

Asbestos Management Plan



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1. ASBESTOS MANAGEMENT POLICY



This policy provides the direction and commitment by Energy Queensland and its group of companies to achieve an asbestos free environment in its buildings and facilities.

Purpose

The purpose of the policy is to:

- Support compliance with relevant legislation, standards and codes of practice for asbestos management.
- Undertake a proactive program to remove asbestos from its buildings and facilities by 2030, where it is reasonable and practical to do so.
- Safeguard employees, contractors, customers and the community from exposure to asbestos containing materials.
- Ensure alignment with Energy Queensland's asset safety policies and plans.

Implementation

The objectives of this policy will be achieved by the implementation of the Asbestos Management Plan.

Our Commitments

The Policy is underpinned by the following commitments:

- Workers that are likely to disturb asbestos during work have the appropriate training and equipment available along with Safe Work Methods to work with and remove asbestos containing material in a safe and effective manner.
- Energy Queensland will have in place an annual prioritized Asbestos Removal Program.
- Buildings with asbestos containing material will not be purchased or leased unless a prior risk assessment is undertaken and all reasonable alternatives have been exhausted.
- Energy Queensland will undertake risk based property surveys for High Risk sites annually, Moderate Risk Sites 3 yearly and Low Risk sites, as a minimum, every 5 years.
- Energy Queensland will implement proactive procurement management practices to ensure asbestos containing materials are not imported and used in new buildings, plant and/or equipment.
- Energy Queensland will continue to proactively consult with workers, Trade Unions and other key stakeholders in relation to the management and elimination of asbestos from our workplaces.

Policy Management and Review

The Energy Queensland Asbestos Manager is responsible for managing the implementation, monitoring and review of the Policy.



Rod Duke
Chief Executive Officer

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2. INTRODUCTION

Energy Queensland (EQL) has made a commitment to the workers, contractors and the public for its buildings and facilities to be asbestos free by 2030. This is being achieved by pro-actively minimising the risk of asbestos exposure to workers, contractors and the public, through eliminating asbestos from our buildings, facilities and plant where reasonably practicable. While this is occurring, EQL will manage the asbestos hazard and risk through ongoing identification, evaluation, training, the use of Safe Work Method Statements (SWMS) and monitoring of the condition of insitu asbestos.

Energy Queensland has a structured, risk-based approach to the removal, management and control of asbestos containing materials (ACM) within the workplace. This approach includes the use of licensed and accredited specialists, planned surveys, inspections and the storage and maintenance of comprehensive records. ACM's are assessed for condition status and any ACM identified as being in poor condition or deemed High Risk will be given immediate priority for remediation works.

Energy Queensland is committed to consultation, information-sharing and involvement by employers, workers, trade unions, contractors and others within the workplace, through the process of identifying ACM, maintaining this Asbestos Management Plan (AMP), assessing the risks and developing and implementing control measures. This Plan is to be read in conjunction with safe systems of work and the site-specific asbestos registers and plans generated from the Energy Queensland electronic asbestos database located on the Asbestos Management SharePoint site or through the onsite Quick Response code (QR)

2.1. Purpose

The purpose of this AMP is to set out the steps to be taken to eliminate or otherwise minimise the risks of exposure to airborne asbestos fibres in the workplace, including the identification of ACM, risk assessments and the development and implementation of control measures and safe working methods to manage the asbestos hazard to as low as reasonable practicable (ALRP). This AMP has been developed to align and in some cases exceed the requirements of the Queensland *Work Health and Safety Regulation 2011*.

2.2. Scope

This AMP applies to all employees and external service providers undertaking work for or on behalf of the Energy Queensland group of companies and provides a general plan focusing on the removal and management of ACM within all EQL managed or controlled buildings, facilities, company owned residences and workplaces within Queensland. For any operations performed outside Queensland a separate AMP is required to be developed using this document as a basis but considering specific States and Territories WHS Acts, Regulations and Codes of Practices. No other AMP can state controls that are of a lower level than those outlined in this document.

3. DEFINITIONS, ABBREVIATIONS AND ACRONYMS

Accredited Laboratory: A testing laboratory accredited by the National Association of Testing Authorities, Australia (NATA) or a similar accreditation authority, or otherwise granted recognition by NATA, either solely or in conjunction with one or more other persons.

Air Monitoring: Airborne asbestos fibre sampling to assist in assessing exposures and the effectiveness of control measures. Air monitoring includes exposure monitoring, control monitoring and clearance monitoring.

Airborne Asbestos Fibres: Means any fibres of asbestos small enough to be made airborne. For the purposes of monitoring airborne asbestos fibres, only respirable asbestos fibres (those fibres less than 3 µm wide, more than 5 µm long and with a length to width ratio of more than 3 to 1) are counted.

ALRP: As Low as Reasonable Practicable

AMP: Asbestos Management Plan.

Appropriately Qualified Person: Means the person possesses the qualifications and experience necessary to conduct the required works.

Asbestos: Means the fibrous form of mineral silicates belonging to the serpentine and amphibole groups of rock-forming minerals, including chrysotile (white asbestos), amosite (brown asbestos), crocidolite (blue asbestos), tremolite, actinolite, anthophyllite or any mixture containing one or more of the mineral silicates belonging to the serpentine and amphibole groups.

Asbestos Cement (AC): Means products consisting of sand aggregate and cement reinforced with asbestos fibres (e.g. asbestos cement pipes and flat or corrugated asbestos cement sheets).

Asbestos-contaminated dust or debris (ACD): Means dust or debris that has settled within a workplace and is (or assumed to be) contaminated with asbestos.

Asbestos Containing Material (ACM): Means any material, object, product or debris that contains asbestos.

Asbestos Fibre: A particle of asbestos with a length to diameter ratio of greater than 3:1.

Asbestos Health Monitoring Register is a protected database containing information on employees' previous and current exposure to asbestos and any related health monitoring records or reports. It is only accessible to HSE Culture and Health on a restricted and password protected drive.

Asbestos Removal Control Plan (ARCP): A site specific document to be prepared by the removal contractor based on the information in the Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC:2002(2005)], outlining PPE requirements, barriers, signage, removal methodology, project timing and staging etc.

Asbestos Removalist: Means a competent person who performs asbestos removal work.

Asbestos Removal Work: Means the removal of ACM.

Asbestos Waste: Means all removed ACM and disposable items used during the asbestos work, such as plastic sheeting used to cover surfaces in the asbestos work area, disposable coveralls, disposable respirators, rags used for cleaning.

Asbestos Work Area: Means the immediate area in which work on ACM is taking place. The boundaries of the work area must be determined by a risk assessment.

Bonded (Asbestos): Means asbestos containing material in which the asbestos is firmly bound into a firm matrix (i.e. cementitious or resinous matrix).

Clearance Inspection: Means an inspection, carried out by an Asbestos Assessor or competent person, to verify that an asbestos work area is safe to be returned to normal use after work involving the disturbance of ACM has taken place. A clearance inspection must include a visual inspection and may also include clearance monitoring and/or settled dust sampling.

Clearance Monitoring: Means air monitoring using static or positional samples to measure the level of airborne asbestos fibres in an area following work on ACM. An area is 'cleared' when the level of airborne asbestos fibres is measured as being below 0.01 fibres/mL.

Competent Person: Means a person who has acquired through training, qualification or experience the knowledge and skills to carry out the task.

Control Monitoring: Means air monitoring using static or positional to measure the level of airborne asbestos fibres in an area during work on ACM. Control monitoring is designed to assist in assessing the effectiveness of control measures.

EQL: Energy Queensland

Friable (Asbestos): Means asbestos-containing material which, when dry, is or may become crumbled, pulverised or reduced to powder by hand pressure.

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Health Monitoring: of a person, means monitoring the person to identify changes in the person's health status because of exposure to particular substances. Health monitoring includes biological monitoring and medical assessments but does not include atmospheric monitoring.

HEPA Vacuum Cleaner: Means a vacuum cleaner that is fitted with a High Efficiency Particulate Air (HEPA) Filter which complies with *AS4260-1997 High efficiency particulate air (HEPA) filters – Classification, construction and performance*. A domestic vacuum cleaner is not suitable for use with asbestos.

HSE: Refers to the organisational structure and positions and/or the management and governance associated with Health, Safety, Environment and Cultural Heritage.

Membrane Filter Method (MFM): Means the technique outlined in the *Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition* [NOHSC:3003(2005)].

NATA National Association of Testing Authorities, Australia.

National Exposure Standard (NES): Means an airborne concentration of a particular substance, within the worker's breathing zone, which according to current knowledge, should not cause adverse health effects or undue discomfort to nearly all workers.

Non-Friable Asbestos: Means material containing asbestos that is not friable asbestos, including material containing asbestos fibres reinforced with a bonding compound.

Occupational Hygienist: A qualified and/or experienced person with tertiary qualifications in a science or occupational health related field. To work within the asbestos industry, Occupational Hygienists should be NATA Accredited, and must be experienced in the assessment and control of asbestos, and other chemical, physical or biological hazards in the workplace.

PC: Means the appointed Principal Contractor or Project Manager of the project. This person is responsible for the co-ordination and management of all sub-contractors.

PCBU: Person conducting a business or undertaking.

Permit to Work (PTW): A formal written authority to operate a planned procedure, which is designed to protect personnel working in hazardous areas or activities. Authority for a safe system of work.

Personal Protective Equipment (PPE): Means equipment and clothing that is used or worn by an individual person to protect themselves against, or minimise their exposure to, workplace risks. It includes items such as facemasks and respirators, coveralls, goggles, helmets, gloves and footwear.

PLM: Polarised Light Microscopy

QR: Quick Response Code

Risk: Means the likelihood of a hazard causing harm to a person. Note: *In this Asbestos Management Plan, risk relates to illness or disease arising from exposure to Airborne Asbestos Fibres.*

SEM: Scanning Electron Microscopy

Structure: Means any construction, whether temporary or permanent. Note: A structure includes a bridge, erection, edifice, wall, chimney, fence, earth works, and reclamation, ship, floating structure or tunnel. Refer to the Workplace Health and Safety Act 1995 for a comprehensive definition.

SWMS: Safe Work Method Statement

WOB: Whole of Business

Workplace: Is any place where work is, or is to be, performed by a worker; or a person conducting a business or undertaking.

4. REFERENCES

- F214 Asbestos Exposure Questionnaire (Form)
 R073 HSE and Asset Incident Management Framework (Reference)
 R142 Contractor Asbestos Related work or Asbestos Removal Work Reference Guide (For Work on Energy Queensland Facilities) (Reference)
 R244 Health Monitoring (Reference)
 S045 Waste Management and Resource Recovery Plan (Standard)
 ES000904W101 Management of Disposal of Regulated Waste (Work Instruction (Manual))
 AS 1319-1994 Safety Signs for the occupational environment
 AS 4260 -1997 High efficiency particulate air (HEPA) filters – Classification, construction and performance
 Guidance Note on the Interpretation of Exposure Standards for Atmospheric contaminants in the Occupational Environment 3rd Edition [NOHSC:3008 (1995)]
 Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition [NOHSC:3003 (2005)]
 Qld Code of Practice for How to Manage and Control Asbestos in the Workplace
 Qld Code of Practice for How to Safely Remove Asbestos
 Queensland *Environmental Protection Act 1994*
 Queensland *Environmental Protection (Waste Management) Regulation 2000*
 Queensland *Work Health and Safety Regulation 2011*

5. ROLES AND RESPONSIBILITIES

Role	Responsibility
General Manager HSE	<ul style="list-style-type: none"> ○ Approve this AMP; ○ The implementation of the AMP is monitored to ensure that working arrangements and provision of financial, technical, human and other resources are suitable and sufficient to meet its requirement; ○ Establishing and maintaining communication pathways with management, workers and external stakeholders including Trade Unions; ○ Information and data is managed transparently and regularly reviewed; ○ Compliance with Chapter 8 of the Queensland <i>Work Health and Safety Regulation 2011</i> and the two Codes of Practice relevant to Asbestos are understood and followed; ○ Adequate resources are provided and allocated to carry out the AMP; ○ The necessary requirements for the safe management of ACMs are fully identified and incorporated into any design or specification; ○ The implementation of the AMP is monitored to ensure that working arrangements and provision of financial, technical, human and other resources are suitable and sufficient to meet its requirement; ○ Performance KPIs are established and monitored for the Asbestos Manager position; and ○ The Asbestos Manager is provided with sufficient support.

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Role	Responsibility
Asbestos Manager	<ul style="list-style-type: none"> ○ Manage the WOB Prioritised Removal Plan ○ Developing and implementing asbestos processes, procedures and SWMS; ○ A training program is delivered across the organisation; ○ Compliance requirements are thoroughly understood and addressed in the AMP; ○ Ensuring that ACMs are identified in all assets, and subsequently assessed and regularly audited by a competent person, including updating of the Asbestos Registers; ○ Monitoring Asbestos Contractors to assess their compliance with statutory requirements, reporting and discussing deficiencies with the Contracts group; ○ Notifying the GM HSE and relevant safety personnel of asbestos related incidents; ○ The site asbestos registers and AMP are reviewed periodically, and risk assessments are current; ○ Management actions are assessed and reviewed in terms of their effectiveness considering audit findings, changes in Regulations, and/or advances in industry 'Best Practice'; ○ Specification for asbestos removal, abatement, and remedial works are prepared and standardised across all departments; ○ A panel of approved asbestos removal contractors is established under a specific and detailed tender brief; ○ Conduct monitoring and review activities on all aspects of the management of ACM and the removal of ACM. ○ Providing expert advice on ACMs and their treatment to those with responsibility under this AMP; and ○ Maintain regular dialogue with relevant personnel and stakeholders internally as well as externally.
Managers, Project Managers, Contractor and Design Teams	<p>Areas are assessed for ACMs at the feasibility stage of a project:</p> <ul style="list-style-type: none"> ○ Follow the Operational Safe Systems of Work for asbestos management, including Notification, Permit-to-Work and Clearance Procedures; ○ Staff and contractors are informed of the location of any known ACMs affecting the project; ○ Works are halted if suspect ACMs are discovered during work and further advice is sought from the Asbestos Manager; ○ The initial responsibility lies with the Design Team; this passes to the Project Manager once appointed; ○ Appropriate records of asbestos works are properly kept; ○ The Asbestos Register is maintained during site works; ○ Arrangements are made so that employees have the necessary facilities, training and allied competencies to discharge the duties assigned to them under the AMP; and ○ Emergency procedures are established.

Role	Responsibility
<p>EQL Representatives who engage Asbestos Removal Contractors and Contractors conducting asbestos related work</p>	<p>Energy Queensland representative engaging contractors from the panel will also be responsible for the following:</p> <ul style="list-style-type: none"> ○ Complete the required asbestos management training provided; ○ Where ACMs are to be removed, a licensed removalist is engaged from the Asbestos Removal Preferred Contractor Panel, relevant documentation is completed e.g. Notification, Permit to Work, Clearances, Asbestos Removal Plan or SWMS. ○ Organise for an Independent licensed asbestos assessor to conduct a clearance inspection of the asbestos removal area to ensure that the area is safe for normal use when a licensed removalist is engaged; ○ Organise for a competent person to conduct a clearance inspection of the asbestos-related work area to ensure that the area is safe for normal use if the work is not Class A or B removal work; ○ Organise for an Independent licensed asbestos assessor to conduct air-monitoring of the asbestos removal area to ensure that the area is safe for normal use when a licensed removalist is engaged, and air monitoring is deemed as a requirement; ○ Assessing asbestos contractors, quotations, work plans and recommending selection where applicable; ○ Ensuring site works comply with relevant permit-to-work processes; and ○ Notifying the Asbestos Manager and relevant safety personnel of asbestos related incidents.
<p>All Employees, Contractors and Visitors</p>	<ul style="list-style-type: none"> ○ Informing the Asbestos Manager of the presence of any previously unknown asbestos hazard or a suspected asbestos hazard on site. This may require reference to the on-site asbestos register; ○ Ensuring that you are clean shaven when required to wear either a half face or full-face respirator. ○ Complying with the AMP to ensure yourself, other staff, contractors or visitors are not at risk of exposure to airborne asbestos fibres; ○ Ensuring any contractors that work on Energy Queensland facilities involving asbestos is conducted under using the EQL Guidelines; ○ Ensure Energy Queensland staff that are carrying out asbestos related work, that the work is conducted in accordance with the relevant Safe Work Method Statements (SWMS) pertaining to the asbestos related task; and ○ Participate in health monitoring where suspected exposure to asbestos has occurred or is likely to occur.

6. PRINCIPLES OF ASBESTOS MANAGEMENT

6.1. General Principles

- The ultimate goal is for all workplaces and residences to be free of ACM. Accordingly, Energy Queensland has implemented a Prioritised Removal Program with the aim of being asbestos free by 2030;
- Where applicable, Energy Queensland will not enter into or renew any new leases of buildings or facilities that contain ACM until the lessor has removed it and an updated asbestos register indicating the site is asbestos free;
- As part of the Prioritised Removal Program EQL has prioritised sites for removal into the following categories:
 - **Priority 1** sites are company owned residences that contain asbestos and identified high risk sites;
 - **Priority 2** sites are depots and offices;
 - **Priority 3** sites are substations, power stations, communication sites, etc.

- Reasonable steps have been taken to label all identified ACM at Energy Queensland sites and assets. Where ACM's are identified or presumed, the locations must be recorded in the site asbestos register;
- Risk assessments of all identified or presumed ACM in Energy Queensland's used in the construction of facilities must be conducted and risk rated;
- Control measures shall be established to prevent exposure to airborne asbestos fibres and have considered the results of risk assessments conducted for the identified or presumed ACM;
- When ACM's are identified or presumed, full consultation, involvement and information sharing shall occur with impacted stakeholders during each step of the development of the site-specific AMP i.e. during the identification, risk assessment and establishment of control measures;
- The identification of ACM and associated risk assessments must be undertaken by competent persons; and
- All workers and contractors on premises where ACM are present or presumed to be present, and all other persons who may be exposed to ACM as a result of being on the premises, should have access to information on the health and safety consequences of exposure to asbestos and appropriate control measures.

6.1.1 Removal

Removal of ACM must be performed under specified controlled conditions, depending on the type of ACM to be removed.

Removal is considered preferable to the other abatement options such as enclosure or encapsulation, as it eliminates the hazard from the workplace.

7. ASBESTOS REGISTERS AND ASBESTOS DATABASES

Energy Queensland has an asbestos portal/database for managing ACM in its properties and assets. The asbestos database records the date of inspection, location, position, type of ACM and its condition identified during a survey. The database includes a qualitative risk assessment. Each asbestos situation identified is given a risk rating and recommended control measure based on the extent, type, condition and accessibility of the asbestos at the time of the survey. Where applicable, laboratory analysis certificates, air monitoring certificates, photographs, drawings and details of asbestos removal can be attached to the database and form part of the asbestos register for each individual property or asset.

The Asbestos Portal can be found via the Wire under Asbestos Management. Site specific plans and registers are available via QR codes at each site.

Energy Queensland has a prioritised audit management process in place to review asbestos registers for each property. As part of the initial audit risk assessment are conducted of each ACM with the site having a risk rating of extreme, high or moderate. The risk assessment indicates the need for reassessment or if any of the ACM identified have been disturbed, damaged, deteriorated or removed. Visual inspection of any identified ACM will be undertaken during reaudits.

To align with this requirement, the Energy Queensland asbestos portal/database allows for each assessment of any ACM identified to be archived when a reassessment is conducted. This allows for the assessments for each ACM to be 'tracked' over the period of its life until it is removed from the site or asset. The asbestos database allows for either:

1. The generation of an asbestos report containing only the current (i.e. latest) assessment details;
or
2. All of the preceding assessments relating to the ACM for auditing and tracking requirements.

The asbestos portal/database is currently administered by the HSE team. The Asbestos Manager is responsible for the development and auditing of the asbestos portal/database in accordance with current legislation.

All employees, contractors and others at the workplace must be informed about the location of each asbestos register within the premises. Prior to the commencement of any work that may disturb ACM, the asbestos register must be made available for review by:

- Employees, contractors and their representatives;
- Any other employers within the premises;
- Any person removing ACM;
- Any person engaged to perform work that may disturb ACM, including any presumed (suspect) ACM; and
- Any other person who might be exposed to airborne asbestos fibres.

Please refer to [Section 9. Asbestos Removal and Remediation](#) for further information relating to asbestos remediation works.

7.1. Asbestos Survey Approach

Energy Queensland properties built before 31 December 2003 are audited for ACM as part of the asbestos survey programme. All asbestos survey information will be incorporated into the Energy Queensland electronic asbestos portal/database, which can generate an asbestos register for each property. A copy of the current asbestos register can be viewed via the site QR code.

Each asbestos survey will be completed by performing a visual assessment of the building or structure identified as requiring an audit. Such assessments will only be performed by persons/organisations that hold as a minimum an Asbestos Assessor licence. All visible and accessible sources of asbestos identified are documented in accordance with the Energy Queensland asbestos portal/database format to allow the asbestos registers to be generated. Those areas not able to be accessed during the course of the site assessment are also documented.

Representative samples of materials suspected of containing asbestos should be collected during the initial audit. The samples will be adequately labelled to clearly identify its location, along with the date of sampling and a unique identification number and use a “chain of custody” system to ensure integrity of the sample.

Analysis of these samples will be by Polarised Light Microscopy (PLM), supplemented with dispersion staining techniques and is only conducted by a NATA accredited laboratory. Other analytical techniques, such as scanning electron microscopy (SEM), may be required where PLM does not provide a definitive result.

All survey data plus supporting documentation (sample analysis certificates, a photographic record of high-risk situations and plans where applicable) will be entered into the asbestos database.

Energy Queensland have implemented a rigorous inspection/assessment approach required by legislation in that the business audits:

- high risk sites annually,
- medium (6) risk sites every 3 years; and
- medium (5) risk sites every 5 years.

7.2. Presuming That Materials Contain Asbestos

Energy Queensland aims to undertake representative sampling wherever practicable however, in certain circumstances, the person conducting audits may presume the material contains asbestos.

In some locations it may not be possible for suspect material to be sampled due to inaccessibility or risk of injury to the assessor by taking a sample (i.e. risk of electrocution when inspecting live equipment). In these circumstances, it will be necessary to presume that ACM is present in these

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areas or within the materials that form part of the electrical installations. Once this presumption is made, the material must be treated as ACM and all work practices and procedures apply as positively identified ACM. This protocol must remain until the material is removed or sampling confirms that it does not contain asbestos.

Any materials presumed to contain asbestos identified within Energy Queensland's assets will be recorded on the asbestos registers as a 'suspect' material.

7.3. Risk Assessment

The asbestos risk assessment process identifies, evaluates, controls and monitors sources of asbestos within buildings, other structures and equipment.

It is necessary to differentiate between 'asbestos hazard' and 'asbestos risk'. 'Hazard' indicates potential for harm, while 'risk' refers to the probability of that harm becoming a reality. For example, the presence of asbestos in a building is a hazard, but while that asbestos remains in sound condition and does not release fibres into the air, the risk is negligible. A health risk exists only when the asbestos fibres are airborne and can be inhaled.

A qualitative risk assessment is undertaken each time an asbestos survey of Energy Queensland buildings or structures is conducted. Energy Queensland has adopted the following risk assessment system for each asbestos situation identified within the building or structure. Each situation is allocated either an 'Extreme', 'High' or 'Medium' risk rating. These ratings are defined as follows:

Extreme: ACM is in poor or significantly deteriorated condition and elevated levels of respirable airborne fibre are probable with minimal disturbance. The ACM is readily accessible, prone to further disturbance and poses an immediate health risk to personnel. The area should be isolated immediately, and removal or repair required as soon as practicable.

High: ACM shows moderate signs of deterioration and is unsealed. Elevated levels of respirable airborne fibres are possible and further disturbance due to routine building activity and/or maintenance is likely.

Medium 6: ACM shows minor signs of deterioration and is unsealed. Low levels of respirable asbestos fibres are possible and further disturbance due to routine building activity and/or maintenance is likely.

Medium 5: ACM shows very minor or no signs of damage/deterioration. Routine accessibility is unlikely to cause significant deterioration, or the ACM is adequately sealed managing the Asbestos Hazard.

7.4. General

The Board and CE have approved the Asbestos Management Policy Management of in situ ACM requires monitoring of the condition of the materials, so they do not deteriorate to such an extent that Energy Queensland employees, contractors, visitors or members of the public are unnecessarily exposed to airborne asbestos fibres.

Energy Queensland also requires contractors working with ACM to implement a safe system of work, including site inductions, SWMS and PTW systems. These requirements are included in contracts covering construction and maintenance works.

7.5. Reinspections

Resurveys of ACM remaining within Energy Queensland properties will only be conducted by qualified Asbestos Assessors or competent persons. Such resurveys will comprise a risk assessment of the condition of the ACM to determine whether the material remains in a satisfactory condition, or if deterioration has occurred since the previous inspection.

Generally, re-sampling of ACM will not be required during these reinspection's. If previously unidentified or undocumented suspect ACM is encountered during the resurvey process, sampling

and analysis will need to be performed by the Asbestos Assessor. The asbestos register will be updated and issued on the completion of the reinspection work.

7.6. Record Keeping

Energy Queensland will maintain detailed records of all activities relating to asbestos works which have been undertaken on Energy Queensland premises in line with all current legislation and Codes of Practice. The records kept will include:

- Copies of all asbestos audit reports, including updates and amendments (available from the Asbestos Registers);
- Induction records for contractors about the presence of ACM on site and appropriate training in safe work procedures and practices;
- Training records for Energy Queensland employees about the presence of ACM on site and appropriate training in safe work procedures and practices;
- Records of any asbestos remediation works performed on Energy Queensland sites;
- Clearance certificates indicating areas are safe for occupation after asbestos remediation works; and
- Asbestos air monitoring results.

7.7. Signs and Labels

The use of warning signs and labels to indicate the presence of ACM is one of many recognised management controls. Such systems are designed to alert personnel to the presence of asbestos, thereby reducing the risk of inadvertent damage to the ACM (which may cause the release of asbestos fibres into the airborne environment).

7.7.1 Warning Signs

A warning sign will be positioned in a prominent place so it can be easily viewed within each building or facility (i.e. on the front door, within the entrance lobby, at a reception desk or in the area where contractors report prior to commencing any building or maintenance works) that was constructed prior to 31 December 2003. In Energy Queensland domestic premises, the sign may be located in the meter box.

Any areas of a workplace which contain ACM, including plant, equipment and components, should be signposted with warning signs to adequately ensure that the asbestos is not unknowingly disturbed without the correct precautions being taken.

These signs should be placed at all of the main entrances to the work areas where asbestos is present.

Energy Queensland has completed a process to identify, label and record switchboards that may contain asbestos in over 700 000 regional customers' premises (this activity has not been undertaken in the South East region), the labelling of these switchboards is another control measure for Energy Queensland workers, electrical contractors and members of the public to mitigate the risk of inhaling asbestos fibres. As part of the EQL asbestos training and relevant Safe Work Method Statement, workers who identify asbestos in customer switchboards are to place a warning label on the suspected ACM.

An example of warning signs is shown below:



7.7.2 Labels

Labels should be placed as close to the ACM location recorded in the ACM register. The location and number of labels should be determined by a competent person.

Examples of labels are shown below:



This label is used in Energy Queensland facilities and equipment.



This label is used in customer owned switchboards that may contain asbestos.



This type of label can be found on HEPA Vacuums and PAPER's.



These signs and QR codes can be found on all sites build prior to 31 December 2003.

Where a risk assessment suggests an ACM might be disturbed or persons might be exposed and it is not practical to label the ACM (e.g. floor tiles or a friable ACM such as lagging), a prominent warning sign, specifying the ACM, shall be posted in its immediate vicinity if it is reasonable practicable.

8. TRAINING

Energy Queensland is committed to providing information and training to workers and contractors that may be involved in asbestos related work, depending on the circumstances.

The level of training required will be dependent upon the tasks performed by the individual (i.e. a field employee who regularly works with asbestos contained in electrical switchboards will undergo a much higher level of asbestos awareness and training than an office-based administration officer).

All training undertaken by Energy Queensland employees shall be recorded on the individual's training records and any necessary refresher training is flagged when required.

Training videos are available on the Asbestos SharePoint site demonstrating SWMS, ARCP's and the use of various equipment.

Energy Queensland provides asbestos awareness and training packages throughout the business. These are outlined below:

Mandatory Training to be Implemented	Target Audience
Asbestos Awareness TO747	All Employees and Contractors.
Working Safely with Asbestos Containing Materials TO495	All Field Staff, Technical Service Persons, Power Workers, Line Managers, Apprentices, nominated WHSR, Apprenticeship Trainers, Health & Safety Business Partners, T&D Trainers and any further staff identified that may be required to conduct asbestos related work.

8.1. Equipment

8.1.1 HEPA Vacuum Cleaner and PAPR Annual Inspections

It is a requirement to register HEPA Vacuum Cleaners and PAPR Pumps on the AMPRO System so that they can be flagged for its 12-monthly tests and inspection. This consists of an inspection of

filters for damage, air tightness of the machine, proper function of the control mechanism and testing of the efficiency of the filters. For more information, go to the [Asbestos Management SharePoint](#) site.

9. CONTRACTOR SAFE WORK PRACTICES

9.1. General

Prior to commencing any works on Energy Queensland premises or networks, such as demolition, refurbishment or maintenance, or conducting asbestos related work on Energy Queensland's behalf, the asbestos register for the particular property or asset and this document must be consulted to determine if any ACM's are present. If it is documented that ACM's are present in the area and may be impacted upon by the proposed works, an assessment must be conducted by the person who commissioned the work whether there is a requirement for the ACM to be removed by a licensed asbestos removalist, prior to the commencement of any building or maintenance works and the process outlined in [R142. Contractor Asbestos Related work or Asbestos Removal Work Reference Guide \(For Work on Energy Queensland Facilities\) \(Reference\)](#) is to be followed.

If unknown materials, or undocumented materials suspected of containing asbestos are encountered during maintenance works, on EQL Buildings such materials are to be treated as if they contain asbestos and any work that would impact on that material must immediately cease, pending sampling and analysis by a qualified, competent person. This will allow Energy Queensland to determine what control measures are required, prior to works recommencing.

When working on the network, for example civil works when working on underground services or replacing meters, contractors must have a safe system of work including SWMS's for the disturbance of or remove of ACM's that may be encountered.

9.2. Site Induction and EQL Training

Any external contractor engaged by Energy Queensland to perform works on or in a property or asset must, prior to commencing work, undergo an Energy Queensland Generic Contractor Induction, Asbestos Awareness course as well as individual site inductions. This induction includes alerting the contractor to the possible presence of asbestos and the various issues associated with working with ACM. The asbestos register shall be reviewed by the contractor during the site induction and it will be determined if any ACM are at risk of being disturbed as a result of the intended works. If this is the case, the contractor engaged to perform work on site will be required to read and comply with this AMP and the Energy Queensland Permit to Work system. Individuals must also be aware of their legal obligations in relation to health and safety specified in the *Queensland Work Health and Safe Regulation 2011*.

9.3. Permit to Work

The Asbestos Permit to Work (PTW) system is designed to ensure appropriate work practices are employed in the vicinity of ACM.

The Asbestos PTW system will document what, where and how ACM is to be removed, encapsulated or otherwise protected or removed prior to the contracted maintenance or building/removal works proceeding.

When the work is completed, the permit will be signed and returned to the Energy Queensland person who commissioned the work who will cancel it after ensuring that a clearance certificate is provided. Energy Queensland will retain copies of all Asbestos Removal Control Plans, JSEAs/Risk Assessments and SWMSs on the asbestos database and the site asbestos register will be updated to reflect the work conducted.

9.4. Contractors Conducting Asbestos Related Work or Removing 10sqm or Less of ACM on Energy Queensland's Behalf

Contractors conducting asbestos related work, including working on switchboards containing asbestos must have been trained in the EQL Asbestos Awareness course (TO747) and the relevant

SWMS relating to the work being conducted. All equipment including RPE and HEPA asbestos vacuum cleaners are to meet the requirements of the relevant Work Health and Safety Regulation 2011, Code of Practice, Australian Standard and Manufacturers Manual in regards to maintenance, inspection, testing and storage of that equipment.

Contractors must have developed SWMS for the Asbestos Related Work that they are performing and must be clean shaven when required to use either a half face or full face respirators.

10. ASBESTOS REMOVAL AND REMEDIATION

10.1. General

It must be noted that only licenced, trained, or competent Energy Queensland staff or contractors are permitted to work with or remove bonded and friable ACM in accordance with approved SWMS's and ARCP's. It is important to stress that these SWMSs relate only to bonded ACM and are restricted to the removal of **10m² or less** of bonded ACM. Both Ergon and Energex have applied for and been granted by WHS Qld Exemptions to work on and remove friable asbestos items from the networks, for example friable Silva Link Fuses, removal of HRC Fuses, removal of friable asbestos wrapping from "Potheads", and removal of friable asbestos items located within HV Plant. For any other works involving ACM outside the scope of an approved SWMS or ARCP, Energy Queensland will only engage licensed "A" Class asbestos removalists from the approved EQL Asbestos Removal Preferred Contractor Panel PCP112 to conduct these works. A detailed site-specific work scope and Asbestos Removal Control Plan (ARCP) will be developed prior to the removal of more than **10m²** ACM or any amount of friable asbestos from any Energy Queensland properties or assets. The removal of ACM shall only be performed by a reputable, specialised asbestos removalist who must:

- Hold a valid 'A' Class Asbestos Removal Business Certificate to perform asbestos removal work issued by Workplace Health and Safety Queensland. This certificate allows the contractor to remove friable ACM or any quantity of bonded ACM.

The Contractor shall ensure that a 'competent person' directly supervises all aspects of the asbestos removal work and is present at the asbestos removal site at all times when asbestos removal and decontamination work is in progress in line with the requires of the Qld *WHS Regulation 2011*.

Proof of the qualifications of the Asbestos Removalist and the 'competent person' must be kept on site at all times any asbestos removal and decontamination work is being performed.

10.2. Asbestos Remediation

ACM remediation works (bonded or friable) on Energy Queensland sites shall be undertaken in accordance with the Queensland *Work Health and Safety Regulation 2011* and the *How to Safety Remove Asbestos Qld Code of Practice 2011*.

10.3. Disposal of Asbestos

Energy Queensland have documented "Agents Agreements" with suitable qualified and certified contractors to remove, transport and dispose of asbestos waste. These agreements are in accordance with the provisions under s35 of the *Environmental Protection (Waste Management) Regulation 2000*. Copies of the completed Waste Transport Certificates shall be sent to the Asbestos Manager.

The disposal of removed ACM and all associated waste, including contaminated disposable PPE will be the responsibility of the contractor engaged by Energy Queensland to perform any asbestos related works. The disposal of all asbestos waste off site will be in accordance with the *How to Safety Remove Asbestos Qld Code of Practice 2011*, local authority and legislative requirements.

All asbestos waste, including contaminated disposable PPE shall be double bagged prior to its removal from site, using 200µm thick polyethylene bags. Asbestos waste shall be bagged once at the workface and double bagged away from the workface but prior to leaving the removal area or

enclosure. Bags should be filled to no more than 50 per cent capacity, and contents should be wet before sealing.

Consistent with good manual handling practice, bags should not exceed 16 kg in weight.

Alternatively, other approved containers may be used. In the case of non-friable materials such as asbestos cement, such materials can be placed into a plastic lined industrial waste bin or like container.

Each bag or container shall be labelled on its outermost surface, with the following warning statement or a similar statement to alert people to the asbestos hazard:

CAUTION – ASBESTOS WASTE
DO NOT DAMAGE OR OPEN BAG
DO NOT INHALE DUST
CANCER AND LUNG DISEASE HAZARD

Transport and final disposal of asbestos waste material shall be carried out in a manner that complies with all legislative requirements, including methods that will prevent asbestos dust being released into the atmosphere (i.e. through puncturing of the bags). All asbestos waste material shall be disposed of at an approved landfill site and in a manner that complies with all legislative requirements, including but not limited to the Queensland *Environmental Protection Act 1994* and Queensland *Environmental Protection (Waste Management) Regulation 2000*. Prior to payment of invoices, Energy Queensland must receive copies of waste disposal receipts, as provided by the approved landfills. Waste disposal receipts should be attached to the relevant Asbestos register as evidence of removal until such time as the register is updated to reflect the current state. .

10.4. Disposal of Asbestos Waste by Energy Queensland Employees

Energy Queensland staff trained and competent to conduct works involving ACM as per the approved SWMS's or ARCP's will generate small quantities of asbestos waste. All procedures are specified within the individual SWMS's and ARCP's regarding the disposal of asbestos waste must be followed.

All waste will be sealed (double bagged/wrapped) in at least 200µm thick polyethylene bags and appropriately labelled as stated above. Energy Queensland provide two options for the disposal of asbestos waste, which are used dependent on the amount of waste generated and the location of the works. The asbestos waste can be disposed of using either of the two options detailed below

- **Option 1** - Disposal at a Local Authority Waste Disposal site that accepts asbestos waste; or
- **Option 2** - On return to the local Energy Queensland Depot, sealed asbestos waste will be placed directly into designated asbestos waste disposal bins (this is for smaller quantities of asbestos waste only).

The existing Energy Queensland procedure detailing the requirements for the disposal of regulated and trackable waste is specified within [ES000904W101. Management of Disposal of Regulated Waste Work Instruction \(Manual\)](#) and [S045. Waste Management and Resource Recovery Plan \(Standard\)](#). Energy Queensland environmental staff may be contacted regarding waste tracking of Asbestos waste.

10.5. Project Supervision

All works carried out by asbestos removalists engaged by Energy Queensland will be supervised and monitored by the identified Energy Queensland personnel or their representative (i.e. Occupational Hygienist).

Prior to the removal of any friable asbestos, an appropriately qualified person with experience in asbestos related works shall be engaged to work independently of the asbestos removalist. The appropriately qualified person will be responsible for ensuring the asbestos removalist achieves a

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satisfactory level of workmanship and complies fully with statutory requirements and the requirements of the technical specification. Depending on the nature of the work, Energy Queensland may also engage this appropriately qualified person to oversee the removal of certain bonded asbestos materials.

Commensurate with the above requirements, the specific duties of the supervising, appropriately qualified person may include:

- Inspection of the integrity of the containment prior to commencement of asbestos removal works;
- Inspection of the asbestos removalist's equipment, including decontamination and negative air units, water filtration systems, vacuum equipment, personal protective equipment (PPE) etc;
- Assessment of the asbestos removalist's work methods, use and maintenance of PPE and decontamination procedures;
- Clearance visual inspection of the work area after the removal of asbestos to verify the asbestos has been removed to a satisfactory standard; and
- Asbestos fibre air monitoring in accordance with the Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition [NOHSC:3003(2005)], during asbestos removal works and as clearance air monitoring after the removal of asbestos, but before dismantling of the containment.

11. ASBESTOS EMERGENCY RESPONSE PROCEDURES

Asbestos response procedures may be required to be followed where existing ACM have been inadvertently disturbed. Where such damage has occurred, the relevant line manager and/or HSE team member shall be notified immediately.

It must be noted that these procedures do not directly apply to Energy Queensland staff working with ACM where the risk has been assessed and the operative is trained and competent in the use of the SWMSs.

Energy Queensland uses [R073. HSE & Asset Incident Management Framework \(Reference\)](#) to record and categorise all incidents using a single system. All incidents are recorded, categorised and notified to relevant positions in a timely and efficient manner, any incidents involving ACM and the possible exposure to airborne asbestos fibres shall be reported into SAP.

12. HEALTH MONITORING

Energy Queensland has a duty to provide health monitoring to workers who are engaged in processes and work practices that may expose them to asbestos.

Energy Queensland has established health monitoring processes, [R244. Health Monitoring \(Reference\)](#), to manage employees who believe they have been exposed to asbestos as a result of their work practices. Health monitoring is managed by the HSE Health & Wellness team.

Employees who believe they have been exposed to asbestos while performing work are invited to complete [F214. Asbestos Exposure Questionnaire \(Form\)](#). This questionnaire will be assessed by an Occupational Physician to determine whether health monitoring is recommended.

Energy Queensland maintains and stores all health monitoring records in a confidential Asbestos Health Monitoring Register.

13. REVIEW OF THE ASBESTOS MANAGEMENT PLAN

The Energy Queensland AMP will be reviewed in accordance with paragraph 430 of the Queensland *Work Health and Safety Regulation 2011*. This will include a review process at least bi-annually or sooner if required, due to amendments in legislation or changes to internal processes and procedures within Energy Queensland or a Health and Safety Representative requests a review.

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These reviews will critically assess all asbestos management processes and safe work methods and their effectiveness in:

- preventing exposure to airborne asbestos fibres;
- controlling of maintenance workers and contractors;
- highlighting the need for action to maintain or remove ACM;
- raising awareness and the provision of training among all workers; and
- maintaining the accuracy of the asbestos database and associated registers.