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14 October 2022

Mr John Sabbouh
Richard Crookes Constructions
Level 3, 4 Broadcast Way
Artarmon NSW 2064

**RE: EXCAVATION AND RELOCATION OF ASBESTOS AND / OR PESTICIDE CONTAMINATED
FILL SOIL FROM THE AREA OF THE FORMER CHAPEL BUILDING AT ST JOHN OF
GOD RICHMOND HOSPITAL, 177 GROSE VALE ROAD, NORTH RICHMOND NSW**

Dear Sir,

We refer to our recent visual inspections, soil sampling and discussions undertaken in regard to the identification of asbestos cement sheet and / or organochlorine pesticides (OCP) in and around the area of the former chapel building located within the Richard Crookes Constructions site area at the St John of God Richmond Hospital at 177 Grose Vale Road, North Richmond NSW (the site).

Following demolition of the concrete floor slab of the former chapel building, fill soil that was exposed has been found to contain fragments of asbestos cement sheet debris. This soil was scrapped and stockpiled to allow for waste classification sampling and analysis of a sample of this soil was found to contain elevated level of OCP which classified this soil as hazardous waste.

Following receipt of this result, further soil sampling has been carried out to ascertain the extent of in-situ OCP contaminated soil and the results of this sampling have found OCP to be present above the site acceptance criteria in fill soil in the former chapel building area and surrounding area to depths of between 0.25 metre and 0.5 metre.

Due to the quantity of this OCP contaminated soil and the presence of asbestos material debris in this fill soil, the client has requested that the fill soils in this area of the site be excavated and relocated to dedicated burial cells within the site.

Scope of Soil Relocation Work

The following scope of work is to be completed to remove the asbestos and / or OCP contaminated fill soils (contaminated soil) from area on and surrounding the location of the former chapel building.

1. The removal of the fill soil containing asbestos cement sheet debris is classifiable as non-friable asbestos removal work and may be carried out using the existing non-friable asbestos removal notification for the buildings within the demolition area at the site.
2. A barricade with asbestos warning signs is to be erected around the contaminated soil removal work areas at the site.

3. A decontamination and change area is to be established at the entry to the contaminated soil removal work areas.
4. Water spray is to be used to control dust generated by the work. Work should not be undertaken during periods of high wind that could carry dust potentially containing asbestos fibres or OCP dust into adjoining areas.
5. The burial cells are to be excavated in the nominated area(s) of the site to the size required to accept all of the contaminated fill soils and the final capping layer of 0.5 – 1.0 metre. The upper one metre of soil from each burial cell is to be stockpiled adjacent to the cell for reuse as capping over the contaminated fill soil.
6. The burial cells are to be lined with orange coloured geo-fabric the sides and base with sufficient fabric to wrap over the top of the cell.
7. Fill soil containing asbestos material contamination is to be placed into a separate cell to soil which contains both asbestos and OCP contamination.
8. The fill soil containing fragments of asbestos cement sheet debris and / or OCP contaminated soil is to be scrapped and stockpiled to allow for the soil to be loaded into trucks for relocation to the burial cells.
9. The fill soil is to be placed into the burial cells in layers of 150 – 200mm with each layer to be compacted to minimise settlement after the relocation work is completed.
10. At the completion of the placement of the fill soil in the burial cells, the fabric is to be placed over the surface of the fill soil with overlaps of 200mm – 250mm. The fabric is to be pinned in place using steel pegs.
11. The cells are to be capped with soil that was removed from the upper one metre in the cell area.
12. Surveying of the burial cell areas is to be undertaken to document the area for inclusion in the long term environmental management plan (LTEMP).
13. Photographs of the work are to be collected for inclusion in the LTEMP.
14. At the completion of the work the areas from which the fill soil was removed are to be inspected and validation samples collected to verify that the remaining soil is free of asbestos and / or the level of OCP is below the site acceptance level. A validation report is to be compiled detailing the scope of the completed work, the findings of the validation inspection and soil sample analysis results.
15. A LTEMP is to be prepared for the burial cell area and this plan is to be provided to the client with details of the plan to be recorded on the planning certificate for the site.



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Requirements for Non-Friable Asbestos and OCP Contaminated Soil Relocation Work

The contaminated soil excavation and relocation work shall be contained within the location of the former chapel building and the burial cell areas within the St John of God Richmond Hospital site at 177 Grose Vale Road, North Richmond NSW.

Prior to the commencement of asbestos removal work, the Class A or Class B licenced asbestos removal contractor is to prepare a project specific Asbestos Management Plan for the removal of the asbestos contaminated soil and burial of the soil at the site in accordance with the requirements of section 3.5 of the How to Safely Remove Asbestos Code of Practice issued by the NSW Government in August 2019. This asbestos removal control plan is to be kept on site for the duration of the asbestos removal work.

A barricade is to be erected around the area where the contaminated soil is to be excavated. Asbestos removal warning signs are to be placed on this barricade. Warning signs are to be placed at the entry to the asbestos removal work area and should read "Asbestos Work Area, No Unauthorised Entry". These signs are to comply with Australian Standard 1319-1983: Safety signs for the occupational environment.

A change and decontamination area is to be located at the entry to the contaminated soil excavation and burial work areas. All persons entering these areas are to change into protective equipment in the change area and undergo decontamination prior to leaving the work area. All PPE is to be removed in the decontamination area when exiting the contaminated soil excavation and burial work areas.

The contractor will be liable for all damage caused during the work to construction materials, services, etc. that do not form part of this scope of work. Should any damage occur during the course of the contaminated soil excavation and burial work, all costs associated with the repairs to the affected areas will be met by the asbestos removal contractor.

Training and Health Assessment

The asbestos removal contractor shall provide instruction to all persons involved in the work that may be exposed to asbestos and OCP in the course of the work regarding the danger to health and the statutory requirements that are required to provide safe working conditions.

The asbestos contractor's staff involved with the removal of the asbestos containing materials must also be formally trained in safe non-friable asbestos removal working procedures and in the wearing and maintenance of protective clothing and equipment.



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The supervisor on the site is to have completed formal training in the supervision of non-friable asbestos removal. Evidence of this training must be held on site. The non-friable asbestos removal supervisor is to be on site at all times during the removal of the non-friable asbestos contaminated soil.

All persons involved in the licenced asbestos removal work are to have completed current health assessments in accordance with Clauses 435 and 436 of the NSW WHS Regulation 2017.

Personal Protective Equipment

All persons entering the work areas (to undertake contaminated soil excavation and burial work) are to wear disposable coveralls, Class P2 or P3 respiratory protective equipment (RPE) and washable laceless boots or disposable boot covers.

RPE is to be issued to each person entering the work area and are to be cleaned prior to leaving the asbestos work area.

Persons entering the work areas for supervision or inspection of the work are to wear disposable coveralls, RPE and washable laceless boots.

All persons entering the work area are to be instructed on the correct fit and wearing of the RPE. No person with a beard shall be permitted to enter an asbestos removal work area.

Disposable items of PPE are not to be taken outside of the asbestos removal work area.

The laundering of approved reusable protective clothing shall be carried out in accordance with the procedures approved by SafeWork NSW. Waste water from washing of contaminated clothing is to be filtered prior to disposal to the sewer and clothes dryers used for drying clothes or towels are to be filtered through a HEPA filter.

Decontamination Facilities

For the removal of non-friable asbestos containing and contaminated soil and / or OCP contaminated soil, a designated decontamination area is to be established at the entry to each of the excavation and burial areas. All persons entering these areas are to change into / out of their PPE in the designated decontamination area. Wet shower facilities are not a mandatory requirement for non-friable asbestos removal, however they may be provided by the contractor if they wish to do so.

When leaving the work area, the following decontamination procedure is to be followed:

- Remove any visible dust / residue from protective clothing using an Class H rated HEPA filtered vacuum cleaner or wiping down with damp cloths. Warning: do not reuse or resoak damp cloths.
- Carefully remove disposable protective clothing and place into bags, (RPE must still be worn).
- Place cloths into asbestos waste disposal plastic bag (200µm thick).
- Take disposable coveralls off and place into asbestos waste disposal bag (RPE must still be worn).
- Use damp cloths to wipe down footwear and place cloths into asbestos waste disposal bag.
- Seal all asbestos waste plastic bags with duct tape and place each into a second plastic bag.
- Seal this second plastic bag and label/mark as 'Asbestos Waste'.
- Use damp rags to wipe external surfaces of the asbestos waste disposal bags to remove any dust before it is removed from the asbestos removal work area.
- Remove PPE and double bag, seal with duct tape and mark as 'Asbestos Waste'.
- Remove non-disposable PPE and place in container labelled as containing asbestos.
- Remove disposable RPE and double bag, seal with duct tape and mark as 'Asbestos Waste'.
- Reusable RPE is to be wiped with damp cloth and bag for reuse. Place the damp cloth into a disposable asbestos waste bag.
- Ensure the outside of the bags are decontaminated by using a damp cloth.
- Place the damp cloths into disposable asbestos waste bags.
- Dispose of asbestos waste at the appropriate waste facility.

Regulatory Requirements

The removal and relocation for burial of asbestos contaminated soil in NSW is overseen by various authorities including SafeWork NSW (SafeWork), the NSW Environment Protection Authority (NSW EPA), local government (council) by administering various legislation, regulations and codes of practice. Statutory documents that are applicable to the work include (but are not limited to) the following:



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- NSW Work Place Health & Safety Act 2011.
- NSW Work Place Health & Safety Regulation 2017.
- How to Safely Remove Asbestos Code of Practice issued by the NSW Government in August 2019.
- Exposure Standards for Atmospheric Contaminants in the Occupational Environment [NOHSC1003(1995)].
- NSW Protection of the Environment Operations (General) Regulation 2009: Reg 92.
- NSW Protection of the Environment Operations (Waste) Regulation 2014: 'Sections 77 - 81.

Risk Assessment and Asbestos Classification

Health risk from asbestos containing materials only occurs from airborne asbestos fibres. Whilst asbestos containing materials remain undisturbed and there are no fibres being released from these materials then there is no actual risk posed. Materials which contain loose fibres have a high potential to generate airborne when disturbed.

In accordance with the NSW Work, Health and Safety Regulation 2017, asbestos containing materials are classified as either 'friable' or 'non-friable' materials.

'Friable' asbestos containing materials are any material that contains asbestos and is in the form of a powder or can be crumbled, pulverised or reduced to powder by hand pressure when dry.

'Non-friable' asbestos containing material means any material (other than friable asbestos material) that contains asbestos.

The asbestos cement sheet debris in the fill soil that is present in the area on and surrounding the location of the former chapel building at the St John of God Richmond Hospital at 177 Grose Vale Road, North Richmond NSW is classifiable as non-friable asbestos containing materials and must only to be excavated and relocated for on-site burial by a contractor holding a Class A licence for friable asbestos removal work or a Class B licence for non-friable asbestos removal work.

Contaminated Soil Excavation and Relocation Procedure

The excavation and relocation of the asbestos and / or OCP contaminated fill soil is to be undertaken in accordance with the procedure detailed below.

1. A barricade with asbestos warning signs is to be erected around the contaminated soil removal and burial work areas at the site.
2. A site and project specific safe work method statement and risk assessment for the proposed work including details of the asbestos related precautions to be incorporated into the asbestos removal work as required by section 299 of the Work Health and Safety Regulation 2017 at the site is to be compiled by the asbestos removal contractor undertaking the work.
3. The asbestos removal contractor must compile an asbestos removal control plan as per section 3.5 of the How to Safely Remove Asbestos Code of Practice.
4. A decontamination and change area is to be established at the entry to the excavation and burial work areas.
5. Airborne asbestos fibre monitoring and dust monitoring for OCPs is to be undertaken on the barricades surrounding the excavation and burial areas at all times during the work.
6. Water spray is to be used to control dust generated by the work. Work should not be undertaken during periods of high wind that could carry dust potentially containing asbestos fibres and / or OCP into adjoining areas.
7. The fill soil containing fragments of asbestos cement sheet debris and / or OCP is to be scrapped to remove all of the identified contaminated soil. Scrapping is to be undertaken in layers of 50mm to 70mm until no further asbestos cement sheet debris and / or to the depth of the soil sampling which found the level of OCP to be below the site acceptance criteria of 10mg/kg.
8. The fill soil is to be placed into the burial cells in layers of 150 – 200mm with each layer to be compacted to minimise settlement after the relocation work is completed.
9. At the completion of the placement of the fill soil in the burial cells, the fabric is to be placed over the surface of the fill soil with overlaps of 200mm – 250mm. The fabric is to be pinned in place using steel pegs.
10. The cells are to be capped with soil that was removed from the upper one metre in the cell area.



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11. At the completion of the work the areas from which the fill soil was removed are to be inspected and validation samples collected to verify that the remaining soil is free of asbestos and / or the level of OCP is below the site acceptance level. A validation report is to be compiled detailing the scope of the completed work, the findings of the validation inspection and soil sample analysis results.

If you require any further information, please contact the undersigned on 0437 251 358.

Yours faithfully

P. CLIFTON & ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'P. Clifton'.

Philip Clifton
Principal
BOHS IP402 Certified
SafeWork NSW Licenced Asbestos Assessor