitations:

17. **Purpose and Use**
    - This report is intended solely for the purpose described in the scope of work and for the exclusive use of Rick Davis Contracting Pty Ltd. It must not be used for any other purpose or by any third party without the prior written consent of OHEB.
    - Any reliance on this report beyond its intended purpose or by unauthorised parties is entirely at the user's own risk.
18. **Alignment with Terms of Agreement**
    - The services provided, and any limitations herein, align with the TOA between OHEB and the client. These terms govern the scope, fees, and liabilities associated with this report and any related services.
    - Variations to the agreed scope or requirements must be discussed and approved in writing, as per the TOA.
19. **Reliance on Third-Party Data**
    - This report incorporates data and information provided by the client, third parties, or external sources. OHEB assumes no responsibility for errors, omissions, or inaccuracies in such data.
    - All conclusions and recommendations are contingent upon the accuracy and reliability of the information provided.
20. **Scope of Services**
    - The findings and recommendations in this report are based on the specific conditions and requirements outlined in the scope of work. This report does not extend to conditions, services, or assessments outside the agreed scope.

- The report does not constitute a compliance audit, detailed design, or guarantee of regulatory approval unless explicitly stated.

21. Observations and Conditions

- The findings reflect conditions observed during the assessment period and may not account for future changes in site conditions, regulations, or standards.
- Restricted access to certain areas may have limited the scope of the assessment. Such limitations are noted within the report.

22. Standards and Guidelines

- This report has been prepared in accordance with applicable Australian standards, regulations, and industry guidelines that are reasonably known and available as of the date of preparation.
- While every effort has been made to ensure compliance with relevant documents, it is possible that some standards, guidelines, or requirements may not have been fully considered or applied due to their complexity, availability, or relevance at the time of preparation.
- Any changes to these standards or regulations after this date may require additional review or updates to the report.

23. Client Responsibilities

- The client is responsible for ensuring:
  - The safe and unrestricted access to all areas required for the performance of the services.
  - Compliance with regulatory requirements not explicitly addressed within this report.
  - Timely communication of changes in site conditions or project scope.
- Implementation of recommendations must be carried out under the supervision of qualified professionals, as required.

24. Liability

- OHEB's liability is governed by the terms outlined in the TOA and is limited to the professional fees charged for the preparation of this report unless otherwise agreed in writing.
- OHEB is not liable for:
  - Unauthorised use of this report.
  - Delays or damages caused by third-party data inaccuracies or scope changes.
  - Indirect, economic, or consequential losses resulting from reliance on this report.

25. Confidentiality

- This report contains confidential and proprietary information intended solely for the client. Unauthorised dissemination, reproduction, or reliance on this document is prohibited.

26. No Warranty

- No warranty, expressed or implied, is provided for the information, findings, or recommendations included in this report beyond the obligations defined in the TOA.

Final Note

This report represents the findings and professional judgment of OHEB based on the information available and the conditions observed at the time of the assessment. For any further interpretation, compliance validation, or services beyond the scope of this report, the client should engage the appropriate specialists as required.

Key Notes on Limitations

- The report is advisory in nature and intended solely for pre-demolition planning.
- It is based on conditions observed at the time of inspection and the data provided.
- Areas not inspected may contain unidentified hazardous materials. Further inspections may be required as demolition progresses.

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Regulatory References

Legislation

1. Work Health and Safety Act 2011 (WHS Act)
2. Work Health and Safety Regulation 2011 (WHS Regulation)
3. Protection of the Environment Operations Act 1997 (POEO Act)
4. Protection of the Environment Operations (Waste) Regulation 2014
5. Environmental Planning and Assessment Act 1979 (EP&A Act)

Codes of Practice

6. How to Manage and Control Asbestos in the Workplace (SafeWork NSW, 2022)
7. How to Safely Remove Asbestos (Safe Work NSW, 2022)
8. Managing Risks of Hazardous Chemicals in the Workplace (Safe Work Australia, 2021)
9. Code of practice for the safe use of synthetic mineral fibres [NOHSC: 2006(1990)]

Standards

10. AS/NZS 4801:2001 Occupational Health and Safety Management Systems
11. AS/NZS 1716:2012 Respiratory Protective Devices
12. AS 4964:2004 Method for the Qualitative Identification of Asbestos in Bulk Samples
13. AS 2601:2001 The Demolition of Structures
14. AS 2187.2-2006 Explosives - Storage and Use
15. AS/NZS ISO 14001:2016 Environmental Management Systems - Requirements with Guidance for Use

Guidelines

16. National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPM, amended 2013)
17. Interim Construction Noise Guideline (ICNG) (DECC, 2009)
18. NSW Noise Policy for Industry (NPfI) (EPA, 2017)
19. Construction Noise and Vibration Guideline (CNVG) (RMS, 2016)
20. Environmental Noise Management - Assessing Vibration: A Technical Guideline (DEC, 2006)

Best Practice Guidance

21. A Comprehensive Guide to Managing Asbestos in Premises (HSG 227)

22. Asbestos: The Survey Guide (HSG 264)
23. Draft National Guide for Asbestos Surveys - For Public Comment (September 2024)
24. Hazardous Materials Survey Guide (April 2018)

Please note that the above list is not exhaustive and there may be additional relevant documents and standards that should be considered. The placement of the above list does not constitute a comprehensive or detailed review of the guidance documents, legislation, and standards mentioned herein.

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Appendix F: Hazardous Materials

Hazardous Materials

This appendix outlines key considerations for managing hazardous materials, including asbestos, lead, polychlorinated biphenyls (PCBs), and associated protocols for the Narrabeen RSL and carpark demolition project. These procedures ensure compliance with Australian regulations and best practices, safeguarding workers, the public, and the environment.

1. Asbestos Management

Asbestos-containing materials (ACMs) pose significant health risks when disturbed, releasing fibres that can cause severe diseases. Demolition and construction projects must comply with **Work Health and Safety Regulation 2017 (NSW)**, **AS 2601-2001**, and **SafeWork NSW** guidelines.

Key Requirements:

- **Competent Persons:** Required for inspections, handling, and removal of non-friable ACMs, such as bonded asbestos cement sheeting. Competent persons must have the necessary training, experience, and knowledge as defined by SafeWork NSW.
- **Licensed Asbestos Assessors (LAAs):** Mandatory for handling and removing friable ACMs, which pose a greater risk of fibre release. LAAs are responsible for risk assessments, air monitoring, and issuing clearance certificates.
- **Asbestos Removal Control Plan (ARCP):** Required for all ACM removals, outlining safe handling, containment, and disposal procedures.
- **Air Monitoring:** Conducted by a NATA-accredited laboratory during friable asbestos removal and as required for high-risk non-friable works.
- **Clearance Inspections:** Performed by an LAA after friable removal or a competent person for non-friable removal to confirm the area is safe and free from asbestos contamination.

2. Lead Management

Lead-containing materials, commonly found in old paint, dust, and soil, present risks to workers and the environment. This project adheres to **AS 4361.2-2017** and WHS Regulations.

Key Requirements:

- **Competent Persons:** Handle risk assessments, removal, and management of lead-containing materials. They must be trained and experienced in hazardous materials management.
- **Lead Air Monitoring:** Conducted to ensure airborne lead concentrations remain below SafeWork Australia guidelines during removal activities.
- **Lead Removal Control Plan:** Details safe removal methods, such as chemical stripping or wet sanding, to minimise lead dust generation.
- **Clearance Inspections:** Performed post-removal to verify no residual lead contamination.

3. **Polychlorinated Biphenyls (PCBs)**

PCBs, historically used in electrical equipment, pose environmental and health risks if not properly managed.

Key Considerations:

- **Identification:** Pre-demolition surveys must identify PCB-containing equipment, such as transformers or capacitors.
- **Safe Removal and Disposal:** Licensed waste contractors must remove PCBs and dispose of them at approved facilities.
- **Documentation:** Maintain waste manifests and disposal records to comply with NSW EPA guidelines.

4. **Synthetic Mineral Fibre (SMF)**

- **Definition:** Synthetic Mineral Fibre (SMF) refers to fibrous materials made from glass, rock, slag, or ceramic, commonly used in insulation and construction applications.
- **Health Risks:**
  - Exposure to SMF dust can cause irritation to the eyes, skin, and respiratory tract.
  - While less hazardous than asbestos, prolonged exposure without appropriate controls may pose health risks.
- **Key Applications:**
  - Thermal and acoustic insulation in buildings.
  - Reinforcement materials in plaster, cement, and plastics.
- **Handling and Management:**
  - Minimise disturbance during removal or demolition to reduce fibre release.
  - Use wet methods or local exhaust ventilation (LEV) to control dust emissions.
  - Ensure proper disposal in accordance with NSW EPA waste classification guidelines.
- **Personal Protective Equipment (PPE):**
  - Use disposable coveralls, gloves, and appropriate respiratory protection (e.g., P2 or P3 respirators).
  - Wash exposed skin thoroughly to remove fibres.
- **Standards and Codes of Practice:**
  - **Work Health and Safety Regulation 2017 (NSW):** General requirements for managing risks associated with hazardous chemicals and materials.
  - **National Code of Practice for the Safe Use of Synthetic Mineral Fibres (1990)**: Provides guidance on safe handling, installation, and removal of SMFs.

- **AS/NZS 1716**: Specifies requirements for respiratory protection used during SMF handling.
- **Safe Work Australia Guidance Material**: Recommendations for working safely with fibrous materials, including SMF.

- **Recommendations:**
  - Conduct risk assessments before handling or removing SMF materials.
  - Provide training to workers on safe handling practices.
  - Monitor and document workplace exposure levels, ensuring compliance with safety standards.

5. Hazardous Materials Documentation

The following documents are critical to managing hazardous materials during demolition:

1. Asbestos and Lead Removal Control Plans**:**
   - Developed by competent persons for non-friable works and LAAs for friable works.
   - Includes safety measures, containment methods, and responsibilities.
2. Management Plans:
   - Provide long-term strategies for managing hazardous materials, including maintenance schedules and emergency protocols.
3. Unexpected Finds Protocol:
   - Ensures immediate cessation of work upon discovering hazardous materials.
   - Involves risk assessment, containment, and safe management by licensed professionals.
4. Clearance Inspections and Certificates:
   - Conducted by an LAA for friable asbestos and a competent person for non-friable asbestos or lead.
   - Confirms the site is safe for re-occupation or further work.

6. JN OHEB Services: Expertise and Availability

JN OHEB Services brings extensive expertise in hazardous materials management for demolition projects. Our team includes:

- **Licensed Asbestos Assessors (LAAs):** Specialising in friable asbestos works, risk assessments, air monitoring, and clearance inspections.
- **Competent Persons:** Managing non-friable ACMs, lead-containing materials, and other hazardous substances.
- **NATA-accredited Air Monitoring:** Providing air monitoring services for asbestos.

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- **Air Monitoring:** Providing air monitoring services lead and respirable crystalline silica to ensure worker safety.
- **Document Preparation:** Developing ARCPs, management plans, and clearance certificates in compliance with regulations.

We are ready to assist with all aspects of hazardous materials management for this project, ensuring compliance with regulatory standards and best practices.

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Appendix G: Unexpected Finds Protocol

Unexpected Finds Protocol

Purpose

The purpose of this protocol is to establish clear procedures for managing unexpected finds of hazardous materials, including asbestos-containing materials (ACMs), during the demolition works at Narrabeen RSL and carpark. This ensures compliance with Australian standards, codes of practice, and regulatory requirements while prioritising health, safety, and environmental protection.

Scope

This protocol applies to all personnel, contractors, and subcontractors involved in the demolition works. It covers the identification, reporting, containment, and management of any unexpected hazardous materials encountered during demolition.

Relevant Standards and References

- AS 2601-2001: The Demolition of Structures.
- **AS 4964-2004:** Method for the qualitative identification of asbestos in bulk samples.
- **Code of Practice:** How to Manage and Control Asbestos in the Workplace (SafeWork Australia, 2019).
- **Code of Practice:** How to Safely Remove Asbestos (SafeWork Australia, 2019).
- NSW Work Health and Safety Regulation 2017.
- NSW Protection of the Environment Operations Act 1997.

Procedure for Managing Unexpected Finds

1. Stop Work Immediately:

- Cease all demolition activities in the immediate vicinity of the suspected hazardous material.
- Restrict access to the area to prevent unintentional disturbance.

2. Notify the Site Supervisor:

- Inform the site supervisor immediately about the discovery.
- The site supervisor will initiate the protocol and notify relevant stakeholders, including:
  - Licensed Asbestos Assessor (LAA).
  - Environmental consultant (if required).

3. SafeWork NSW (if applicable).Secure the Area:

- Erect warning signs and barriers around the affected area.
- Use plastic sheeting or equivalent material to cover the find if safe to do so, preventing further release of hazardous material.

4. Assessment by Competent Person:

- A competent person (e.g., Licensed Asbestos Assessor) must inspect the material and determine:
  - The type and extent of the material.
  - Immediate risks to workers and the environment.
  - Appropriate control measures.

5. Sampling and Testing:

- Collect samples of the suspected material following AS 4964-2004 protocols.
- Submit samples to a NATA-accredited laboratory for analysis.

6. Notification to Authorities (if required):

- If ACMs are confirmed, notify SafeWork NSW as per regulatory requirements.
- Update the site's Asbestos Register with the findings.

7. Control Measures:

- Implement appropriate control measures based on the findings, which may include:
  - Wetting down friable ACMs to suppress dust.
  - Engaging a licensed asbestos removalist to remove the material.
  - Air monitoring during removal activities.

8. Waste Management:

- Collect and store ACMs in labelled, sealed containers as per NSW EPA guidelines.
- Dispose of ACMs at an EPA-licensed facility in compliance with waste management regulations.

9. Clearance and Documentation:

- Obtain a clearance certificate from the Licensed Asbestos Assessor after removal of the material.
- Document the incident and update the project records, including:
  - Location of the find.
  - Actions taken.
  - Analytical results.
  - Clearance documentation.

Specific Considerations for the Site

- Below-Ground ACMs**:**
  - Likely occurrences include asbestos cement sheeting (fill, formwork) and pipes.

- Excavation must proceed cautiously with visual inspections at regular intervals.
- Mechanical excavation near suspect materials must stop if ACMs are encountered.

- **Environmental Protection**:
  - Use spill trays or containment to prevent runoff of contaminated materials.
  - Monitor nearby drainage points for potential contamination.

Roles and Responsibilities

- Site Supervisor:
  - Oversee the implementation of the protocol.
  - Communicate with contractors, consultants, and authorities.
- Licensed Asbestos Assessor:
  - Assess and manage ACMs found on-site.
  - Provide guidance and clearance certificates.
- Contractors and Workers:
  - Report any suspicious materials immediately.
  - Follow safety instructions and wear appropriate PPE.

Emergency Contacts

- **Site Supervisor**: [Insert name and phone number]
- **Licensed Asbestos Assessor**: [Insert name and phone number]
- **Environmental Consultant**: [Insert name and phone number]
- **SafeWork NSW Emergency Line**: 13 10 50
- **EPA Hazardous Waste Hotline**: [Insert number]

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Appendix G: OUR SERVICES

OUR SERVICES

At OHEB, we are committed to providing specialised services that prioritise safety, compliance, and efficiency across industries. Our services include Hazardous Materials Management, Occupational Hygiene Personnel Development and Wellbeing, Client Relationship Management (CRM) Enhancement, Strategic Business Development, and Systems Development and Implementation. With a comprehensive approach, we help your business remain competitive, safe, and client-focused, fostering long-term success and stability.

Table 11: Services

Available Services	
Hazardous Materials Management • Hazardous materials surveys • Asbestos and hazardous materials management • Emergency response.	**Occupational Hygiene** • Airborne Contaminants, including asbestos, lead, dust, respirable crystalline silica and mould. • Noise monitoring • RPE fit testing
Strategic Business Development • Market analysis and growth strategy formulation. • New business opportunity identification • New Business pursuit. • Sales and marketing strategy development.	**Client Relationship Management (CRM) Enhancement** • CRM system selection and implementation. • Client engagement strategies. • Customer service improvement plans.
Personnel Development and Wellbeing • Employee training and development programs. • Wellbeing initiatives and support services. • Performance management systems.	**Systems Development and Implementation** • Business process analysis and optimisation. • Implementation of efficient and scalable business systems. • Ongoing support and system maintenance.

- **Hazardous Materials Management**

Our Hazardous Materials Management services are designed to help businesses safely identify, manage, and mitigate risks associated with hazardous substances. We conduct comprehensive asbestos surveys, including identification, sampling, and the creation of asbestos registers and management plans. Additionally, our hazardous materials

surveys detect risks from substances like lead, polychlorinated biphenyls (PCBs), and synthetic mineral fibres (SMFs). For sites with contamination issues, we offer assessment, remediation planning, and environmental monitoring to validate safety. Our emergency response services provide on-site support and tailored incident management plans for hazardous materials incidents, ensuring quick and effective risk control.

- **Occupational Hygiene**

Our Occupational Hygiene services focus on creating safer workplaces by monitoring and controlling environmental hazards that impact worker health. Our assessments identify a range of contaminants, including asbestos, lead, dust, respirable crystalline silica, and mould. We also provide RPE fit testing to ensure compliance and effectiveness of respiratory protective equipment. Each service is tailored to meet regulatory standards, safeguarding workforce wellbeing and promoting a healthy work environment

- **Strategic Business Development**

Strategic Business Development includes market analysis, growth strategy formulation, and new business opportunity identification. By developing targeted sales and marketing strategies, we help your business expand sustainably, improve market presence, and secure competitive advantages.

- **Client Relationship Management (CRM) Enhancement**

CRM Enhancement involves selecting and implementing CRM systems, developing engagement strategies, and optimising customer service. Effective CRM supports efficient client communication, improves satisfaction, and fosters loyalty, which drives long-term growth.

- **Personnel Development and Wellbeing**

Personnel Development focuses on enhancing skills and wellbeing through training programs, support initiatives, and performance management. Investing in personnel development fosters a productive culture and increases retention, ensuring high-quality service delivery and client satisfaction.

- **Systems Development and Implementation**

Systems Development optimises business processes, implements scalable solutions, and provides ongoing support. Efficient systems increase productivity by automating routine tasks and facilitating growth, enabling your business to focus on strategic priorities.
