

Hazardous Building Materials Management Plan

RMIT Victoria, Australia

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1 INTRODUCTION

RMIT University owns, occupies, and maintains a large and diverse property portfolio throughout Greater Melbourne and Victoria. The properties vary in age, design, and construction material, and their uses include learning and teaching spaces, offices, retail, and storage.

RMIT, as an employer, has various legal obligations under the Occupational Health and Safety Act 2004 (OHS Act), and Environment Protection Act 2017, including the duty to ensure so far as reasonably practicable the health and safety of its workers and others whilst at work, and to prevent the release of substances damaging to the environment.

As part of these legal obligations RMIT has a responsibility to identify and manage hazards and risks across all its properties and facilities. Given the diversity of RMIT's property portfolio, materials presenting negative risks to health, or the environment (Hazardous Materials / HazMat) have been identified, presumed present, or such materials may be identified in the future, for example during building or maintenance works, or scheduled HazMat audits. This being the case, procedures must be implemented to manage risks of potential exposure to RMIT employees, contractors, and others, or environmental damage, from these materials.

This Hazardous Building Materials Management Plan (HBMMP) sets out the identification, maintenance, handling practices and procedures that must be followed to prevent or minimise the risk of exposure to Hazardous Materials related to RMIT's property portfolio to workers, maintenance personnel, contractors, students and visitors, or release to the environment. This HBMMP provides details for what must be done, when, how, and by whom and acts as a reference manual for concerns relating to specified HazMat at RMIT sites.

Throughout this HBMMP are references to other RMIT/PSG procedures, manuals, work instructions etc that should be read in conjunction with this Management Plan. They are represented in ***bold italics*** text. Links to the referenced documents are consolidated in [Section 9 Supporting Documents and Information](#) of this document.

1.1 Objectives

Implementation and adoption of this Hazardous Building Materials Management Plan (HBMMP) is designed to prevent negative health impacts and disease resulting from exposure to Hazardous Building Materials in the workplace and to the environment and to ensure compliance with Occupational Health and Safety and Environmental Legislation.

The Hazardous Materials (HazMat) risk management objectives of RMIT are to:

- Prevent negative health or environmental impacts from HazMat at RMIT, with effective management of risks.
- Ensure, so far as reasonably practicable, all HazMat under RMIT PSG's control is identified, risk assessed, and the details are recorded in the Hazardous Materials Database.
- Ensure identified HazMat, or areas that might contain HazMat, are regularly reinspected / reassessed, and the details are updated in the HazMat Database.
- Ensure all HazMat that might otherwise be disturbed during planned building or maintenance works is identified in advance, and appropriate controls put in place to prevent accidental/uncontrolled disturbance and/or release.
- Provide communication routes, and facilitate communication, between all stakeholders.
- Meet or exceed regulatory requirements.

- Meet or exceed stakeholder expectations.
- Achieve Best Practice in HazMat risk management; and
- Provide a framework to establish, review, and revise HazMat policies and procedures throughout the RMIT property portfolio.

The HBMMP should be read in conjunction with relevant HazMat survey reports, specific Asbestos Management Plans and the RMIT Hazardous Material Database, which includes details of currently identified Hazardous Materials, and should be consulted prior to any building or maintenance works.

1.2 Scope

1.2.1 Setting

The scope of this HBMMP is intended to cover the assets in Australia that RMIT PSG are responsible for operating, maintaining, and enhancing, specifically buildings, fixed plant and associated infrastructure.

The processes and procedures, set out in this HBMMP and related documents, are to be applied to all properties and facilities (Sites) owned or occupied by RMIT staff, students and associates and managed, maintained, improved etc by PSG, at the following campuses:

- City
- Brunswick
- Bundoora East & West
- Dromana
- Hamilton
- Point Cook

The HBMMP, and procedures set out herein, apply to all RMIT employees and any contractor engaged by RMIT who may have need to interfere with the fabric of any building in RMITs property portfolio.

Responsibilities of those who have a role in the safe and sustainable management of Hazardous Building Material at RMIT are described in [Section 3 Roles & Responsibilities](#).

RMIT also leases spaces that RMIT staff, students and associates may occupy. [Section 5.1.3 Leased Spaces](#) includes an explanation of RMITs legislative duties vs the landlords with respect to the management of hazardous materials in these spaces.

RMIT also owns or manages overseas building assets, and the HBMMP is intended to be used as a guideline for these sites.

1.2.2 Specified Hazardous Materials

Based on regular hazardous materials audits conducted across the RMIT property portfolio, current legislation, and available scientific information, the following Hazardous Materials (HazMat) have been identified as potentially presenting a risk to human health or the environment, and under the management or control of RMIT:

- Asbestos Containing Materials (ACMs)
- Lead & Lead-Containing Paints (LCPs)
- Ozone Depleting Substances (ODS) & Synthetic Greenhouse Gases (SGG)
- Polychlorinated Biphenyl's (PCBs)

- Synthetic Mineral Fibre (SMF) products and
- Crystalline Silica.

Given the extent and diversity of RMIT assets, from time-to-time additional hazardous materials may be identified in specific locations (e.g. soil, air or water contamination).

Where identified, such materials and contaminants will be addressed with additional Work Instructions, Safe Work Methods, HazMat Management Plans, inspection/testing/monitoring, etc. as required. Requirements for such additional Controls will be agreed upon by all stakeholders, in consultation with the HazMat Consultant.

1.3 Legislation & Guidelines

The HBMMP processes and procedures have been developed to ensure compliance with relevant legislation and guidelines and Best Practice in management of Hazardous Materials (HazMat).

Current legislative instruments and guidelines for specified HazMat are listed below and should be referred to as necessary prior to the potential disturbance of HazMat.

All HazMat works must be conducted, as a minimum, in accordance with the relevant legislation and guidelines.

It is expected that all RMIT and Property Services staff and Management, all Specialist HazMat Contractors, and all other contractors, are familiar with the legislative instruments applicable to their Roles, including with regards to HazMat, and that all works are conducted accordingly.

1.3.1 Overarching Legislation

The following legislative instruments and guidelines are applicable to multiple Hazardous Materials:

- Victorian Occupational Health and Safety Act (OHS Act) 2004
- Victorian Occupational Health and Safety Regulations 2017 (Victorian Regulations)
- National Model WHS Regulations (2021) (National Regulations)
- WorkSafe Victoria Compliance Code Demolition (2019)
- SafeWork Australia Code of Practice Demolition Work (2016)
- SafeWork Australia Code of Practice Managing risks of hazardous chemicals in the workplace (2021)
- SafeWork Australia Workplace Exposure Standards for Airborne Contaminants (2022)

Australian Dangerous Goods legislation applies to asbestos and other substances that may be harmful to the environment:

- Australian Dangerous Goods (Storage and Handling) Regulations 2022
- Australian Code for the Transport of Dangerous Goods by Road or Rail (2022)

The Environmental Protection Authority (EPA) regulates pollution, waste and contamination from businesses that may be harmful to the environment according to the Environment Protection Act 2017. The transport of hazardous materials on public roads, and their disposal, is set out in:

- Environment Protection (Industrial Waste) Resource Regulations (2009)

1.3.2 Asbestos Legislation

Significant legislative requirements exist for any works involving, or potentially involving, Asbestos or Asbestos Containing Materials (ACMs), including for testing/inspection/sample analysis, and ongoing management of ACMs in-situ.

- Victorian Occupational Health and Safety Regulations 2017, Part 4.4 Asbestos (Victorian Regulations)
- WorkSafe Victoria Compliance Code Managing asbestos in workplaces (2018)
- WorkSafe Victoria Compliance Code Removing asbestos in workplaces (2018)
- National Model WHS Regulations (2021), Chapter 8 Asbestos (National Regulations)
- National Code of Practice How to manage and control asbestos in the workplace (2020)
- National Code of Practice How to safely remove asbestos (2020)
- NOHSC Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition [NOHSC:3003 (2005)].

Asbestos Legislation Summary.

The person who manages or controls the workplace MUST:

- Eliminate so far as reasonably practicable the exposure of persons to airborne asbestos fibres; and
- Identify all asbestos that is under their management or control.

If there is uncertainty whether or not asbestos is present:

- Assume asbestos is present; or
- Arrange for inspection (e.g. Asbestos Audit) and laboratory analysis of samples.

Where Asbestos Containing Materials (ACMs) have been identified or presumed present, specific details of the materials MUST be recorded in an Asbestos Register.

- Location
- Type of Material.
- Is the material Friable or Bonded.
- Condition
- Likelihood of damage or disturbance
- Date of inspection

RMITs Hazardous Building Materials Database incorporates an Asbestos Register

The Asbestos Register MUST be provided to anyone at the workplace who might otherwise accidentally disturb ACMs (e.g. building or maintenance workers).

Identified and presumed ACMs MUST be periodically reinspected, and risk assessed, as a minimum 5-yearly.

The Asbestos Register **MUST** be reviewed and revised as necessary following scheduled inspections / reinspection's, or in response to, for example, accidental disturbance.

Prior to any building or maintenance works that might impact areas or materials that could be or contain ACMs, those areas **MUST** first be assessed.

Typically, a 'Division 6' or 'Pre-Demolition or Major Refurbishment' Asbestos Audit will be required.

Where ACMs are identified or presumed present, a workplace Asbestos Management Plan (AMP) will usually be required.

For the purposes of managing asbestos exposure risks, the AMP should set out what will be done, when, how and by whom.

Where ACMs are being removed or have been disturbed:

- A Licensed Asbestos Contractor will typically be required. RMIT requires all asbestos works to be conducted by a Licensed Contractor.
- A Clearance inspection **MUST** be completed by a competent person (e.g. HazMat Consultant).
- Asbestos air monitoring is a requirement for all ACM removal or disturbance at RMIT.
- Asbestos Work Areas must not be opened for normal use until a Clearance Certificate has been provided (e.g. by the HazMat Consultant).

1.3.3 Lead & Lead Containing Paint (LCP) Legislation

- Victorian Occupational Health and Safety Regulations 2017, Part 4.3 Lead (Victorian Regulations)
- WorkSafe Victoria Compliance Code Lead (2022)
- National Model WHS Regulations (2021), Part 7.2 Lead (National Regulations)
- National Code of Practice for the Control and Safe Use of Lead at Work [NOHSC:2015(1994)]
- AS/NZ Standard 4361.2 – 2017 Guide to Hazardous Paint Management Part 2: Lead paint in residential, public and commercial buildings.

1.3.4 Crystalline Silica Legislation

- Victorian Occupational Health and Safety Regulations 2017, Part 4.5 Crystalline Silica (Victorian Regulations)
- WorkSafe Victoria Compliance Code Managing Exposure to crystalline silica: Engineered stone (2022)
- National Code of Practice Managing the risks of respirable crystalline silica from engineered stone in the workplace (2021)
- Australian Standard 2985:2009 Workplace Atmospheres - Method for sampling and gravimetric determination of respirable dust.

1.3.5 Ozone Depleting Substances (ODS) & Synthetic Greenhouse Gases (SGG)

- Commonwealth Ozone Protection and Synthetic Greenhouse Gas Management Act (1989)
- Ozone Protection and Synthetic Greenhouse Gas Management Amendment Regulation 2012
- Australia and New Zealand Refrigerant Handling Code of Practice (2007)

All works at RMIT sites involving the handling of refrigerant gases **MUST** be conducted by the holder of a current Australian Refrigerant Handling Licence.

1.3.6 Polychlorinated Biphenyl's (PCBs)

- Australian and New Zealand Environment and Conservation Council (ANZECC) Polychlorinated Biphenyls Management Plan (2003)
- EPA Polychlorinated Biphenyls (PCB) Management (IWRG643.2) 2017
- Australian and New Zealand Environment and Conservation Council (ANZECC) Identification of PCB-Containing Capacitors (1997).

1.3.7 Synthetic Mineral Fibre (SMF) Products

- National Standard for Synthetic Mineral Fibres [NOHSC:1004 (1990)]
- National Code of Practice for the Safe Use of Synthetic Mineral Fibres [NOHSC:2006 (1990)].

2 ABBREVIATIONS AND DEFINITIONS

ACD	Asbestos Contaminated Dust or Debris Dust or debris that has settled within a workplace and is (or assumed to be) contaminated with asbestos.
ACM	Asbestos Containing Material A material confirmed as ACM by NATA accredited sample analysis, or visually identified by a competent HazMat Consultant.
Airborne Asbestos	Any fibres of asbestos small enough to be made airborne. For the purposes of monitoring airborne asbestos fibres, only respirable fibres are counted.
CCMS	Contractor Compliance Management Software
CFC	Chlorofluorocarbon
CMS	Contractor Management System
CO²	Carbon Dioxide
Competent person	A person who has acquired, through training, qualification or experience, the knowledge and skills to carry out the task.
EPA	Environment Protection Authority
f/ml	Fibres per millilitre
Friable asbestos	Material that is in a powder form or that can be crumbled, pulverised or reduced to a powder by hand pressure when dry, and contains asbestos.
HazMat	Hazardous Building Material Includes: <ul style="list-style-type: none"> • Asbestos Containing Materials (ACMs) • Lead Containing Paint (LCP) • Refrigerant Gases - Ozone Depleting Substances (ODS) or Synthetic Greenhouse Gas (SGG) • Polychlorinated Biphenyls (PCBs) • Synthetic Mineral Fibre (SMF) materials • Expanded Polystyrene (EPS) • Aluminium Composite Panel (ACP) and • Crystalline Silica
HCFC	Hydrochlorofluorocarbon
HEPA	High Efficiency Particulate Air (filter)
HFC	Hydrofluorocarbon
HBMMP	Hazardous Building Materials Management Plan
HMCP	Hazardous Material Control Plan
HMM	Hazardous Materials Management

HSE	Health, Safety & Environment
IWRG	Industrial Waste Resource Guidelines
LCP	Lead Containing Paint (>0.1% lead)
mg/m3	Milligrams per cubic metre
NATA	National Association of Testing Authorities
NATA accredited laboratory	Means a testing laboratory accredited by the National Association of Testing Authorities (NATA), Australia, or recognised by NATA solely or with someone else.
NOHSC	National Occupational Health & Safety Commission
Non-friable asbestos	Material containing asbestos that is not friable asbestos, including material containing asbestos fibres reinforced with a bonding compound.
ODS	Ozone Depleting Substance
OHS	Occupational Health & Safety
PCBs	Polychlorinated Biphenyls
PM	Project Manager
PPE	Personal Protective Equipment
PSG	Property Services Group (RMIT)
PTW	Permit to Work
Respirable asbestos	Means an asbestos fibre that: <ul style="list-style-type: none"> • Is less than 3 microns (µm) wide; • Is more than 5 microns (µm) long; • Has a length to width ration of more than 3:1.
Respirable silica	Particles of crystalline silica that are small enough to be inhaled deep into the lungs.
SN	SafetyNow
SFARP	So far as Reasonably Practicable
SGG	Synthetic Greenhouse Gas
SMF	Synthetic Mineral Fibre
SWMS	Safe Work Method Statement
TWA	Time Weighted Average
WHS	Workplace Health & Safety

3 ROLES & RESPONSIBILITIES

For the purposes of HazMat Risk Management, and administration of the HBMMP, it is necessary to assign Roles & Responsibilities (Roles), internally and externally.

In case of Emergency, and in accordance with [Section 7 Emergency Procedures](#), the RMIT Representative and HSE Manager must be notified. The RMIT Property Services Representative and HSE Manager will typically engage the HazMat Consultant to conduct further assessment, including testing and monitoring, and then, if required, engage a HazMat Removals Contractor.

3.1 Internal Roles - Property Services

3.1.1 Executive Director – Property Services

- Aim to eliminate the risk of exposure of persons at the workplace to Hazardous Building Materials including airborne asbestos fibres by ensuring Hazardous Building Materials are removed from RMIT's property portfolio whenever practicable. If it is not reasonably practicable to eliminate the Hazard Building Materials, ensure measures are in place to reduce the exposure so far as is reasonably practicable.
- Ensure adequate resources are in place for the management and control of risks associated with the presence of Asbestos and other Hazardous Building Materials in RMIT's property portfolio.
- Provide Executive endorsement of the HBMMP.

3.1.2 Associate Director – Reporting & Compliance – Property Services

- Provide Secondary (Director) endorsement of the HBMMP.
- Endorse Permit Approvers list within the PTW Procedure.
- Overall coordination of RMIT staff and contractors to comply with the HBMMP requirements.

3.1.3 HSE Manager/s – Property Services

- Design, implement and maintain a system for the management and control of risks associated with the presence of Asbestos and other Hazardous Building Material in RMIT's property portfolio.
- Consult with employees (including independent contractors and employees of independent contractors) when identifying or assessing hazards or risks to health or safety at the workplace (including the risk of exposure to Hazardous Building Material).
- Regularly review the HBMMP and related documents in accordance with [Section 4.1 HBMMP Review & Revision](#).
- Ensure Hazardous Building Material Database remains current and accurate.
- Arrange Hazardous Material Audits of all building assets, where HazMat is or may be present, in accordance with legislated requirements for Asbestos Containing Materials (ACMs) to be periodically reinspected and risk assessed at least every 5 years.
- Conduct periodic audits of hazmat related works, including staff and contractor compliance with the HBMMP.
- Develop and maintain Hazardous Building Material Management training and induction content.

- Provide HazMat inductions and PTW training to RMIT staff and contractors. Ensure induction records for RMIT staff are provided to PSG Quality and Compliance for retention and induction records for contractors are maintained in the online Contractor Management Platform.
- Manage overall operational function, including Budget, of [RMIT specialist HazMat contractors](#) appointed to the RMIT HazMat Panel.
- Provide technical (HazMat) expertise, within RMIT and to non-specialist contractors and stakeholders.
- Liaise with specialist HazMat contractors as necessary, and for the purposes of the HBMMP.
- Conduct technical review and approval of Property Services HazMat PTW.
- Manage the Permit Approvers list within the PTW procedure.

3.1.4 Advisor Sustainable Systems – Property Services

- Regularly review the environmental aspects of the HBMMP and related documents in accordance with [Section 4.1 HBMMP Review & Revision](#), with particular focus on the incorporated Environmental Aspects.

3.1.5 Senior Manager Quality and Compliance – Property Services

- Oversee PSG staff training requirements.
- Administer the PSG staff training schedule.
- Maintain PSG staff training record and registers.

3.1.6 Compliance Officer – Property Services

- Administer the Permit to Work System.
- Administer contractor registration and compliance via the Contractor Compliance Management Software.
- Administer access to RMIT HazMat Database.
- Undertake a review of the HazMat Database annually to confirm it is current, accurate and associated reports and records (eg. Audit Reports, Clearance Certificates, Site Plans etc) have been uploaded. Collaborate with consultants to update Database as required.
- Assist HSE Managers to coordinate Specialist Contractors to undertake the safe management of hazardous materials in accordance with OHS Regulations and RMIT Procedures.
- Assist HSE Manager to coordinate Specialist Contractors to conduct monthly air monitoring and quarterly visual inspections as required.
- Assist HSE Manager to coordinate Specialist Contractors to conduct Division 5 audits for RMIT buildings.

3.1.7 RMIT Property Services Representative

RMIT Property Services Representative is the person within Property Services who is requesting the works. This may be a Project Manager, Project Officer, Facilities Manager, or other.

- Plan works in accordance with Gateway Process and [PS-1001 HBMM – RMIT Managed Works](#).
- Review the Hazardous Materials Database in the project planning stage, to identify potential project impacts and costs, and define a HazMat Scope of Works as necessary (e.g. removal or making-safe of HazMat in advance). Allow sufficient budget and timeline to manage hazmat in accordance with this HBMM.
- Ensure RMIT staff and contractors under your supervision are made aware of the HBMM and associated documents and processes, provided with access to the Hazardous Materials Database, and have undertaken all required inductions including HazMat Awareness and PTW training and comply with the respective requirements.
- Understand the limitations of the Hazardous Materials Database, in particular, with regards to Inaccessible Areas.
- Where HazMat works are conducted, ensure the contractor engages a HazMat Consultant/Hygienist independent (as is legally required) of the HazMat removal contractor.
- Review and approve Hazardous Material Control Plan (HMCP) or SWMS developed by Contractor or HazMat Removalist. Consult with the HSE Manager, Advisor Sustainable Systems, HSRs and independent Hygienist/Hazardous Materials Consultant as necessary.

3.1.8 Property Services PTW Approvers

HazMat PTW Approvers typically occupy other HBMM Roles, including Facilities Manager, and HSE Manager - PS. PTW Approvers are to be consulted to assist with coordination of site works and minimising their impacts. [Section 4.4](#) provides details about PSGs Permit to Work System

- Conduct technical review and approval of Permit to Work (PTW) applications.
 - HSE Manager/s are required to conduct technical review and approval of works that may result in asbestos disturbance or lead risk work.
 - Facilities Manager can conduct coordination review and approval of other HazMat PTW and any works in Building 201.

3.1.9 Property Services Property Manager Real Estate Services

- Request the Hazardous Materials Register from landlord for any building leased by RMIT that was constructed before 2003.
- Provide this information to HSE Managers Property Services to review and add to the RMIT Hazardous Building Material Database.
- Any works undertaken by landlord to remove ACMs should be shared with HSE Managers PS so database can be updated accordingly.
- Any works undertaken by RMIT to remove ACMs shall be added to the Register and shared back with the building owner, for their records.

3.2 Internal Roles / Stakeholders – other business units

A number of other internal stakeholders are, or are likely to be, engaged in relation to HazMat administration and site works.

3.2.1 Health, Safety & Wellbeing

- Develop, implement and maintain an enterprise Hazardous Material Management Process that outlines when and where a Hazardous Material Management Plan is required.
- Senior Health, Safety & Wellbeing (HSW) Advisors to communicate with, and facilitate communication between, Property Services, School Department Representatives, RMIT Staff, and other stakeholders as necessary, regarding health and safety issues and concerns, including Hazardous Building Materials.

3.2.2 Procurement

- Manage the relationship with HazMat Panel (Specialist) Contractors, including maintaining current insurances and licensing records. Any issues must be brought to the attention of the Property Services HSE Manager/s.

3.2.3 Health & Safety Representatives (HSRs)

Health and safety representatives (HSRs) are staff who are elected to represent the health and safety interests of workers in their designated work group. They are required to:

- Conduct the HSR role in accordance with the Occupational Health & Safety Act 2004.
- Represent members of the DWG concerning health or safety
- Monitor measures taken by RMIT/PSG and RMIT/PSG Management in compliance with the OHS Act and OHS Regulations. Participate in consultation and issue resolution.

3.2.4 Security

- Provide access for HazMat Contractors to site, as directed by the RMIT PS Representative.
- Has authority to turn contractors away from site, if the correct PTW paperwork is not available (in particular B201 specific HazMat PTW) or contractor onboarding requirements have not been met.

3.2.5 Employees and School / Department / Management Representatives

- Complete all necessary RMIT inductions, including Hazardous Materials inductions and training.
- Consult with RMIT Health, Safety & Wellbeing staff, Property Services, and others as necessary regarding all health, safety, and environmental matters and before disturbing any building materials or assets.
- Take reasonable care for their own health and safety and that of others who could be affected by their acts or omissions in the workplace.

3.3 Capital Works and Facility Maintenance Contractors

3.3.1 General Contractor and Subcontractors Workers

- Complete all necessary RMIT inductions, including Hazardous Materials inductions and training.
- Conduct works in accordance with RMIT Contractor Safety Management System and [PS-8259 Property Services Contractor Booklet](#).

- Conduct works in accordance with this HBMMP, including reviewing the RMIT Hazardous (Building) Materials Database prior to any site works.
- Identify all Hazardous (Building) Materials or inaccessible areas that might contain Hazardous Materials, that might otherwise be disturbed during site works, prior to works commencing.
- Engage an RMIT Panel HazMat Consultant, if there are any doubts whether or not Hazardous Materials may be impacted by proposed works (e.g. inaccessible building voids or materials), who will, where necessary, conduct a site assessment (typically a 'Division 6 – HazMat Audit').
- In consultation with the RMIT Project Representative and HazMat Consultant, ensure any HazMat that might be disturbed by planned works is removed in advance under controlled conditions.
- Where required, ensure an approved HazMat Permit to Work (PTW) is in place prior to works commencing.
- Ensure Hazardous Materials are removed by appropriately licensed contractors, pre-approved and appointed to the RMIT Specialist HazMat Contractor Panel (e.g. Licensed Asbestos Removalist).
- Engage an RMIT Panel HazMat Consultant independently of the Licensed Asbestos Removalist.
- Following HazMat removal works, and prior to any other works or reoccupation in the affected areas, ensure appropriate certification is obtained and confirmation is received from the HazMat Consultant that areas are safe to be re-occupied. Typically, this will be issued as a '**Clearance Certificate**'.
- If suspect Hazardous Materials are identified at any time during the course of works, the Contractor must immediately make-safe, cease works, and inform the RMIT Project Representative. Refer [Section 7 Emergency Procedures](#)

3.3.2 Principal Contractor

Where a Contractor is appointed as Principal Contractor, in accordance with Victorian & National OHS Regulations, and notwithstanding the Roles set out above, the Principal Contractor is responsible for:

- Management and control of the works and/or workspaces that are assigned to them, including OHS and Hazardous Materials management in accordance with Work Instruction [PS-1002 HBMM – Contractor Managed Works](#).
- Preparation of a health & safety coordination plan, including management of Hazardous Materials, in accordance with this HBMMP.
- Appointment and management of required Specialist HazMat Contractors, Including Licensed Removalist and HazMat Consultant/Hygienist
- Ensuring RMITs HazMat database has been updated by the HazMat Consultant to reflect the work carried out and is representative of new floor plans where applicable.
- Providing evidence to RMIT Project Representative that HazMat Database has been updated.

3.3.3 Head Contractor

Where a Contractor is appointed as Head Contractor, the Head Contractor is responsible for:

- Management and control of the works and/or workspaces that are assigned to them, including OHS and Hazardous Materials management in accordance with Work Instruction [PS-1002 HBMM – Contractor Managed Works](#).

Depending on contract arrangement, the Head Contractor may also be responsible for:

- Appointment and management of required Specialist HazMat Contractors, Including Licensed Removalist and HazMat Consultant/Hygienist
- Preparation of a health & safety coordination plan, including management of Hazardous Materials, in accordance with this HBMMP.
- Ensuring RMITs HazMat database has been updated by the HazMat Consultant to reflect the work carried out and is representative of new floor plans where applicable.
- Providing evidence to RMIT Project Representative that HazMat Database has been updated.

3.3.4 Contractor Manager / Superintendent

The Contractor Manager / Superintendent is responsible for:

- Overall administration of the contract
- Ensuring all employees and subcontractors conduct their works in accordance with the requirements of this HBMMP.

3.4 Specialist HazMat Contractors

3.4.1 HazMat Consultants (previously referred to as Hygienist or Occupational Hygienist)

- Conduct works as a minimum, in accordance with relevant Legislation and Guidelines.
- Conduct HazMat audits of RMIT building assets as directed.
- Undertake independent air monitoring or testing during and/or on completion of works that may disturb certain HazMat (e.g. ACMs, LCP or Crystalline Silica).
- Provide a Clearance Certificate or otherwise suitable report confirming the areas are safe for normal occupation, following removal of any ACMs or higher risk HazMat.
- Update the RMIT Hazardous Materials Database with findings from HazMat Audits / Inspections / Assessments they have conducted.
- Arrange/Coordinate testing of suspect HazMat, and ensuring analysis is conducted by an appropriately NATA accredited laboratory.
- Conduct air testing for specific Hazardous Materials, including, but not limited to, Asbestos, Lead & Respirable Silica.

3.4.2 Licensed Asbestos Removalist

- Plan, agree a scope, and conduct works, in consultation with the RMIT Project Representative and/or Principal/Head Contractor (and others as necessary) and in accordance with 'Division 7 – Removal of asbestos' in 'Part 4.4 – Asbestos' of the OHS Regulations. It is also likely that the HazMat Consultant will need to be consulted in the planning stage.
- Schedule removal of Asbestos & ACMs, as directed by the RMIT Project Representative and/or Principal/Head Contractor.
- Maintain a copy of the Asbestos (or HazMat) Control Plan or SWMS for the duration of the HazMat removal work.
- Where removal works require a licence, submit a Notification to WorkSafe at least 5 days in advance. Exemptions apply for 'Emergency' works.

- Provide emergency response, to remove ACMs or 'make-safe' areas where ACMs have been disturbed.
- Remove or 'make-safe' of non-asbestos HazMat, where the Licensed Asbestos Removalist is competent to conduct those works.
- Remove Asbestos Waste from site, using an appropriately licensed vehicle.
- Dispose of Asbestos Waste, at an appropriately licensed disposal site.

3.4.3 Other Specialist / HazMat Contractors

From time-to-time it may be necessary to engage additional Specialist HazMat Contractors or Consultants if additional expertise or licensing requirements are identified in relation to HazMat.

The need for additional Specialist HazMat Contractors, and their Roles, will be determined in consultation with the RMIT Project Representative, Principal/Head Contractor, HSE Manager, and others as necessary.

3.5 Regulatory Authorities

Regulatory Authorities may request access to the workplace, including workplace health and safety related documents, at any time.

3.5.1 WorkSafe Victoria

WorkSafe Victoria (WorkSafe) is the State Government Authority administering, monitoring, and enforcing Occupational Health & Safety (OHS) Legislation, including in relation to Hazardous Materials.

- WorkSafe is the authority responsible for licensing of Asbestos Removalists.

In many cases there are requirements to submit notifications to WorkSafe regarding Hazardous Materials, in particular with regards to any licensed asbestos works, or if 'Lead Risk Work' is identified:

- Notifications of Asbestos Removal must be provided (by the Licensed Asbestos Removalist) at least 5 days before scheduled removal works.
- WorkSafe must be notified if airborne (asbestos) fibre levels outside of an Asbestos Work Area are equal to or greater than 0.05 f/ml.
- WorkSafe must be notified within 7 days if Lead Risk Work is identified.

3.5.2 EPA Victoria

The Environment Protection Authority (EPA) Victoria is the State Government Authority administering, monitoring, and enforcing Environmental Protection Legislation, including in relation to Hazardous Materials.

The EPA is responsible for regulation of emissions into the air, soil or water from the workplace or workplace activities, and for the transport of hazardous materials on public roads and their disposal.

The EPA is responsible for issuing licences:

- For vehicles carrying prescribed HazMat, including vehicles transporting Asbestos, Lead or PCB waste.
- For disposal or processing sites of prescribed HazMat and Hazardous Waste.

4 HAZARDOUS BUILDING MATERIAL MANAGEMENT PLAN ESSENTIALS

4.1 HBMMP Review and Revision

This HBMMP will be regularly reviewed, and revised where necessary, to ensure continuing compliance with current Legislation and Guidelines, and Best Practice management of HazMat in accordance with current scientific knowledge and industry standards.

It is the responsibility of the PS HSE Manager – Governance and Systems to arrange for HBMMP review.

The HBMMP may be reviewed internally (e.g. by the HSE Manager, Snr Manager Sustainability or Sustainable Systems Advisor), or external Specialist Contractors may be engaged, such as the HazMat Consultant, to assist.

The HBMMP will be reviewed:

- As a minimum, and in accordance with Asbestos legislative requirements, 5 yearly.
- On request by a relevant internal or external Authority (e.g. Hazardous Materials Officer, HSE Manager, WorkSafe, EPA).
- If there is evidence to suggest current HazMat policies or procedures may not be sufficient to manage associated Risk or achieve the HBMMP Objectives, for example in response to a HazMat related Incident or Non-Conformity.
- If there are changes to HBMMP related internal policies and procedures.
- In response to changes in Legislation or Standards.

The HBMMP review process will include, but will not be limited to:

- Review of representative HazMat related site works conducted since the previous review.
- Review of all HazMat related Incidents and Non-Conformities raised since the previous review.
- Review of currency for Legislation and Guidelines referenced in the HBMMP.

4.2 Hazardous Materials Database

The Hazardous Materials Database is a vital cornerstone of the HBMMP and risk management objectives.

Details of identified or suspected HazMat associated with RMIT assets for each site are maintained in the Hazardous Materials Database.

All identified Hazardous Materials must be recorded in the RMIT Hazardous Materials Database, with locations and risk assessments.

Supporting documentation, such as Audit Reports, Marked Site Plans, Photographs and Clearance Certificates, must also be uploaded to the HazMat Database.

Where HazMat audits have been conducted by the HazMat Consultant, the HazMat Consultant is responsible for uploading all relevant data and supporting documents and updating the register accordingly.

[PS-1005 Hazardous Building Materials Database Work Instruction](#) sets out in detail what information must be recorded, how, and when, including supporting photographs and applicable documents (e.g. HazMat Audit reports, Clearance Certificates). Recording and administration of the HazMat Database information and supporting documents must be in accordance with this work instruction.

Staff and Contractors needing view only access to the database will find all the information they need in [PS-1029 Quick Reference - Standard User - Hazmat Database](#).

4.2.1 Accessing the Hazardous (Building) Materials Database

Request for access to the RMIT Hazardous Materials Database should be sent to: psgpermits@rmit.edu.au as per [PS-1005 Hazardous Building Materials Database Work Instruction](#).

RMIT employees must have completed the HazMat Induction before access will be granted. Contractors should get written endorsement from their RMIT representative, and forward this onto to psgpermits@rmit.edu.au along with details of the project duration to request access.

4.2.2 Database Quality Assurance

In addition to the documented procedures for data collection and management set out in [PS-1005 Hazardous Building Materials Database Work Instruction](#):

- The Database will be subject to a basic review of quality and completeness Annually.

Basic reviews of the database should include:

- A review of general data quality
 - Are risk assessments filled.
 - Are there duplicate entries.
 - Hazmat items have photographs. Correctly numbered and linked to an image. are they correctly numbered.
 - Are there Clearance Certificates linked to green ACM entries (asbestos has been removed).
- Checking the Building Documents folder contains the latest 5-year HazMat Audit Report.
- Identifying buildings due for a scheduled 5-year HazMat Audit, in the following 12 months.

4.3 Specialist Hazardous Materials Contractor Panel

RMIT maintains a panel of approved specialist contractors for HazMat works, typically HazMat Consultants (previously referred to as hygienists) and Licensed Asbestos Removalists, refer [APPENDIX B: Property Services Approved Suppliers - Specialist HazMat Contractors](#).

Specialist HazMat Contractors are expected to be familiar with the legislative instruments applicable to their roles, including with regards to HazMat, and that all works are conducted accordingly.

All Specialist HazMat Contractors and individuals conducting works at RMIT sites must be appropriately licensed and experienced (competent) for the tasks being undertaken.

Specialist HazMat Contractors must also conduct all works in accordance with the Master Consultancy Agreement and [PS-8259 Property Services Contractor Booklet](#).

Maintaining this contractor panel assists with ensuring specialist contractors are suitably competent, experienced and licensed to provide these services.

In extenuating circumstances, such as unforeseen or untypical HazMat types or situations, it may be necessary to engage specialist contractors/consultants who are not on the RMIT HazMat Consultancy Panel. The HSE Manager will liaise with the RMIT Project Representative and others as necessary (e.g. Procurement) to determine requirements for these contractors and nature of engagement.

4.3.1 Engagement of Specialist Contractors

Specialist Hazmat Contractors may be appointed to work on RMIT premises in two ways: directly by RMIT, or via a Principal or Head Contractor appointed by RMIT. The responsibilities assigned to each of these processes is outlined in the Property Service Operating Procedures: [PS-1001 Hazardous Building Materials Management \(HBBM\) - RMIT Managed Works](#) and [PS-1002 HBBM – Contractor Managed Works](#).

4.4 Permit to Work (PTW)

PSG operates a Permit to Work system for managing/monitoring certain high-risk activities, in accordance with [PS-8259 Property Services Contractor Booklet](#).

The Permit to Work Process is set out in [PS-1006 PSG Permit to Work Process](#). This procedure should be read and understood by both applicants and approvers of a PTW request.

Any work at RMIT that has the potential to disturb higher-risk HazMat (typically ACMs or LCPs) in any RMIT building requires a HazMat Permit and Section 6 of the Permit to Work Form must be completed.

Buildings 201, and Building 10,12,14 risers/bulkheads contain potentially higher risk ACMs, in multiple areas, and therefore a specific Permit is required and Section 5 of the Permit to Work form will need to be completed, regardless of the potential to disturb HazMat.

The Hazardous Building Material Management Process Flow, shown at [Section 6.5.1](#), shows when a PTW may be required.

In the first instance potential HazMat in the proposed works areas, and the need for a HazMat PTW, will be identified at the kick-off meeting and project planning stage, including review of the HazMat Database.

It is typically an RMIT requirement that, prior to any works that have the potential to disturb HazMat, a 'Division 6' or 'Pre-Demolition or Major Refurbishment' HazMat audit is conducted. The results of these audits will inform the need and scope for a HazMat PTW.

Works must not commence until the PSG Permit Office has issued an approved Permit to Work.

5 GENERAL PRINCIPLES OF HAZARDOUS BUILDING MATERIAL MANAGEMENT

The general principles of Hazardous Building Materials Management for the RMIT property portfolio are broadly covered by four separate steps. These are:

1. Identification of HazMat including asbestos in the workplace
2. Evaluation of the situation with regard to the type of HazMat, its condition, its location in relation to people, the activities that take place in the area and the risk of the fibres, particle or contaminants becoming airborne.
3. Selection, implementation and communication of risk controls and
4. On-going monitoring and re-assessment.

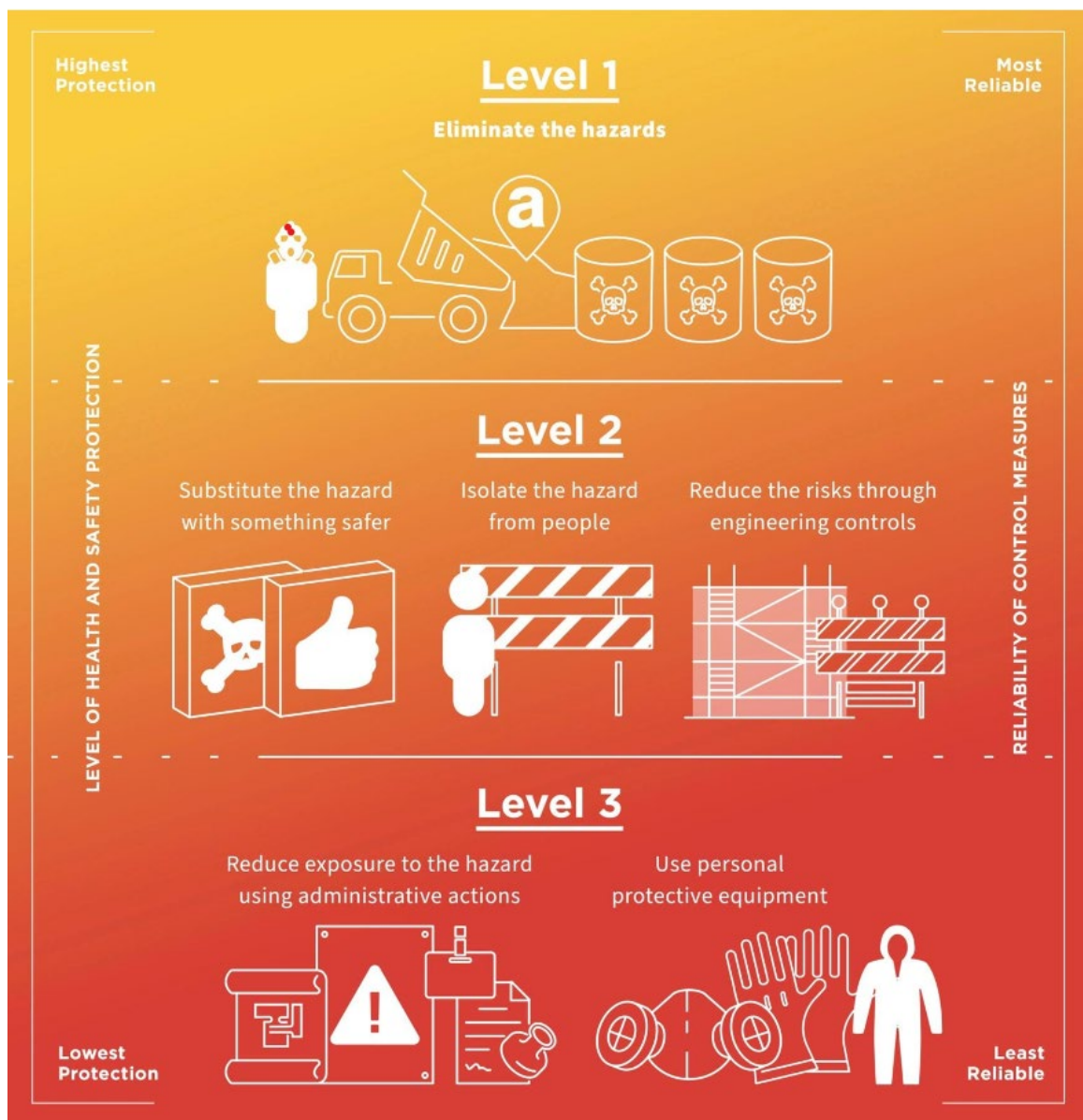
The following hierarchy of controls must be considered when managing HazMat hazards:

- Eliminating the risk for example, removing the HazMat. Removal of ACM and other Hazardous Building Materials should be considered as part of planned building or maintenance works, where practical.

- Where possible substituting a less hazardous material for the HazMat, for example non-asbestos containing cement sheeting, rockwool or fibreglass batts for insulation.
- Applying engineering controls for example, enclosing, encapsulation or sealing in situ ACM.
- Using administrative controls for example, Asbestos Registers, Standard Operating Procedures, Permits to Work, Labelling, training and communication, environmental monitoring, sampling and health surveillance.
- Using Personal Protective Equipment.

A combination of these controls may be required to adequately manage, and control risks associated with HazMat including asbestos or ACM.

Hierarchy of Risk Control Infographic



Infographic Source: Victorian Asbestos Eradication Agency

5.1 Identifying Hazardous Building Material

5.1.1 HazMat Audits & Inspections

RMIT undertakes to conduct Hazardous Materials Audits of all building assets, where HazMat is or may be present, at least every 5 years. This is in accordance with legislated requirements for Asbestos Containing Materials (ACMs) to be periodically reinspected and risk assessed at least every 5 years.

The audits involve visual assessment of the condition of the HazMat, particularly ACM to determine whether the HazMat is in a satisfactory condition, or if deterioration has occurred since the previous audit. The audits will determine if any remedial action, such as encapsulation, isolation or removal of the ACM is required.

It is the responsibility of the HSE Manager, together with the Compliance Officer, to arrange for scheduled HazMat Audits of building assets.

The method for the selection of buildings to be audited is described in [PS-1005 Hazardous Building Materials Database Work Instruction](#).

NB

5 yearly HazMat Audits are not required for assets or items that have previously been confirmed as not containing Asbestos or LCP.

In the case of more modern buildings, where no ACMs or LCP have been identified or presumed present, and with prior consultation between PSG and the HazMat Consultant, longer inspection intervals may be deemed sufficient (e.g. 10 years **TBC**).

HazMat Audits/Identification and Risk Assessment must be conducted by appropriately licensed and experienced HazMat Consultants / Hygienists appointed from the RMIT HazMat Contractor Panel.

The Audits are used to update RMIT's [Hazardous Materials Database](#).

The Database must be updated each time an audit is undertaken, when work takes place to remove or otherwise treat HazMat or when additional information becomes available from analysis of the material.

During Audits or non-routine inspections, when materials suspected of containing asbestos are identified, sampling and analysis will need to be performed. Sampling and analysis will include material previously identified as ACM that has deteriorated.

5.1.2 Inaccessible Areas

Areas which cannot be accessed during normal building operations or without substantial damage to a building's fabric may be deemed to be 'inaccessible'. All inaccessible areas are to be identified and assessed by the competent person (HazMat Consultant/Hygienist) conducting the site inspection. Any inaccessible areas that are suspected to contain HazMat are to be recorded in the Hazmat Register, as outlined in [PS-1005 Hazardous Building Materials Database Work Instruction](#).

These areas are to be managed as containing asbestos or HazMat as documented, until its absence can be verified.

Examples of areas that may be deemed inaccessible during routine inspections, include:

- Inaccessible ceiling spaces e.g. those that cannot be accessed by the means of a manhole or inspection hatch.
- Beneath carpet or multiple layers of floor coverings.
- Wall cavities, risers, within service shafts, ducts etc., concealed within the building structure.
- Exposed soils surrounding the building structures of the site, or underneath the concrete slab of all building structures at the site.

- Height restricted areas above 2.7m or any area deemed inaccessible without the use of specialised access equipment.
- Internal areas of plant, equipment, air-conditioning ducts and re-heat units and within those areas accessible only by dismantling equipment.
- Energised services, gas, electrical, pressurised vessel and chemical lines.

Where a HazMat Consultant has been engaged to conduct an intrusive onsite assessment of a building/area, any inaccessible areas should be brought to the attention of the RMIT Project Manager ASAP and before site works conclude. Arrangements may need to be made to safely facilitate a full inspection.

5.1.3 Leased Spaces

Where a space is leased for use by RMIT, the legislated responsibility for identifying Asbestos Containing Materials (ACMs), and documenting an Asbestos Register, may differ depending on the details of the lease agreement, and who has assigned responsibility (or ownership) for the servicing and maintenance of plant and equipment.

Typically, the landlord would be responsible for obtaining and providing an Asbestos Register prior to leasing the space.

When properties are first leased by RMIT, a copy of the current Asbestos Register (less than 5 years old) should be sought from the Landlord, and the details entered into the RMIT HazMat Database.

If the Landlord does not have an Asbestos Register, less than 5 years old, arrangements will be made by RMIT to conduct a Hazardous Materials audit prior to occupation. Refer also [Section 1.3.2 Asbestos Legislation](#).

5.2 Evaluation of Suspected Hazardous Building Materials

In many cases, it will be necessary to take samples of materials or substances, or conduct on-site testing (e.g. swab testing for Lead Content in paint), to confirm HazMat type and assist with risk assessments.

All HazMat sampling must be undertaken by appropriately competent (trained, licensed, and experienced) individuals and organisations.

RMIT maintains a panel of [approved Specialist HazMat Contractors](#), including HazMat Consultants, who must be used for all HazMat sampling, inspection & consultancy in the first instance.

All HazMat samples submitted for laboratory analysis must be analysed by a laboratory with NATA (National Association of Testing Authorities) accreditation for the methods used, with results provided as a NATA accredited 'Analysis Certificate'.

Additional testing may be required from time to time, for example:

- Building material samples (non-asbestos)
- Water/Soil/Air samples, to conduct a broad screen analysis and identify potential substances or contaminants of concern and
- Water/soil/air samples, to provide ongoing measurement or monitoring for specific substances or contaminants of concern.

5.2.1 Air Monitoring

Air Monitoring may be conducted in relation to a number of hazardous materials, including asbestos, silica, SMF and lead.

Results of all Air Monitoring MUST be provided as a NATA (National Association of Testing Authorities) accredited 'Analysis Certificate'.

Many air monitoring requirements at RMIT are in relation to ACMs (asbestos air monitoring), and there are strict legislative requirements for conducting the monitoring, analysing the samples ('fibre counts'), and reporting the results.

RMIT requires that asbestos air monitoring is conducted for any planned removal or accidental disturbance of ACMs.

Air monitoring procedures for specific HazMat are provided in [Section 8 HazMat Specific Procedures](#).

Air monitoring requirements for non-asbestos materials will be assessed on a case-by-case basis, based on a range of factors including type and quantities of materials, location, legislative requirements and internal RMIT requirements and considerations.

The HazMat Consultant will be consulted to determine air monitoring requirements for non-asbestos air monitoring.

5.2.2 Assessing the risk

Risk Assessment Methodology is detailed in [PS-1005 Hazardous Building Materials Database Work Instruction](#).

Outcomes from the risk assessments conducted by HazMat Consultants are captured in the Hazardous Materials Database.

6 HAZARDOUS BUILDING MATERIAL RISK CONTROLS

The control of risk associated with Hazardous Materials will use the most appropriate method applicable to the circumstance and will take into consideration the condition of the HazMat, its potential to suffer damage or mechanically degrade, and the likelihood of exposing people to airborne fibres, particles or dust etc. The hierarchy of controls referred to in [Section 5](#) will be used to determine the control methods for the circumstances.

6.1 Removal

In accordance with the 'Hierarchy of Controls' for managing all hazards and associated risks, it is RMIT's preference to remove HazMat (and therefore the ongoing associated risks) whenever practical.

Where practical, removal of HazMat during planned building or maintenance works, should be considered.

Where demolition or refurbishment works are to occur, and this work is likely to impact on ACM, the ACM must be removed under controlled conditions prior to the commencement of any site works.

Removal of HazMat. Particularly Asbestos, Lead Containing Paint and Silica Containing Products, must be performed under controlled conditions by licenced and trained personnel, who are licensed Removal Contractors. [Refer to Section 8 for HazMat Specific Procedures](#)

If it is not reasonably practicable to remove the HazMat, then other control measures must be implemented to ensure occupants of the buildings and contractors are not exposed to HazMat.

6.2 Enclosure

Where it is not considered reasonably practicable to remove the HazMat, the preferred alternative control measure is enclosure. This is an interim control measure and should be supported through regular inspections by a competent person to identify if the HazMat requires removal due to damage or deterioration.

Enclosure involves installing a barrier between the HazMat (typically Asbestos) and adjacent areas which will reduce the risk of further mechanical damage to the material. Examples of this at RMIT are bulkheads and internal risers constructed to enclose friable products such as pipe lagging.

Consideration must be given when designing the enclosure for the need to provide access to the ACM for regular inspection of its condition and access to other building services.

6.3 Encapsulation or Sealing

If the HazMat cannot be removed or enclosed, encapsulation or sealing is the next appropriate control measure.

Encapsulation refers to the coating of the outer surface of the HazMat (typically ACM or LCP) by the application of a sealant compound that usually penetrates to the substrate, hardens the material and provides a protective coating impermeable to asbestos fibres.

Encapsulation or sealing helps protect the HazMat from mechanical damage and is designed to reduce the risk of exposure by inhibiting the release of fibres or respirable particles into the airborne environment.

Encapsulation or sealing is not considered to be an acceptable alternative to repairing or removing severely damaged ACM. It is important to select coating that is appropriate to the material to be sealed and has the required fire resistance, thermal insulation and ultraviolet (UV) properties necessary for it to be an effective control.

6.4 Managing In-Situ HazMat

The identification of HazMat in a building does not automatically necessitate its removal. HazMat in a stable condition and not prone to mechanical damage can generally remain in situ.

ACM that remains in situ must be [inspected](#) on a regular basis, to ensure its integrity is maintained, it should be [labelled](#) with an appropriate warning, and must be removed under controlled conditions prior to demolition or refurbishment works that may disturb the asbestos.

The ongoing management of in situ ACM is important to ensure the material is not damaged or does not deteriorate to such an extent that staff, students or visitors are exposed to airborne asbestos fibres.



6.4.1 Labelling

So far as safely and reasonably practicable (SFARP), in accordance with current legislation, all identified asbestos containing materials (ACMs) will be visually indicated on site with material labels.

Labelling of HazMat at RMIT must be in accordance with Work Instruction [PS-1020 HBMM – Labelling](#).

Material labelling is an additional risk management procedure and should not be relied upon for identification of ACMs on site. Labels may have fallen off, been covered/painted, or materials may not have been previously identified or labelled.

RMIT has developed specific labels to be applied directly to ACMs and signage for buildings where ACMs are present or suspected, as shown below.

Example Asbestos and Hazmat Warning Labels and Signage Used at RMIT	
	<p>ACM Material Labels</p> <ul style="list-style-type: none"> Labels to be applied directly to ACMs where safe and practical. Surfaces to be cleaned SFARP before application, and/or foil or other tape applied below labels, to assist adhesion. Where labels are not directly applied to materials (e.g. floor tiles), black out direction arrows to show ACM location.
	<p>Historically, different ACM labelling formats have been used at RMIT. Examples of historical labelling provided to the left are considered suitable in accordance with current legislation, including Australian Standard 1319-1994 – <i>Safety signs for the Occupational Environment</i>, and do not need to be replaced unless damaged or unclear</p>

6.4.2 Buildings 10-12-14, & 201

Buildings 10, 12, 14, and 201 in the RMIT property portfolio have been determined could present a higher risk of Asbestos exposure to occupants if controls mentioned in this HBMMP are not well maintained.

As such RMIT have implemented supplementary measures, over and above those described in the HBMMP and required by law, including quarterly Asbestos Reinspection and Air Monitoring to provide further assurance that ACMs are being effectively managed in-situ and occupants and users of the buildings are not exposed to Asbestos.

Relevant background, agreed arrangement and recommended maintenance procedures for these buildings over and above the general requirements described in this HBMMP can be found in the following documents:

- [PS-8300 Asbestos Management Plan – Buildings 10,12 & 14](#)
- [PS-8302 Asbestos Management Plan – Buildings 201](#)

These AMPs must always be read in conjunction with the RMIT HBMMP and any other associated procedures.

6.5 Capital Works and Facility Maintenance

All works at RMIT sites must be conducted in accordance with the [PS-8259 Property Services Contractor Booklet](#).

Where building works (eg. maintenance or capital project) are conducted at an RMIT site, all contractors have HSE responsibilities, including in relation to Hazardous Materials.

It is critical that all contractors understand their roles and responsibilities in relation to HazMat, as set out in this HBMMP, prior to commencement of works. The RMIT Property Services Representative must be consulted if there are any questions or concerns relating to HazMat, other HSEQ issues, or contractor responsibilities.

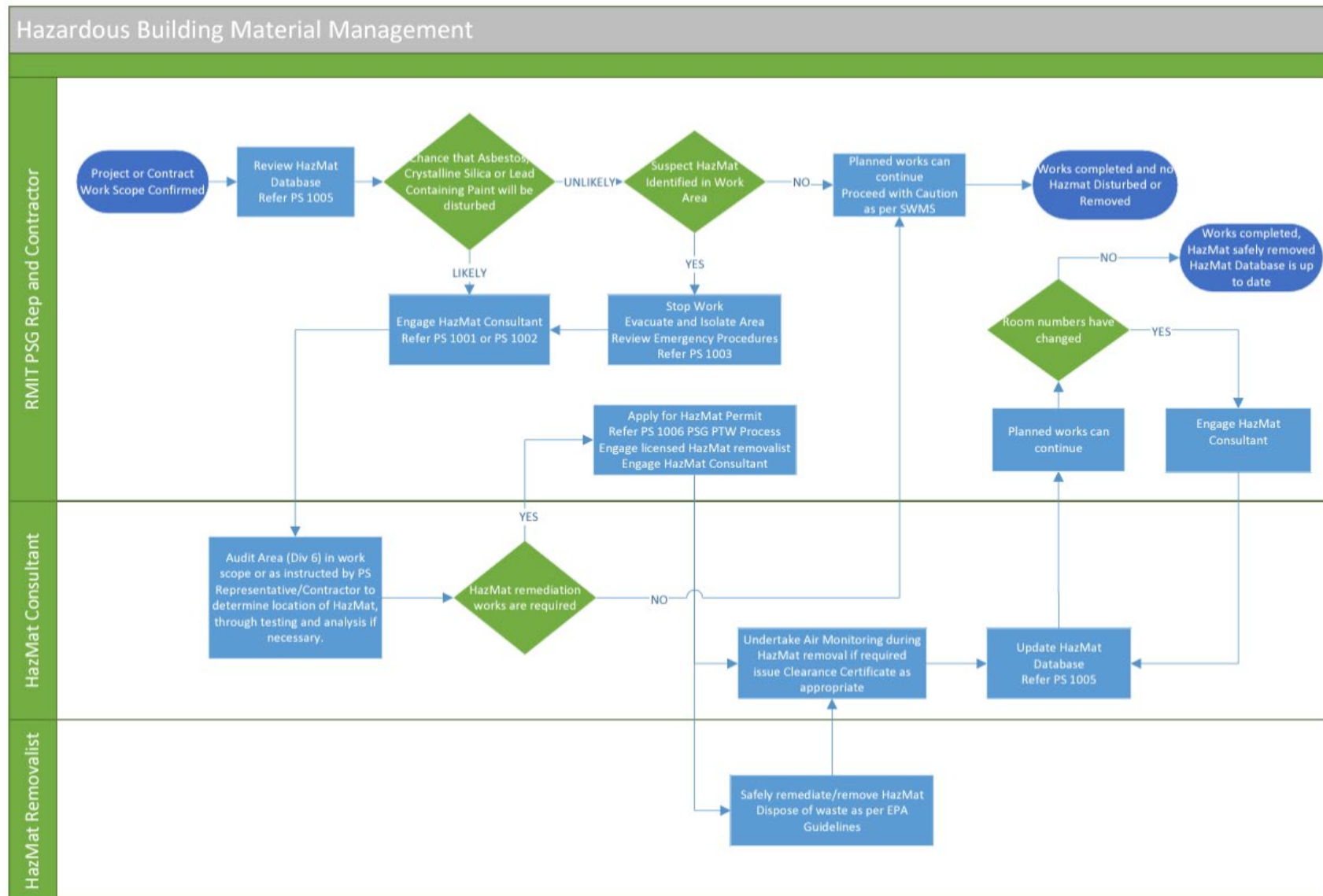
For any Building Works whether managed by RMIT or a Principal or Head Contractor, the Hazardous Building Materials Management Process Flow on the following page must be followed.

In many cases a [Permit to Work \(PTW\)](#) or HazMat PTW, will be required before works can proceed.

Where Specialist HazMat Contractors are required for the project and appointed by the Contractor, this must be in accordance with Work Instruction [PS-1002 HBMM – Contractor Managed Works](#).

Notwithstanding other HSE and contractual responsibilities, with regards to Hazardous Materials, it is the responsibility of the Contractor to ensure (and budget for) Hazardous Building Material Management.

6.5.1 Hazardous Building Material Management Process Flow – CW & FM



6.5.2 Desktop Review

Prior to any site works, a Desktop Review must be conducted. The purpose of the Desktop Review is to identify all HazMat that might be impacted by the proposed works, so that those materials can either be removed in advance (RMITs preferred option), or protected from accidental disturbance/presenting a risk to stakeholders.

The RMIT PS Representative is responsible for scoping required reviews or onsite inspections for the purpose of risk assessing or investigating hazmat within a proposed work area. The scope of these reviews must include all possible areas of impact by the works, including support and services works such as service risers, cable runs, installation from main supply etc. The RMIT PS Rep should seek guidance from the HSE Managers PS as required.

The Desktop Review will primarily involve:

- Review of the current Hazardous Materials Database for all areas, items and materials within the proposed work areas, and any adjacent areas that might also be impacted.

If, following review of the HazMat Database, there is uncertainty whether HazMat is present in the proposed work area, or if there are 'No Access' areas highlighted as potentially containing HazMat, arrangements must be made for the HazMat Consultant to conduct a site inspection and testing., refer [Section 6.5.3 HazMat Consultant Inspection and Assessment](#)

If, following review of the HazMat Database, all areas, items or materials within the proposed work area have been sufficiently confirmed as non-HazMat, site works can proceed with no additional actions required.

NB

Even if no HazMat has been identified during the Desktop Review, site works must still be conducted with due care. If additional potentially suspect HazMat is identified during works, works must cease and a further assessment be conducted (typically by the HazMat Consultant).

6.5.3 HazMat Consultant Inspection & Assessment

If there is insufficient information to confirm whether HazMat might be disturbed by the proposed works, following review of the Hazardous Materials Database during the project planning stage, a HazMat Consultant must be consulted and engaged as necessary to conduct further assessment.

Typically, further assessment by the HazMat Consultant will involve a site inspection and testing.

In the case of significant building, maintenance, renovation, or demolition works (including plant and equipment), and particularly where there are 'No Access' areas that might contain HazMat, it is likely that the site inspection will involve an intrusive 'Pre-Demolition or Major Refurbishment Asbestos Audit' in accordance with legislated requirements (colloquially referred to as a Div 6). Additional (non-asbestos) specified HazMat would be included in this Audit.

The scope of HazMat Consultant Inspection and Assessment will be determined by the Property Services Representative, in consultation with the Principal/Head Contractor, HazMat Consultant, HSE Manager, and others as necessary.

If the HazMat consultant identifies HazMat, and it might be disturbed by planned works, it is RMIT's preference the material is removed in advance. This must be discussed and agreed upon with the RMIT Project Representative. Refer [Section 6.5.6 HazMat Removal & Clearance](#).

The Hazardous Materials Database must be updated following the results of any site inspections or testing.

6.5.4 SWMS & HazMat Control Plan

Any works involving the disturbance, or potential disturbance, of HazMat at RMIT sites must be planned in advance and, as a minimum, a Safe Work Method Statement (SWMS) must be documented. The SWMS must be reviewed and approved by the RMIT Project Representative, in consultation with the HSE Manager and HazMat Consultant as necessary.

For licensed asbestos works, works involving disturbance of more than very minor quantities of lead containing paints, works that might generate more than minor concentrations of respirable silica dust, or large-scale removal of SMF, PCBs or refrigerant gases (ODS/SGG) a HazMat Control Plan (HMCP) will typically be required.

A HMCP will typically include details of Safe Work Methods, considerations for HazMat removal and disposal HazMat, and emergency procedures. For licensed removal of asbestos, an Asbestos Control Plan is a legislated requirement.

The site specific HazMat/Asbestos Control Plan must be completed for a HazMat Permit to Work to be issued.

6.5.5 HazMat Control Measures

Control measures may vary for specific HazMat materials and situations, however, for all HazMat works or disturbance, controls must typically be put in place to:

- Consultation and if necessary, relocation of staff in the affected area;
- Minimise disturbance of HazMat materials / generation of airborne contaminants.
e.g. use hand tools instead of power tools, use wet removal methods.
- Contain HazMat contamination/airborne contaminants inside the designated work area.
e.g. enclose the work area with plastic sheeting, close doors and windows, use negative air pressure fan units, maintain a 'decontamination zone' where PPE can be removed/put on.
- Protect HazMat workers from exposure.
e.g. ensure workers are appropriately trained/experienced/licensed, provide appropriate PPE, minimise potential exposure time.
- Prevent access to HazMat work areas for unprotected persons.
e.g. install signage and physical barricades/barriers to work area, inform persons in adjacent areas prior to works commencing.

6.5.6 HazMat Removal & Clearance

In limited situations lower-risk HazMat, such as SMF, very minor quantities of LCP and small items of PCB containing electrical equipment, may be removed without any specific contractor licensing requirements. However, appropriate controls must still be documented and adhered to, and it is likely that packaging and disposal of waste will still be subject to legislative requirements – including disposal at a licensed site or facility.

Where higher-risk materials are to be removed or otherwise disturbed, in particular ACMs, but also LCP in more than very minor quantities, or significant sources of respirable silica the works MUST be completed by an appropriately experienced and licensed contractor. In most cases this will be the RMIT Specialist HazMat Contractor Panel appointed Licensed Asbestos Removalist.

Following removal of any ACMs or higher risk HazMat, the HazMat Consultant must be engaged to assess the completion of works and provide a Clearance Certificate or otherwise suitable report confirming the areas are safe for normal occupation.

In most cases involving removal or disturbance (whether planned or accidental) of ACMs, and with some other HazMat (e.g. LCP or respirable silica), air monitoring or testing will be required during and/or on completion of works.

Additional details regarding removal of HazMat, including requirements for contractor licensing, air monitoring, clearance certification, and waste disposal, are provided in [Section 8 HazMat Specific Procedures](#).

The Hazardous Materials Database must be updated accordingly following hazardous materials removal works or other disturbance, including uploading of Clearance Certificates.

Refer to [PS-1005 Hazardous Building Materials Database Work Instruction](#).

6.6 Provision of HazMat Information

The HBMMP is available to all staff through the RMIT intranet site.

A reference to the HBMMP and an overview of its procedures is provided in [PS-8259 Property Services Contractor Booklet](#) which is publicly available through the RMIT website. All contractors will have access to the HBMMP and HazMat information via their RMIT Representative.

Prior to any Project Works, the RMIT Project Representative must arrange for contractors to have access to the [Hazardous Materials Database](#) for the buildings or areas within the project scope, including areas that are immediately adjacent or otherwise connected (e.g. by risers or air ducts).

Notwithstanding sensitive information considerations, even if project works are only to be conducted in specific areas of a building, the HazMat Database information for the whole building should be provided. This will assist the contractor in identifying potential HazMat that may not be currently accessible in their work area but has been identified elsewhere in the same building.

Contractors are required to review the HazMat Database and confirm this has been done in the PTW Application Form.

Staff and Contractors will be provided access to the Database in accordance with the procedures set out in [PS-1005 Hazardous Building Materials Database Work Instruction](#).

Additional Hazardous Materials information is also provided to staff and contractors via HazMat Training and Inductions, refer [Section 6.7 Inductions & Training](#).

6.7 Inductions & Training

To ensure all staff and contractors understand their responsibilities in relation to Hazardous Building Materials, and to prevent and mitigate the risks of accidental disturbance, HazMat Inductions and Training are provided by RMIT PSG HSE Managers.

Anyone undertaking works that might impact Hazardous Building Material must complete HazMat Inductions and Training.

Training and induction content is developed, reviewed and approved by the HSE Managers – Property Services.

Training and inductions for PSG staff and retention of training records is managed locally by the Property Services Quality and Compliance Team.

Training and inductions for Contractors are administered via the PSG Contractor Compliance Management Software (CCMS). Records of contractor training/induction attendance and completion are maintained in the CCMS.

All contractors must complete RMIT PSG & HazMat inductions, as set out in the Contractor Management System (CMS) and following the Gateway Process for onboarding contractors and initiating Project works.

Induction courses provided include:

Induction Course Reference	Recipients	Delivered by	Training Frequency
Hazardous Materials Induction Learning - Workday (myworkday.com)	PSG Capital Works and FAM Staff	Workday. Assigned by HSE Manager -CW	Every 2 years
PS-8273 Permit to Work Training	PSG Staff and PSG Contractors	HSE Manager - CW	As required
Contractor Property Services Induction	PSG Contractors	CCMS (currently SafetyNow)	Every year
Contractor HazMat Induction	PSG Contractors	CCMS (currently SafetyNow)	Every 2 years

The current CCMS Platform is SafetyNow, which allows for contractors and others to complete online inductions, register induction completion, and upload a range of supporting documentation.

The CCMS provides reminders when training and inductions are due, and automatically suspends contractor access to site when training, inductions and or documents have expired.

7 EMERGENCY PROCEDURES

In case of HazMat emergencies, including unanticipated discovery or disturbance of HazMat during project works, or elevated levels of airborne contaminants identified through air monitoring, the processes set out in this section **MUST** be followed.

The first steps to be taken in case of emergency are to:

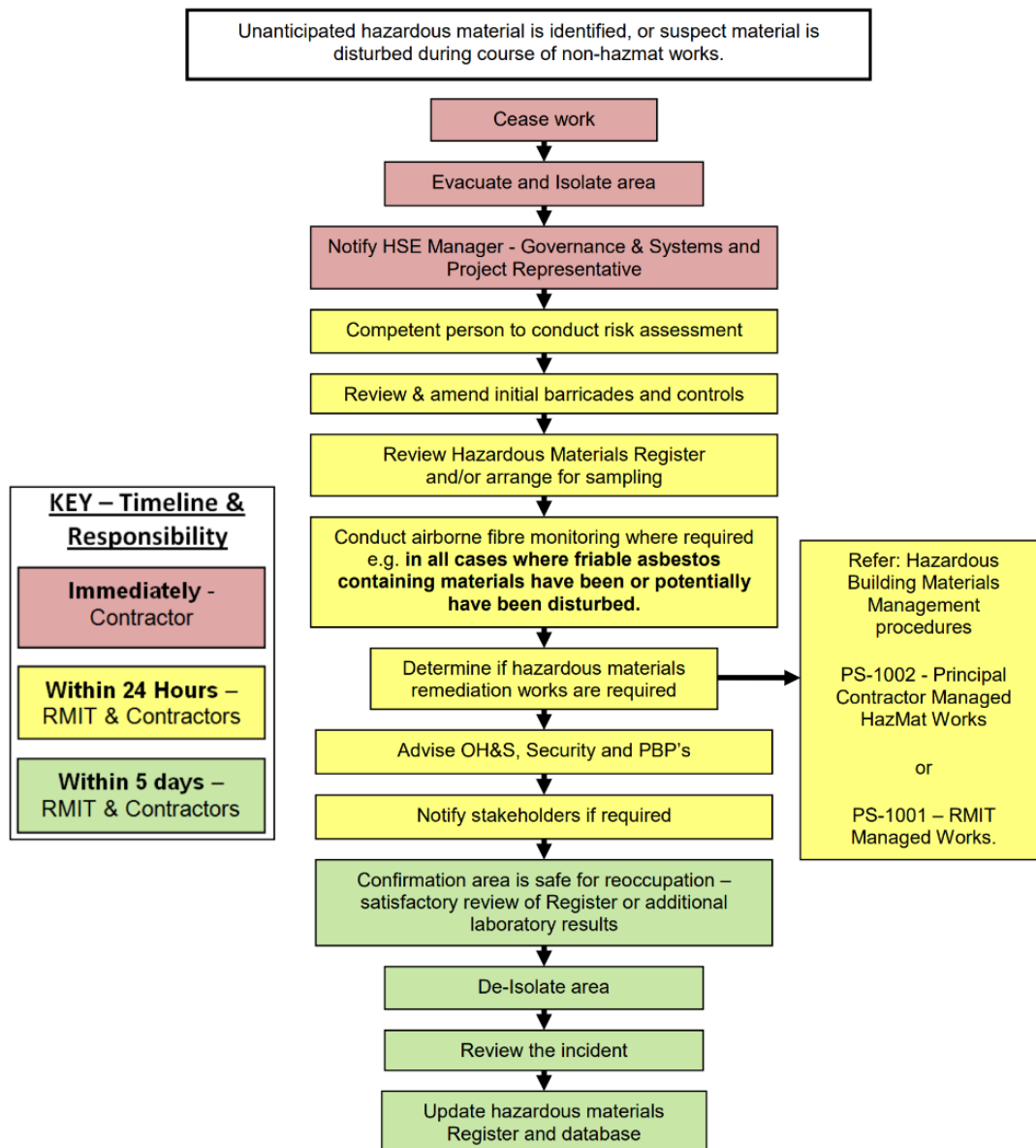
- Immediately cease work and make safe.
- Contact the RMIT Representative (ie Capital Works PM or Facilities Manager) and PSG HSE Manager.

Emergency procedures have been developed to address specific situations.

7.1 Unanticipated Find or Disturbance of Suspect Hazardous Materials

If, at any time, suspect HazMat is identified or disturbed, the process set out in procedure [PS-1003 HBMM – Unanticipated Finds or Disturbance of Suspect Hazardous Building Materials](#) MUST be followed.

The Process flow chart from this procedure is replicated below for quick reference.



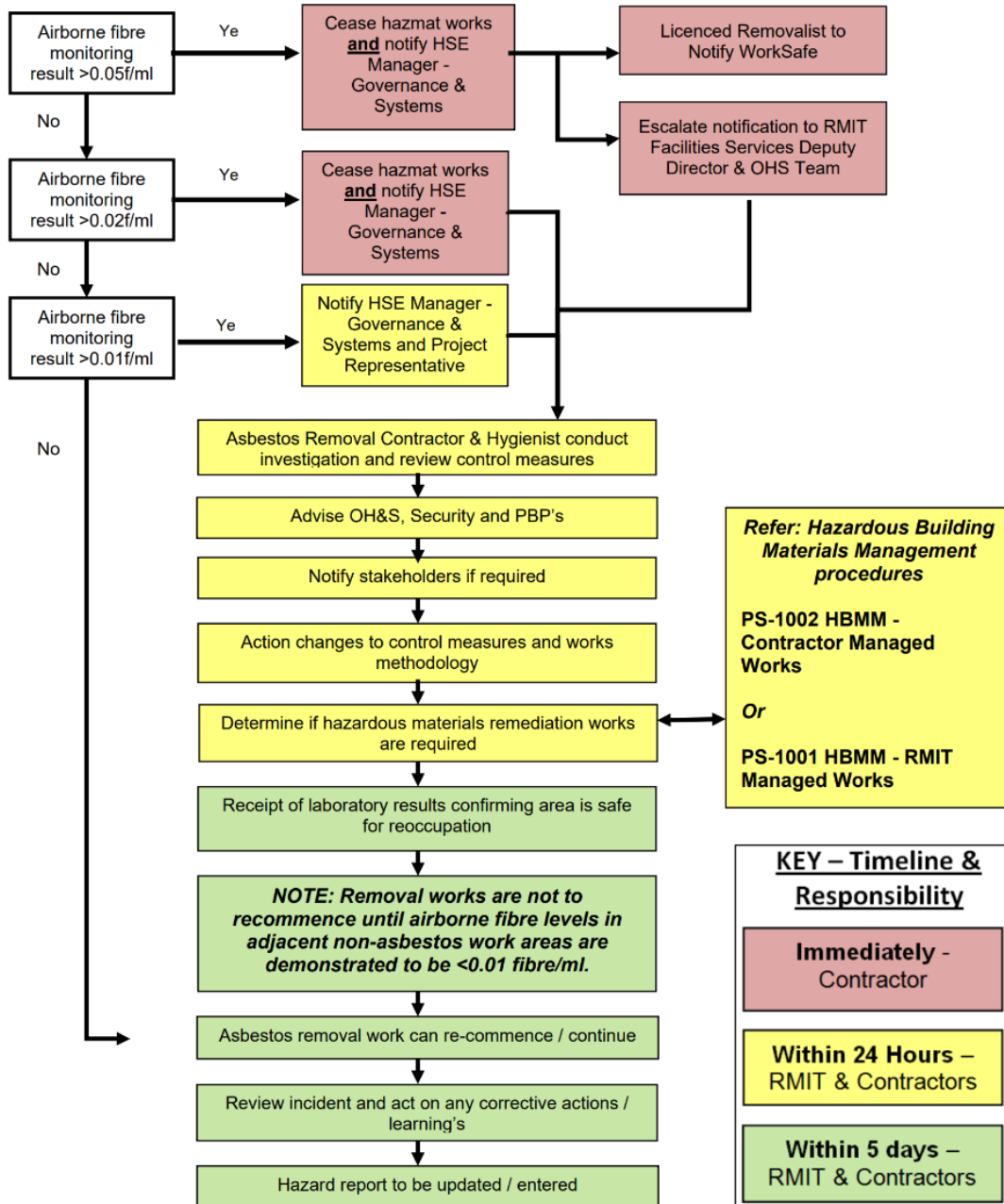
Infographic Source: PS-1003 HBMM – Unanticipated Finds or Disturbance of Suspect Hazardous Building Materials

7.2 Detectable Airborne (Asbestos) Fibre Monitoring Result

If, at any time, Asbestos Air Monitoring results are equal to or exceeding 0.01 f/ml, the process described in [PS-1004 Detectable Airborne Monitoring Results](#) MUST be followed.

If results are equal to or exceeding 0.05 f/ml, WorkSafe MUST be notified.

The Process flow chart from this procedure is replicated below for quick reference.



Infographic Source: PS -1004 Detectable Airborne Monitoring Results

8 HAZMAT SPECIFIC PROCEDURES

In addition to the HBMMP Procedures set out above, additional HazMat specific procedures have also been developed.

RMIT maintains a panel of approved HazMat Removal Contractors, who must be used for all works. Off-Panel consultants can be used only if there are extenuating circumstances requiring additional expertise (e.g. HazMat types not specifically addressed herein require removal or remediation).

Asbestos and Asbestos Containing Materials (ACMs) are considered to present the highest risk overall throughout the RMIT asset portfolio, due to their prevalence and potential health risks. Current OHS Legislation and Guidelines also set out more, and more stringent, requirements in relation to ACMs.

Asbestos safe work methods and control measures can be adopted as necessary for works with other HazMat.

8.1 Asbestos

8.1.1 Asbestos Removal

The removal of asbestos is considered appropriate when audits/inspections and the risk assessment process conducted by the HazMat Consultant has identified the ACM has deteriorated, has reached an unserviceable condition, or is at risk of being disturbed, and the other control options are not feasible.

Where ACM such as gaskets and seals are present, they should be removed and replaced during maintenance activities regardless of their condition to prevent exposure to airborne asbestos fibres.

The asbestos removal process must be managed so that the risk of increased airborne fibre levels is controlled. The work location must be isolated from surrounding areas and measures taken to prevent the escape of airborne fibres from the work location.

During the removal, control (static) air sampling will be carried out by a NATA Accredited Consultant Occupational Hygienist to ensure that the removal procedure used has kept the concentration of airborne asbestos dust to the minimum practical level (0.01 fibres/mL).

On completion of asbestos removal work, a clearance certificate is required to ensure that removal sites are left in a safe condition, free of residual asbestos material. An inspection report will be completed by the Mat Consultant/Occupational Hygienist who has carried out the air monitoring and analysis of surface dust during the asbestos removal project. To be able to issue a clearance certificate, a visual clearance inspection is carried out and static air samples indicate a clear result of <0.01 fibres/mL. On receipt of the clearance certificate the area can be re-occupied.

All Asbestos Works must be conducted by appropriately competent (trained, licensed, and experienced) individuals and organisations, in accordance with [current legislation and guidelines](#).

RMIT HazMat Removal Contractors are typically Licensed Asbestos Removalists, and ACM removal represents the most significant proportion of HazMat works throughout RMIT.

Whenever ACMs are removed or disturbed during HazMat works, [Asbestos Air Monitoring](#) will typically be required.

Friable ACMs

'Friable' ACMs are typically considered higher-risk, and more likely to generate airborne asbestos fibres if disturbed. Where Friable ACMs are removed, higher-level controls will usually be required. The HazMat Consultant and Licensed Asbestos Removalist must both be consulted to determine and agree upon Controls for any works with Friable ACMs.

Examples of higher-level controls may include:

- Installing a physical enclosure (or 'bubble') around the Asbestos Work Area.
- Using HEPA filtered fan units, to create a negative pressure within the work area.
- Using wet removal methods.
- Workers wearing full-face, powered (positive pressure) respirators.
- Full-time site presence of the HazMat Consultant and
- On-site decontamination units.

8.1.2 Recommended Maintenance Procedures to Mitigate Asbestos Exposure Risk

Where works at the site will disturb or potentially disturb ACM, the works should be conducted in accordance with the recommended maintenance procedures described in [PS-1019 Procedures Relating to the Potential Disturbance of Asbestos Materials](#).

These procedures should be applied in conjunction with RMIT's Hazardous Building Materials Management Plan and Permit to Work System.

A site and works specific risk assessment must be completed in consultation with the Facility Manager, PS HSE Manager – CW and Operations and if necessary, an RMIT approved HazMat Consultant and an Asbestos Control Plan or SWMS developed prior to commencement of work.

The site-specific HazMat/Asbestos Control Plan must be completed for a HazMat Permit to Work to be issued.

8.1.3 Asbestos Air Monitoring

HazMat Consultants will conduct asbestos air monitoring:

- Whenever there is uncertainty if ACMs have been accidentally disturbed to generate airborne asbestos fibres, or to provide evidence that this has not occurred. Also called 'Background' monitoring.
- During asbestos works, typically at the work area boundary or adjacent areas, to provide evidence that control measures are sufficient. Also called 'Control' monitoring.
- On completion of asbestos works, within the work area, to provide evidence the area is safe for reoccupation. Also called 'Clearance' monitoring and
- During HazMat audits/inspections, if potential ACM disturbance is caused or identified.

Air quality monitoring will be carried out using the internationally recognised sampling and analytical methodology in accordance with the "Membrane Filter Method for Estimating Airborne Asbestos Fibre" [NOHSC: 3003 (2005)].

All Asbestos Air Monitoring results must be below 0.01 fibres per millilitre (< 0.01 f/ml).

If Asbestos Air Monitoring results are equal to or greater than 0.01 f/ml, the Emergency Procedure described in [PS-1004 Detectable Airborne Monitoring Results](#) must be followed. Detection of asbestos fibres in the air may indicate an increased exposure risk to occupants and users of the building.

If results are equal to or exceeding 0.05 f/ml, WorkSafe MUST be notified.

8.1.4 Asbestos Work Area

An 'Asbestos Work Area', for the purposes of the HBMMP, is taken to be any area where:

- Asbestos removal or remediation works are being conducted. The area would remain classified as an Asbestos Work Area, up until the point at which RMIT receives a suitable Clearance Certificate from the HazMat Consultant (Hygienist).
- There are damaged ACMs present in accessible areas, which would otherwise be disturbed if the area was in normal use or
- It is considered likely that ACMs have been disturbed, and/or there is uncertainty whether or not this has resulted in an increased risk of airborne (asbestos) fibres.

The extent of any Asbestos Work Area, and the nature of the enclosure or boundary, must be decided upon in consultation with the HazMat Consultant and Licensed Asbestos Removal Contractor. In most cases there are legislated requirements depending on the type of material and situation.

Notwithstanding legislated requirements, at RMIT sites, all Asbestos Work Areas **MUST** be:

- Sufficiently isolated, from adjacent areas and other site or building occupants, to prevent transfer of potentially contaminated dusts or debris, or airborne asbestos fibres out of the Work Area.
- Notified, to adjacent occupants and others as necessary who might otherwise enter the Work Area or be affected by the works.
- Secured, sufficiently to prevent unauthorised access prior to issue of the Clearance Certificate and
- Clearly indicated at the boundary, and at all likely entrance points, with warning signage.

RMIT requires all Asbestos Work Areas to be clearly indicated at all entrance points with signage as shown below.

The Asbestos Work Area must be physically demarcated and separated from adjacent areas, as a minimum with hazard warning tape.



8.1.5 Personal Protective Equipment (PPE)

Asbestos exposure occurs through inhalation of asbestos fibres, which may be through the air, or via contamination on the hands or clothing.

The minimum legislated requirement for any works with, or disturbance of, ACMs is:

- A P2 (Protection Factor 2) respirator/dust mask.

Any persons entering an Asbestos Work Area, or area where airborne asbestos may present a risk, must wear a P2 respirator as a minimum.

Anyone conducting works with ACMs, or who might otherwise potentially contaminate clothing, must wear:

- Type-5, hooded, disposable coveralls.

Anyone handling ACMs must wear disposable gloves, or ensure hands are thoroughly washed immediately afterwards, and before eating/drinking/smoking/etc.

Where potentially friable or higher-risk materials are removed, additional PPE may be required, including:

- A full-face respirator, which may include a powered airline to provide positive pressure within the mask; and
- Disposable overshoes, or footwear that can be easily decontaminated (e.g. laceless gumboots).
- Respirators must comply with AS/NZS 1715 – 2009 *Selection, use and maintenance of respiratory equipment*.

Contractors **MUST NOT** wear/take PPE outside of the Work Area or decontamination zones, even if the PPE has not been used.

8.1.6 Asbestos Waste Disposal

All Asbestos Waste, including disposable PPE, cleaning cloths, and tools or equipment that can't be sufficiently decontaminated, must be:

- Appropriately packaged and labelled.
- Transported from site using an EPA registered vehicle.
- Disposed of at a site licensed to accept Asbestos Waste.

The Licensed Asbestos Removalist is responsible for transporting and disposing of all Asbestos Waste in accordance with legislated requirements.

Asbestos Waste may be stored on site until it is practical for removal, providing it is clearly labelled with asbestos warning signage, in suitable containers, and stored in a secure location. The HazMat consultant should be consulted for advice if Asbestos Waste is to be stored short-term.

8.2 Lead Containing Paint (LCP)

Lead Containing Paint (LCP) is defined as containing more than 0.1% lead by weight.

LCP in a fair to good condition is typically considered to present a low exposure risk and can be safely managed in-situ with periodic re-inspections and risk assessments.

Significant quantities of damaged or flaking paints, or associated dusts, may present a significantly elevated exposure risk. Older LCP may contain very high levels of lead (>30% by weight), and this can further increase exposure risks if the paint deteriorates.

Any works that involve mechanical disturbance or application of heat to LCP can significantly increase the risks of exposure to respirable dusts or lead fumes.

Any works or disturbance of LCP that are likely to result in elevated levels of LCP dust or lead fumes are likely to be classified as a 'Lead Process', in accordance with current legislation. As such, additional control measures are required to minimise generation of dust or fumes (safe work methods), contain any dust or

fumes generated within the work area (use an enclosure), and protect workers from personal exposure (provide appropriate PPE).

Refer also [Section 8.2.2 Lead Process & Lead Risk Work](#) below.

Where LCP is assessed as likely to be disturbed by proposed project works, typically during the project planning stage, the RMIT Representative and HazMat Consultant should be consulted to determine whether LCP should be removed or encapsulated, or other controls necessary to prevent exposure (e.g. enclosing work areas and using PPE).

8.2.1 LCP Removal & Encapsulation

Where LCP is identified as damaged or in poor condition, for example flaking or degrading to dust, and the material is accessible or likely to be disturbed, or if LCP is likely to be disturbed by planned project works, it is likely the paint will need to be either removed, encapsulated / surface sealed, or otherwise protected from disturbance.

Prior to any works involving disturbance of LCP, a Safe Work Method Statement (SWMS) must be provided to RMIT by the contractor undertaking the works. Suitable controls for LCP removal or remediation should be discussed and decided upon in consultation with the RMIT Project Representative, HSE Manager, HazMat Consultant, and others as necessary.

Removal or remediation of minor quantities of LCP can be conducted by a non-licensed contractor, provided appropriate basic controls are in place.

Removal of more than minor quantities of LCP or works in areas with significant quantities of deteriorating material, should be conducted by the Licensed Asbestos Removalist or a Lead Paint Removal contractor, adopting controls similar to those for asbestos removal.

LCP Removal

Controls for removal of LCP must be documented as a SWMS. For large-scale removal of LCP, a Lead Control Plan may need to be developed.

Controls for LCP removal must be agreed upon in consultation with the RMIT Project Representative, HSE Manager, HazMat Consultant, and others as necessary. Appropriate controls will typically include:

- Removing lead-painted items without disturbing the paint (e.g. remove doors/timber/metal items whole).
- Using wet removal methods (e.g. chemical stripping or wet sanding).
- Using hand tools to remove paint, instead of power tools.
- Placing drop sheets to collect material debris for disposal.
- Enclosing the work area to prevent lead dusts or fumes migrating elsewhere and
- Conducting air monitoring. Refer Lead Air Monitoring.

More than minor quantities of low-lead concentration waste may be considered as prescribed Hazardous Waste, which must be properly packaged, labelled, transported by an EPA licensed vehicle, and disposed of at a licensed disposal site, in accordance with current Industrial Waste Resource Guidelines (IWRG).

LCP Encapsulation

Encapsulation of LCP will typically involve removal of loose/degrading material (Refer LCP Removal above) and overpainting of remaining in-situ material.

Where LCP is encapsulated/paint sealed, appropriate controls will typically include:

- Cleaning of surfaces with sugar soap.
- Removal of surface gloss with a de-glossing solution (rather than sanding).
- Ensure new paint is lead-free, compatible with the existing paint and surface, and minimises leaching of lead to upper layers.
- Using oil-based paints so far as reasonably practicable (SFARP).
- Applying an undercoat/sealer.
- Applying two topcoats and
- Preparing & painting surfaces in accordance with AS 2311-2017 *Guide to the Painting of Buildings*.

8.2.2 Lead Process & Lead Risk Work

Works involving the disturbance of LCP may be considered to be a 'Lead Process' in accordance with current legislation and, therefore, higher level controls are likely to be necessary.

If a Lead Process might reasonably be expected to result in an increase in worker blood lead levels if, for example, after all reasonably practicable controls have been put in place there is still considered to be an elevated exposure risk, the work is likely to be classified as Lead Risk Work, in accordance with current OHS Regulations.

If performing a lead process is reasonably likely to cause an employee's blood lead level (BLL) to reach a certain threshold, that process is lead-risk work. The levels for determining lead-risk work are:

- 0.97 $\mu\text{mol/L}$ (20 $\mu\text{g/dL}$) or
- 0.24 $\mu\text{mol/L}$ (5 $\mu\text{g/dL}$) for female employees of reproductive capacity

Not all lead processes will be lead-risk work. The nature of the work and the controls in place, including personal hygiene, will determine whether a lead process becomes lead-risk work.

In Victoria it is a legal requirement that if an employer identifies that a lead process is lead-risk work, they must notify WorkSafe within seven days. Notification must be made using the Lead Risk Work notification form, available on the WorkSafe Victoria website.

If Lead Risk Work is being undertaken, there are additional responsibilities for the contractor, including biological monitoring and provision of information for workers.

8.2.3 Lead Air Monitoring

If there is uncertainty whether or not respirable lead dust or fumes present an unacceptable risk, for example to unprotected persons outside of a lead work area, or if the works are classed as Lead Risk Work, it is likely that Lead Air Monitoring will be required.

The HazMat Consultant must be engaged to conduct the monitoring.

Air samples must be taken and analysed in accordance with current Legislation and Guidelines. Samples must be analysed by a laboratory with NATA accreditation for the methods used, with results provided to RMIT as a NATA accredited Analysis Certificate.

The current 8-hour Time Weighted Average (TWA) exposure standard for inorganic lead is 0.05 mg/m^3 , and unprotected persons should never be exposed above this level.

8.3 Respirable Silica Dust

The Victorian Government introduced new regulations in 2022 aimed at minimising Victorian workers exposure to crystalline silica and also adding additional regulatory oversight of high-risk crystalline silica work outside of engineered stone across all industries. In response to these changes, RMIT issued a Silica Safety Alert, refer [Appendix C – Silica Safety Alert](#), detailing the changes and setting out RMIT processes and procedures that would be enacted.

8.3.1 Works Involving Silica

As set out in the RMIT Silica Safety Alert, to minimise exposure to respirable silica:

- The uncontrolled cutting of engineered stone is prohibited.
- Permit to Work Application (Section 6) is to be completed for works where you will be disturbing: Engineered stone, Sandstone containing >70% Crystalline Silica or any other product containing >70% Crystalline Silica. These works will need to be completed under Hazardous Building Material Conditions and will require Air-Monitoring by a Panel Hygienist.
- All other Crystalline Silica works performed at RMIT on material that contain crystalline silica that generates dust is to be classed as **High-Risk Crystalline Silica Work**, unless determined otherwise by testing and risk assessment.
- A crystalline silica hazard control statement (CSHCS) is required for all work performed on material that contains crystalline silica; and
- By law, employers/contractors must carry out [silica air monitoring](#) if they are not sure if their employees are exposed to levels of silica dust that are above the exposure standard.
- The table below provides an indication of likely concentrations of silica in different materials and should be used to assist with making decisions about controls and work methods.

Material Type	Typical % Silica
Marble	2
Limestone	2
Slate	25 – 40
Shale	22
Concrete	20 – 40 (may be higher)
Granite	20 – 45 (typically circa 30)
Natural Sandstone	70 - 90
Engineered Stone	Up to 97

Source: SafeWork Australia

If there is uncertainty, whether proposed works may generate respirable silica, or if works being conducted have generated respirable silica, the HazMat Consultant must be consulted to assist with reviewing control measures and provide air monitoring. Refer Silica Air Monitoring below.

Controls for works involving potential silica dust release should be selected based on the Hierarchy of controls. It is likely that a combination will be required.

- **Eliminate the Hazard**
Where practical, complete works without disturbing or using silica containing materials.
- **Substitution**
Use different work methods, less likely to generate respirable silica, or use lower silica materials.
- **Engineering Controls**
Isolate the work area. Use dust suppression tools/equipment (e.g. air exhausts, wet cutting/grinding).
- **Administrative Controls**
Adopt PTW system. Ensure all contractors are appropriately trained, licenced and experienced (competent). Restrict access to areas. Adopt decontamination procedure for exiting work area. Minimise the time for which workers are potentially exposed.
- **Personal Protective Equipment**
Appropriate respirators (minimum P2 rated, full-face and powered for higher risk works). Disposable (Type 5) coveralls. Disposable overshoes. Sealed goggles.

8.3.2 Silica Air Monitoring

If there is uncertainty whether or not respirable silica presents an unacceptable risk, for example to unprotected persons outside of a silica work area, it is likely that Silica Air Monitoring will be required.

The HazMat Consultant must be engaged to conduct the monitoring.

Air samples must be taken and analysed in accordance with current Legislation and Guidelines. Samples must be analysed by a laboratory with NATA accreditation for the methods used, with results provided to RMIT as a NATA accredited Analysis Certificate.

The current 8-hour Time Weighted Average (TWA) exposure standard for silica dust is 0.05 mg/m³, and unprotected persons should never be exposed above this level.

WorkSafe Victoria recommends that employers take a precautionary approach and reduce employees' exposure to below 0.02 mg/m³ as an 8-hour TWA to prevent ill health effects.

ALL work where you will be disturbing: Engineered stone, Sandstone containing >70% Crystalline Silica or any other product containing >70% Crystalline Silica. Will need to be completed under Hazardous Building Material Conditions and will require Air-Monitoring by a Panel Hygienist.

8.3.3 Silica Building Materials – Purchasing Policy

In response to the 2022 Victorian legislation changes for Silica, RMIT has now put administrative controls in place, to prevent higher risk materials being purchased/installed in the first instance:

- Use of engineered stone for benchtops is prohibited. Silica-free or material with less than 30% Silica to be used that is fit for intended use (compact laminate/Trespa/grey granite for balance tables or equivalent); and
- The following new material selections are prohibited on all RMIT projects:
 - Engineered stone
 - Sandstone containing >70% Crystalline Silica
 - Any product containing >70% Crystalline Silica

8.4 Ozone Depleting Substances (ODS) & Synthetic Greenhouse Gases (SGG)

ODS & SGG are present throughout RMIT, in significant overall quantities, as gases within refrigeration units, cooling plant, and air conditioning systems – 'Refrigerant Gases'.

Older refrigerants are likely to be CFCs (Chlorofluorocarbons) or HCFCs (Hydrochlorofluorocarbons). When release into the atmosphere, chlorine in these compounds reacts in the upper atmosphere and acts to destroy ozone.

Later refrigerants may be HFCs (Hydrofluorocarbons) and are less damaging to ozone. However, these compounds have been recognised as significant greenhouse gases, many times more potent than CO₂. HFC134a, for example, is 1,430 times more potent as a greenhouse gas than CO₂.

Legislated requirements are in place for any persons conducting works on refrigeration equipment or handling refrigerant gases.

All contractors conducting works with refrigeration units and systems, or handling refrigerant gases, MUST hold a current Refrigerant Handling Licence, appropriate for the works they are undertaking.

Further information can be found at <https://www.arctick.org/refrigerant-handling-licence/licence-types/>

8.5 Polychlorinated Biphenyls (PCBs)

PCBs are a broad class of environmentally persistent/bio-accumulative compounds, of varying toxicities, that have been linked to a number of health and environmental effects. PCBs may be solids or liquids.

PCB containing electrical equipment has been identified or presumed present throughout RMIT. Typically this is in the form of small capacitors, and mostly associated with fluorescent light fittings (given the significant quantity of these items).

Significant quantities of PCBs may be present in large electrical equipment such as mains/substation transformers.

PCBs may also be found as lubricating or hydraulic fluids.

Where PCB containing items are in a good, sealed condition, they are typically safe to be managed in-situ.

As PCBs are typically found within items of electrical equipment, that are not opened during most HazMat Audits, they may not be recorded in the Hazardous Materials Database, or there may be blanket assumptions of 'potential PCBs' in multiple fluorescent light fittings throughout a building.

Suspect PCB containing equipment can be identified as:

- Pre-1975 electrical items (when a ban on importation was enacted)
- Typically metal, rather than plastic, capacitors and
- As set out in Australian and New Zealand Environment and Conservation Council (ANZECC) *Identification of PCB-Containing Capacitors* (1997).

8.5.1 PCBs – Removal & Disposal

The minimum PPE requirement for handling PCB containing equipment is nitrile gloves and enclosed goggles.

PCBs are a prescribed Hazardous Waste and must be removed and disposed of in accordance with the requirements of EPA Polychlorinated Biphenyls (PCB) Management (IWRG643.2) 2017

Larger quantities of liquid PCBs, such as those found in substation transformers or other significant electrical equipment, will require engagement of a specialist contractor and additional documented controls and Safe Work Methods.

In most cases it is envisaged that removal of PCBs would be limited to overall minor quantities during upgrade works for plant, equipment, and fluorescent lighting, and that these would be in the form of sealed capacitors.

Removal of minor quantities of PCB capacitors would not typically require a Specialist HazMat Contractor, however this should be discussed at the Project planning stage.

Where PCB capacitors are in a good, sealed condition they should be:

- Removed with due care; and
- Placed into metal drums or containers, double-lined with 200-micron thick plastic.

Waste drums must be clearly labelled with 'Danger – PCB Waste' 'Prescribed Hazardous Material', with plastic lining sealed shut, and metal lids secured.

If PCB capacitors are damaged or leaking, the [PCBs Emergency Procedures](#) should be followed.

8.5.2 PCBs - Emergency Procedures

In case of minor PCB spillage or release, the following procedure must be followed:

- Avoid direct skin contact.
- Wear nitrile gloves when handling any material that may be contaminated with PCBs.
- Use absorbent material to contain the spill (e.g. 'bundling').
- Use absorbent material to soak up the spill.
- Once all liquid is absorbed, transfer the contaminated material into thick plastic bags/package, and double wrap the material.
- Double wrapped material should be placed in a sealed metal container and labelled with 'Danger PCB Waste' 'Hazardous Waste' or similar clear warning.
- Residual surface contamination should be cleaned with organic solvent and cleaning cloths. Kerosene is recommended, but consideration should be given to risks of fire.
- All contaminated material should be double wrapped and placed in the metal container.
- Hands should be washed thoroughly.

8.6 Synthetic Mineral Fibre (SMF) Products

Synthetic mineral fibre (SMF) products have been used extensively throughout RMIT as building materials, insulation, and surface finishes.

Exposure to some types of SMF, such as very high temperature ceramic fibres (used in power stations), have been linked to cancers. Other types of SMF can cause irritation to the eyes, skin and respiratory tract.

SMF products may be bonded or compressed, or more loose fibres. The type of material and method of disturbance or removal will significantly affect the potential generation of loose fibres and potential health effects.

Any works with, or disturbance of, SMF products must be in accordance with the requirements of National Code of Practice for the Safe Use of Synthetic Mineral Fibres [NOHSC:2006 (1990)].

As a minimum, any works involving disturbance of SMF will require PPE.

- P2 Respirator.
- Enclosed goggles.
- Type 5 Disposable Coveralls.

Disturbance of more than minor quantities of SMF is likely to require additional controls and Safe Work Methods. This should be discussed with the RMIT Project Representative, and, if necessary, the HazMat Consultant, and agreed upon/documentated in advance.

Examples of additional controls may include:

- Enclosing the work area (e.g. with plastic sheeting),
- Creating a negative pressure work area and
- Air monitoring.

8.6.1 Building 11 – Specific Procedure

Opening of ceiling hatches, working on services affixed to ceiling and any other tasks which may involve disturbing the ceiling structure of Building 11, level 3 is considered a task that has the potential to significantly disturb Synthetic Mineral Fibre (SMF).

The procedure [PS-1023 Contractor Minimum Requirements: Disturbance of Ceiling Void in Building 11](#), described the minimum requirements that must be implemented to ensure this task is undertaken safely and exposure of personal to airborne SMF is limited or eliminated if possible.

9 SUPPORTING DOCUMENTS AND INFORMATION

This section contains links to legislation/regulations/codes of practice and Australian (AS, AS/NZS) and International Standards (ISO); associated policies, procedures, and resources identified as having a direct association with this document.

Legislation/Regulations	Refer Section 1.3 this document
RMIT Policies, Procedures & Resources	Website for Health, Safety and Wellbeing
Property Services Policies, Procedures & Resources	<ul style="list-style-type: none"> • PS-1001 HBMM – RMIT Managed Works • PS-1002 HBMM – Contractor Managed Works • PS-1003 HBMM – Unanticipated Finds or Disturbance of Suspect Hazardous Building Materials • PS-1004 HBMM – Asbestos Management Plan Detectable Airborne Monitoring Result • PS-1005 HazMat Database Work Instructions • PS-1006 PSG – Permit to Work Process • PS-1008 Hazmat Survey Works Notice Template Indigenous • PS-1009 Hazmat Removal Works Notice Template Indigenous • PS-1018 Property Services Approved Suppliers: Specialist Hazmat Contractors: Class A Removalists and HazMat Consultant/Hygienists • PS-1019 Procedure Relating to the Potential Disturbance of Asbestos Material • PS-1020 HBMM – Labelling • PS-1023 Property Services Contractor Minimum Requirements: Disturbance of Ceiling Void in Building 11 • PS-1026 Property Services Contractor Management System • PS-1029 Quick Reference - Standard User - Hazmat Database • PS-8259 Property Services Contractor Booklet • PS-8273 Permit to Work Training • Hazardous Material Induction – Workday Training Module • PS-8300 Asbestos Management Plan Buildings 10, 12 & 14 • PS-8302 Asbestos Management Plan Building 201 • Hazmat Permit to Work Application Form • RMIT HazMat Database <p>The PSG Procedures and Resources are located and accessible via the</p>

	Property Services SharePoint Hub for Hazmat . If you are unable to access the documents via the link please contact your Property Services Representative who can provide a PDF copy.
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10 DOCUMENT STATUS AND DETAILS

This section contains information about the status, approval and implementation of this document, contact details for enquiries about document application/interpretation, and a brief summary of changes between this and the previous version.

REVIEW PERIOD

This HBMMP will be reviewed:

- As a minimum, and in accordance with Asbestos legislative requirements, 5 yearly.
 - Internal review of contents and process 2 yearly.
- On request by a relevant internal or external Authority (e.g. HazMat Consultant, HSE Manager, WorkSafe, EPA).
- If there is evidence to suggest current HazMat policies or procedures may not be sufficient to manage associated Risk or achieve the HBMMP Objectives, for example in response to a HazMat related Incident or Non-Conformity.
- If there are changes to HBMMP related internal policies and procedures.
- In response to changes in Legislation or Standards.

Issue Date	October 2015
Revised Date	February 2026 (Full Review) February 2025 (Update to Appendix B, Crystalline Silica requirements and PTW requirements only)
Review Date	April 2026

ACCOUNTABILITIES

Development/Review	Property Services HSE Manager, Systems and Governance, Reporting & Compliance
Process Owner/Originator	Property Services HSE Manager, Systems and Governance, Reporting & Compliance
Approval Authority	Property Services SLT Representative Approval

AMENDMENT RECORD

Issue No	Issue Date	Nature of Amendment
2.1	13/10/2015	Added text from the Hazmat Policy under Scope and Exclusions.
2.2	21/12/2015	Changed 'Facilities Services' to 'Facilities & Asset Management' Added KPI's under Procedure Effectiveness and Review Period.
2.3	31/3/2017	Update to RC, reference to supporting docs including HMMP, update and reiteration of PLT process, PTW, procurement methodology, scoping and responsibilities.
2.4	15/12/2017	Update to 2017 OHS Regulations
2.5	04/04/2018	Update to include reference to the RMIT hazmat database.
2.6	25/02/2022	Review of entire document, rebranding and change of document reference.
2.7	29/03/2023	Review of document, update links to new RMIT Property Services SharePoint and PTW Procedure.
3.0	11/04/2024	<p>Updated to reflect:</p> <ul style="list-style-type: none"> • current OHS and Environmental legislation. • best practice HazMat Management • current RMIT and PSG business practices and procedures <p>Added a section for "Leased Spaces".</p> <p>Updated and streamlined HazMat Management Process Flow Diagram.</p> <p>Agreed and updated Roles and Responsibilities in consultation with key stakeholders.</p> <p>Reformatted to provide detailed table of contents to enable easier navigation.</p> <p>Links to supporting procedures removed from the body of the document. Summary of associated procedures to be maintained in a separate section, where a link to the PSG SharePoint Hub is provided.</p>
3.1	13/02/2025	<p>Update to Appendix B: PS-1018 Property Services Approved Suppliers - Specialist Hazmat Contractors only.</p> <p>Full review to be completed in April 2026.</p>
3.2	26/02/2025	Update to Crystalline Silica requirements and PTW requirements.

Issue No	Issue Date	Nature of Amendment
		Full review to be completed in April 2026.
3.3	19/02/2026	Removed all reference to Building 108 Removed Kennedy's as a Hazmat Panel contractor Removed any reference to Rapid Global and replaced with Safety Now Next full review to be completed in 2031

11 APPENDICES

APPENDIX A: ACMs at RMIT

ACMs are present at RMIT sites, in most pre-1980 buildings. Any building or maintenance work may potentially disturb ACMs.

- Structure and fabric of buildings.
- Surface finishes.
- Building services.
- Plant and equipment.

For risk management and legislative purposes, ACMs are broadly classified as either 'Friable' or 'Bonded' / 'Non-Friable'.

Friable ACMs

- 'when dry, may be crumbled, pulverised or reduced to powder by hand pressure'.
- When disturbed, are significantly more likely to generate airborne asbestos fibres than Bonded ACMs under similar conditions.
- Are likely to require more stringent controls, such as removal or encapsulation.
- May require more frequent reinspection and risk assessment, including air monitoring, for areas to be considered safe.

Bonded ACMs

- Typically consist of asbestos fibres well bound within another material, such as plastic, resin or cement.
- Can often be managed with basic controls, such as labelling to prevent accidental disturbance, and 5 yearly reinspection.
- When disturbed, are significantly less likely to generate airborne asbestos fibres than Friable ACMs under similar conditions.
- Some very well bonded ACMs, such as vinyl floor tiles and black tar resin electrical boards, present a negligible risk of generating airborne fibres without significant and prolonged mechanical abrasion.

Building Materials that may contain Asbestos	Photographic Examples
<p>Asbestos Cement Sheet (flat or corrugated)</p> <ul style="list-style-type: none"> • External roofing, infills or building surfaces. • Internal walls in plant areas and wet rooms. • Linings to building voids and risers. • Backing and underlay to wall and floor tiles. 	
<p>Asbestos Cement Pipes, Ducts & Pits</p> <ul style="list-style-type: none"> • Water & drainage pipes. • Conduits for building services. • Flue pipes to boilers and heater. • Moulded telecoms pits 	

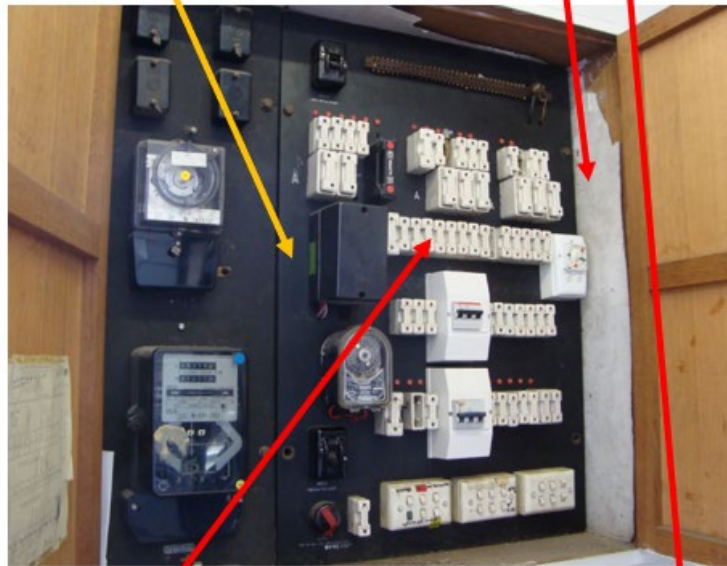
Building Materials that may contain Asbestos

Photographic Examples

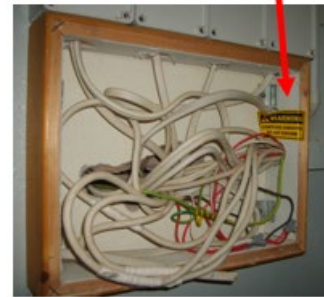
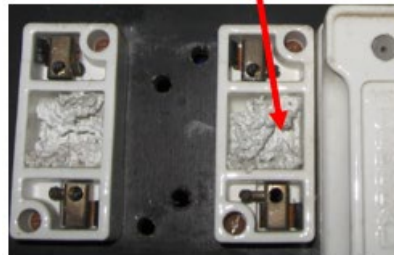
Fuse boards and control boxes may contain multiple ACMs.



Asbestos Resin Board (Black)



Asbestos Board/Paper Lining




Woven Asbestos Fuse Blankets



Building Materials that may contain Asbestos	Photographic Examples
<p>Pre-1980 ductwork and equipment may contain multiple ACMs.</p>	 <p>Asbestos Board/Paper Lining to Electrics & Heating</p> <p>Asbestos Putty to Flange Joints</p>
<p>Bitumen-based ACMs can be found as surface coatings and adhesives.</p> <ul style="list-style-type: none"> • Adhesives – typically to flooring tiles and finishes. • Coatings to pipework - typically chilled water / chiller pipework. • Pads/coatings to the back of metal sinks/urinals. • Bitumen roofing / waterproofing membranes. 	

Building Materials that may contain Asbestos	Photographic Examples
<p>Plant & Equipment may contain multiple ACMs.</p> <ul style="list-style-type: none"> Asbestos gaskets (woven textile or compressed sheet type). Insulating boards & paper to internal hot surfaces. Plaster type, 'hard-set' asbestos lagging to boilers. Moulded asbestos cement components. 	
<p>Asbestos insulation to pipework may be a number of materials.</p> <ul style="list-style-type: none"> Plaster type 'hard-set' lagging (hand applied). Woven textile materials. Bitumen-based coatings (typically chilled water/chiller pipework). Pre-formed, half-round sections. 	

Building Materials that may contain Asbestos	Photographic Examples
<p>Asbestos pipe insulation may be concealed under layer materials and wrappings.</p> <ul style="list-style-type: none"> • Asbestos insulation within pre-1980 fire-doors. • Asbestos putty / caulking to building joints and window frames. • Asbestos vinyl floor tiles (and adhesives below). • Asbestos brake pads to lift plant (potentially up until 2003). 	

APPENDIX B: PS-1018 Property Services Approved Suppliers

Specialist Hazmat Contractors: Class A Removalists and HazMat Consultant/Hygienists

Details current at time of February 2025

Property Service Hazmat Approved Vendors						
Service Type	Vendor Options	Vendor Name	Contact Person	Position Title	Email Contact	Phone contact
Hazmat- Class A Removalists	4	AAH Contracting P/L	Wayne McCann	Project Manager	wayne@aahcontracting.com.au	0466 457 386
		Australasian Technical Services (Vic) Pty Ltd	David Kang	Director	dkang@atstech.com.au	0412 521 888
		Elite Building & Environmental Services P/L	Tim Ngo	Managing Director	tim@eliteau.com	0418 664 423
Hazmat- Consultant	4	BENSS Australia	Mark Francis	Managing Director	mark-francis@benss.com.au	0432 792 377
		SLR Consulting Australia P/L	James Bracken	Associate Consultant – Occupational Hygiene & Hazardous Materials	jbracken@slrconsulting.com	0428 788 513
		JTA Environmental, Health & Safety Specialists P/L	Elden Pereira	Sales Operations Manager	eldenp@jta.com.au	0493 052 120
		Prensa	Tyler Faulkner	Managing Consultant	Tyler.faulkner@prensa.com.au	0400 579 551

APPENDIX C: Silica Safety Alert

RMIT Classification: Trusted

Safety Alert - Property Services Group

Preventing Respirable Crystalline Silica Exposure

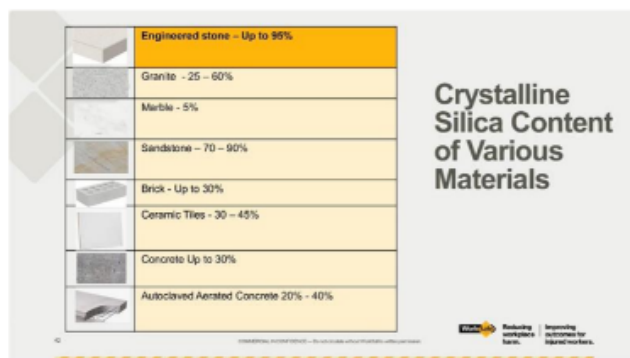
Issue Date: 24, March, 2023

Context:

The Victorian Government introduced new regulations in 2022 aimed at minimising Victorian workers exposure to crystalline silica and also adding additional regulatory oversight of high-risk crystalline silica work outside of engineered stone across all industries.

Hazard:

What is Respirable Crystalline Silica ? This is a form of Silica dust it is found in some stone, rock, sand, gravel, and clay. The most common form is quartz. Silica dust can also be found in the following products:



When these materials are worked on, silica is released as a fine dust known as respirable crystalline silica or silica dust.

Silica dust is harmful when inhaled into your lungs. Exposure to silica dust can lead to the development of silicosis (an irreversible scarring and stiffening of the lungs). It is estimated that 230 people develop silicosis each year as a result of past exposure to silica dust at work. Not all exposed workers will develop silicosis; silicosis risk increases with long-term or repeated high-level exposure.

Who is at risk

The workers most at risk of exposure to silica dust are those who use power tools or mechanical equipment on silica containing stone or rocks and products that contain silica.

Moving Forward at RMIT

1. The uncontrolled cutting of engineered stone is prohibited.
2. All work performed at RMIT on material containing crystalline silica that generates dust is to be classed as **High-Risk Crystalline Silica Work**, unless determined otherwise by testing and risk assessment. By law, employers must carry out air monitoring if they are not sure if their employees are exposed to levels of silica dust that are above the exposure standard.
3. A crystalline silica hazard control statement (CSHCS) is required for all work performed on material that contains crystalline silica.
4. RMIT PSG Design Stds to be reviewed and updated to
 - I. Prohibit the use of Engineered stone
 - II. Prohibit the use of Sandstone containing >70% Crystalline Silica
 - III. Prohibit the use of any product containing >70% Crystalline Silica

Safety Alert - Property Services Group

Preventing Respirable Crystalline Silica Exposure



Issue Date: 24, March, 2023

How to Manage the Risk

HOC	Controls
Eliminate Get Rid Of	Use materials that do not contain crystalline silica
Substitution Change/Replace	Use materials with a lower crystalline silica content Using fibre cement sheet sheers instead of circular saws
Isolation Separate	Use automated machines, Fully enclosed work areas with high efficiency air filtration Apply exclusion zones
Engineering Controls	No dry cutting, use wet methods Use on tool water suppression technology or dust extraction Use well positioned local exhaust ventilation Use H or M-class vacuums
Administrative Controls Instructions & Signs	Design shift rotations and limit task times Use signage to warn of silica dust hazards in the area Design housekeeping and cleaning policies Prepare a safe work method statement (SWMS)
PPE	Provide respiratory protective equipment (RPE) with a suitable protection factor

Click here to enter text.

Comments: For further guidance from WorkSafe Victoria.

<https://www.worksafe.vic.gov.au/pdf/crystalline-silica-safety-basics>

<https://www.worksafe.vic.gov.au/resources/preparing-crystalline-silica-hazard-control-statement-high-risk-crystalline-silica-work>

