



PO Box 457  
Turrumurra NSW 2074

ABN: 69 041 751 671

PH: 0437 251 358  
Email: [philclifton@pclifton.com](mailto:philclifton@pclifton.com)

6 October 2022

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

**RE: REMOVAL OF ASBESTOS CONTAMINATED DEBRIS IN FILL SOIL  
BEHIND RETAINING WALL AT REAR OF FORMER MONASTERY BUILDING AT ST JOHN  
OF GOD RICHMOND HOSPITAL, 177 GROSE VALE ROAD, NORTH RICHMOND NSW**

Dear Sir,

We refer to our visual inspection undertaken on Monday 19 September 2022 following the discovery of asbestos cement sheet debris within the fill soil that is located behind the brick retaining wall along the southern side of the area where the former Monastery Building was 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).

During soil excavation work to remove the retaining wall, fragments and pieces of asbestos cement sheet debris have been found in the fill soil that is present against the northern side of the retaining wall. See attached photographs.

**Scope of Asbestos Removal Work**

The following scope of work is to be completed to remove the asbestos contaminated fill soil from behind the brick retaining wall located in the southern area of the location of the former Monastery Building.

1. The removal of the fill soil containing asbestos cement sheet debris from behind the brick retaining wall is classified 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 asbestos contaminated fill soil removal work area at the site.
3. A decontamination and change area is to be established at the entry to the non-friable asbestos removal work area.
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 into adjoining areas.
5. The fill soil containing fragments of asbestos cement sheet debris located against the full length of the retaining wall is to be scrapped and removed from the site for disposal at a licenced landfill facility.

6. The fill soil is to be scrapped in layers of 50mm – 70mm with the remaining exposed soil to be inspected at the completion of the scrapping of each layer to ascertain if asbestos cement sheet is present in the remaining fill soil. Where additional asbestos cement sheet debris is found to be present, the excavation of the fill soil is to continue until all asbestos contaminated soil in the excavation area is removed.
7. Where no visible asbestos cement sheet debris is identified, the remaining surface soil within this asbestos contaminated soil removal area is to be raked using a toothed excavator bucket to identify if any further pieces of asbestos cement sheet debris remain. Where isolated pieces are present they may be handpicked from the soil and bagged for disposal as asbestos waste.  
  
Where numerous pieces are identified the soil containing this material is to be excavated and loaded out for landfill disposal as asbestos contaminated waste.
8. At the completion of the work, a visual inspection is to be carried out to verify that the remaining exposed soil within this asbestos contaminated soil excavation area at the site is free of visible asbestos cement sheet debris.
9. Following completion of the visual clearance inspection, a written clearance certification is to be compiled verifying that the asbestos contaminated soil in the area against the retaining wall has been removed and the asbestos removal area may be accessed for the construction work to be undertaken without the use of asbestos PPE.

### **Requirements for Non-Friable Asbestos Removal Work**

The asbestos removal work shall be contained within the location of the retaining wall at the rear of the former Monastery Building 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 from the nominated area of 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 asbestos contaminated soil is located. 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.



Page 3 of 8  
6 October 2022

A change and decontamination area are to be located at the entry to the 'non-friable' asbestos removal work area. All persons entering this asbestos removal work area are to change into asbestos protective equipment in the change area and undergo decontamination prior to leaving the work area. All asbestos PPE is to be removed in the decontamination area when exiting the asbestos removal work area.

The contractor will be liable for all damage caused during the work to construction materials that do not form part of this scope of work. Should any damage occur during the course of the asbestos removal 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 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.

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 asbestos removal 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.



Page 4 of 8

6 October 2022

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 materials, a designated decontamination area is to be established at the entry to the asbestos removal area. All persons entering the asbestos removal area 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 asbestos dust/residue from protective clothing using an asbestos 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.



Page 5 of 8

6 October 2022

- 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.

### **Bagging and Disposal of Asbestos Contaminated Waste**

All asbestos contaminated waste from the work is to be placed into plastic lined bins or trucks for disposal at a landfill facility licenced by the NSW Environment Protection Authority (NSW EPA) to accept non-friable asbestos contaminated waste.

The transport of the asbestos contaminated waste is to be undertaken in covered leak proof trucks or bins and is to be disposed of at a landfill site that can lawfully receive this waste in accordance with the 'Section 42 - Special Requirements Relating to Asbestos Waste' as detailed in the Protection of the Environment Operations (Waste) Regulation 2014.

Small items of asbestos contaminated waste such as used disposable PPE are to be double bagged in 0.2 mm asbestos waste bags for disposal at a landfill facility licenced by the NSW Environment Protection Authority (NSW EPA) to accept non-friable asbestos containing material.

The waste material is to be placed into the first asbestos waste bag at the work face and sealed. This bag is to then be placed into a second waste bag away from the work face (but within the work area). Each bag is to separately 'goose necked' and sealed with tape. The waste material is to be wetted prior to placement in the bag.

The bagged asbestos waste is to be transported to the landfill site in leak proof vehicles or bins which are to be lined with two layers of 0.2 mm plastic. This plastic lining is to be fully tape sealed over the waste to prevent water leakage and dust emissions during transport to the landfill site.

Documentary evidence of the correct disposal of the waste shall be provided. This documentation will include name of authorised tip, weigh bridge docket and registration number of vehicle for every disposal. All waste removed from the site is to be registered with the NSW EPA waste locate app.



Page 6 of 8

6 October 2022

### **Regulatory Requirements**

The removal and disposal of asbestos containing construction materials 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:

- 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 behind the retaining wall at the rear of the former Monastery 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 removed by a contractor holding a Class A licence for friable asbestos removal work or a Class B licence for non-friable asbestos removal work.**

All of the fill soil within this area of the site in which there is asbestos material debris is to be removed from the site for disposal of as special waste – asbestos.

### **Asbestos Removal Procedure**

The removal of the asbestos contaminated fill soil containing asbestos cement material debris is to be undertaken in accordance with the procedure detailed below.

1. A barricade with asbestos warning signs is to be erected around the asbestos contaminated soil removal work area 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 non-friable asbestos removal work area.
5. 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 into adjoining areas.
6. The fill soil containing fragments of asbestos cement sheet debris is to be scrapped to remove all asbestos cement sheet debris. Scrapping is to be undertaken in layers of 50mm to 70mm until no further asbestos cement sheet debris is present.
7. The transport of the asbestos contaminated waste is to be undertaken in plastic lined covered leak proof bins and is to be disposed of at a landfill site that can lawfully receive this waste in accordance with the 'Section 42 - Special Requirements Relating to Asbestos Waste' as detailed in the Protection of the Environment Operations (Waste) Regulation 2014. Documentary evidence of the correct disposal of the waste shall be provided. This documentation will include name of authorised tip, weigh bridge docket and registration number of vehicle for every disposal.
8. After the asbestos contaminated soil has been removed, the remaining soil within the excavated area is to be inspected to confirm that no visible asbestos material is present.



Page 8 of 8  
6 October 2022

9. Following completion of the visual clearance inspection, a written clearance certification is to be compiled verifying that the asbestos contaminated fill soil has been removed and the asbestos removal area may be accessed for the construction work to be undertaken without the use of asbestos PPE.
10. Monitoring for airborne asbestos fibres should be carried out at all times that the non-friable asbestos removal work is being carried out.

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

Yours faithfully

**P. CLIFTON & ASSOCIATES PTY LTD**

Philip Clifton  
Principal  
BOHS IP402 Certified  
SafeWork NSW Licenced Asbestos Assessor

Attachment: Photographs





## PHOTOGRAPHS

6 October 2022



**Asbestos cement sheet debris in fill soil located behind the retaining wall at the rear of the former Monastery Building**



**Brick retaining wall at the rear of the former Monastery Building.  
Fill removed from the area where the wall is exposed and fill soil remaining  
against the wall contains fragments of asbestos cement sheet debris**