## Contents

1. Background.........................................................................................................................2
2. Abbreviations ......................................................................................................................2
3. Definitions ............................................................................................................................2
4. Asbestos Management .........................................................................................................3
5. Asbestos Removal Work .......................................................................................................10
6. Responsibility for Implementation .......................................................................................14
7. Records ................................................................................................................................15
8. Document History ................................................................................................................16

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Monash University Procedure

<table>
<thead>
<tr>
<th>Procedure Title</th>
<th>OHS Asbestos Management Procedure</th>
</tr>
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<tbody>
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**Scope**

This procedure applies to all staff, students, contractors and visitors within Monash University owned or controlled assets and other occupied properties within Australia.

**Purpose**

The purpose of this document is to provide an overarching framework for the effective management of Occupational Health and Safety associated with asbestos containing materials (ACMs) at Monash University.

This procedure documents the processes Monash University will follow to ensure compliance with the legislation and to eliminate or minimise the risks that asbestos may pose to its staff, students, contractors and visitors.
1. **Background**

As with many buildings built in Australia between 1960 and 1990, asbestos containing materials were installed into many of the buildings owned and controlled by Monash University. ACMs were also installed into many items of plant and equipment that were purchased and installed at Monash University during this time.

While significant amounts of asbestos have been removed from Monash University owned buildings, there are still many areas where asbestos containing materials remain in situ.

Monash University has a legislative responsibility to manage asbestos in accordance with the Occupational Health and Safety Act 2004 (VIC) and the Occupational Health and Safety Regulations 2017 (VIC).

2. **Abbreviations**

- **ACD**: Asbestos Contaminated Dust or Debris
- **ACM**: Asbestos Containing Material
- **OH&S**: Monash Occupational Health & Safety
- **OHS**: Occupational Health and Safety
- **SARAH**: Safety and Risk Analysis Hub

3. **Definitions**

A comprehensive list of definitions is provided in the Definitions Tool. Definitions specific to this procedure are as follows.

**ACM Incident**: An event involving the disturbance of ACMs that has potential to cause significant risk associated with exposure to asbestos fibres.

**Asbestiform**: Fibres that are of high tensile strength, flexible, long, and thin crystals that readily separate. Asbestiform fibres fall within specific length and width parameters and length:width ratio.

**Asbestos**: The asbestiform varieties of mineral silicates belonging to the serpentine or amphibole groups of rock-forming minerals, including actinolite, or amosite (brown), anthophyllite, chrysotile (white), crocidolite (blue) and tremolite asbestos.

**Asbestos Containing Materials (ACM)**: Any manufactured material or object that as part of its design contains asbestos.

**Airborne Asbestos**: Asbestos fibres that typically have been released from the parent material and are suspended in the air. For assessment of risk to health, only airborne fibres of respirable size are assessed.

**Asbestos-Contaminated Dust Or Debris (ACD)**: Dust or debris that has settled within a workplace and is, or is assumed to be, contaminated with asbestos.

**Asbestos Removalist**: A person conducting a business or undertaking who is licenced to undertake asbestos removal work.

**Asbestos Removal Work**: The process of removing asbestos that is fixed or installed in a building, structure or plant to the point where it is no longer contained.

**Asbestos Waste**: Asbestos that has been removed and any disposable items used during asbestos removal work (such as plastic sheeting, disposable tools, used vacuum filters and disposable personal protective equipment).

**Contractor**: Any person or business engaged by Monash University who enters into a contractual arrangement to conduct work for Monash University, but whose primary employer is not Monash University.

**Control Limit**: 8 hour time weighted average respirable fibre level of 0.1 fibres/ml of air.
Friable Asbestos: ACM that is in a powder form or that can be crumbled, pulverised or reduced to a powder by hand pressure when dry.

N-Situ Asbestos: Asbestos or ACM fixed or installed in a structure, equipment or plant but does not include naturally occurring asbestos.

Nata-Accredited Laboratory: Testing laboratory accredited by the National Association of Testing Authorities (NATA) Australia, or recognised by NATA either solely or with someone else for the purpose for which they have been engaged.

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

Plant & Equipment: Any machinery, equipment, appliance, container, implement or tool, and includes any component or anything fitted or connected to any of those things.

Respirable Asbestos: Fibres that are more likely to reach the small airways and alveolar region of the lung due to having a length of more than five microns and an aspect ratio ratio (length/width) greater than 3:1.

A Class Removalist: An employer, or self-employed person, who is licenced to undertake the removal of:
  - any amount of friable asbestos or ACM
  - any amount of ACD

B Class Removalist: An employer, or self-employed person, who is licenced to undertake the removal of:
  - any amount of non-friable asbestos or ACM
  - ACD associated with the removal of non-friable asbestos or ACM

4. Asbestos Management

4.1. Identification of Asbestos

Where it is reasonably practical, Monash University must identify all asbestos present within its owned and controlled properties (where Monash University leases properties, the landlord must provide Monash University with a report or a register that identifies any asbestos present within the Monash University occupied buildings prior to occupation).

4.2. Asbestos Audit

OH&S will ensure that an asbestos audit (also known as a Division 5 audit) is conducted every 5 years as a minimum that will:
  - Identify asbestos, where it is contained in material that is fixed or installed in buildings, plant or asbestos contaminated soil or dust;
  - Where there is uncertainty as to the presence of asbestos (as a result of areas being inaccessible at the time) assume that asbestos is present or arrange for analysis of a sample to be taken; and
  - Where asbestos has been identified determine:
    - The location of the asbestos;
    - The type of asbestos containing material;
    - Whether the material is friable or non-friable;
    - The condition of the material;
    - The likelihood for the material to sustain damage or deterioration; and
    - Any activities likely to be carried out that could damage or disturb the asbestos.
4.3. Asbestos Audit Specific to Demolition and Refurbishment

Where a Contractor Responsible Person (CRP) from Monash University (as defined in the Contractor Management Procedure) commissions or carries out demolition or refurbishment work on a building or plant where asbestos is fixed or installed, the CRP and the Contractor engaged will:

- Review the Asbestos Register
- Ensure a comprehensive audit of the building or plant is undertaken with regard to those areas likely to be affected by the works and not previously audited (Division 6 audit);
- Forward the report to OH&S to update the asbestos register; and
- Ensure ongoing assessment of areas that were previously inaccessible but will be impacted by the proposed works.

The CRP must provide the Asbestos Register, and the report of the Division 6 audit, to the person/s who will be performing the demolition or refurbishment works (and the register must be provided to the asbestos removalist, if removal works are necessary).

4.4. Asbestos Register Requirements

Monash University (OH&S) must record, in an Asbestos Register, the results of any asbestos identification audit or review.

4.5. Asbestos Register (Monash University Owned Properties)

The Asbestos Register must document:

- The location of the asbestos;
- The type of asbestos;
- Whether the material is friable or non-friable;
- The condition of the material (with associated risk rating);
- The likelihood for the material to sustain damage or deterioration;
- Any activities likely to be carried out that could damage or disturb the asbestos;
- Details of inaccessible areas that are likely to contain asbestos; and
- The date of each identification

OH&S maintain the Asbestos Register as an online database. Hardcopies of the register are also located within BPD.

Any enquiries with regard to the presence of asbestos in Monash University occupied buildings should be made to BPD (buildings.property@monash.edu).

4.6. Asbestos Register (Non-Monash University Owned Properties)

Where Monash University employees work in a building leased by the University, BPD (Contracts) will request a copy of the current Asbestos Register for that building prior to any refurbishment/maintenance work undertaken by Monash University.

4.7. Asbestos Register Risk Rating And Routine Condition Monitoring

A priority risk rating system for assessing the level of risk associated with identified asbestos is assigned to all identified ACM. The priority levels are:

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<th>Priority Level</th>
<th>Description</th>
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<td>P1</td>
<td>High Priority – Requiring immediate attention</td>
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<tr>
<td>P2</td>
<td>Medium Priority – May require action in the short term</td>
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<tr>
<td>P3</td>
<td>Low Priority – May require action in the medium term</td>
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<tr>
<td>P4</td>
<td>Very Low Priority – Requires ongoing management or longer term remedial action</td>
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</table>
A suitably qualified person (i.e. Occupational Hygienist) will be engaged every 5 years, as a minimum, to review the condition of ACMs in Monash University owned buildings, and allocate a risk rating.

Routine monitoring of the identified asbestos will be conducted by BPD based on the priority risk rating that has been assigned. The priority risk rating and monitoring schedule is based upon the recommendations within the audit report or as otherwise determined by OH&S.

4.8. Currency of Register

- The Asbestos Register must be reviewed and updated every 5 years, as a minimum. This work will be organised by OH&S and conducted by a suitably qualified person (i.e. Occupational Hygienist).
- The Asbestos Register must also be updated by OH&S when the condition of the asbestos has been identified to have changed or the asbestos has been removed.
- Where asbestos has been found that was not previously identified within a Monash University owned premises or plant, the Asbestos Register must be updated by OH&S.
- To facilitate the updating of the register all new reports (Division 6 audits, air monitoring, clearance etc.), pertaining to the identification, condition or removal of asbestos must be forwarded to OH&S.
- The online Asbestos Register will be updated within 4 weeks of notification to OH&S.

4.9. Access to the Register

Relevant aspects of the Asbestos Register must be provided to:

- Any employer, employee or self-employed person conducting works that could potentially disturb the asbestos (BPD);
- Any asbestos license holder engaged to conduct asbestos related activities (BPD);
- Anyone who proposes to occupy the workplace, upon request (BPD Contracts);
- Any person taking over the management and control of a Monash University owned site;
- Any person engaged to do work at the workplace, upon request (BPD); and
- The Health and Safety Representative for any affected Designated Work Group (OH&S).

The Asbestos Register will be readily available to any employee upon request by contacting OH&S via:

- T: 99020222 or
- E: ohshelpline@monash.edu

4.10. Labelling

All known ACMs in readily accessible locations in Monash University buildings must be labelled to indicate the presence of asbestos (with the exception of low-risk, non-friable ACMs in teaching or public areas e.g. laboratory bench inserts.
4.11. Strategic Asset Management Plan

The ‘Monash University Strategic Asset Management Plan’ details long-term proposals for major refurbishment, renovation and demolition works and determining budget requirements. A component of this process is to determine the impact from the presence of asbestos to the asset, including the condition of any asbestos containing materials.

4.12. Training

- OH&S provides asbestos awareness information sessions for staff working on, or near ACMs with regard to the safe management of ACMs.
- OH&S provide training to Projects and Services staff with regard to this procedure and the Asbestos Register.
- Contractors are informed of their obligations with regard to asbestos management via the mandatory online Contractor Induction and Contractor website.

4.13. Work With Potential to Disturb ACM

The Asbestos Register is to be referred to by the CRP and contractors prior to undertaking any maintenance/repair or other such minor works in a building, or on plant, and a Divisional 6 audit must be undertaken prior to any major works, such as refurbishment or demolition.

If it is deemed that any proposed works are likely to disturb ACM (or material assumed to be ACM) then the ACM must be removed by a licenced asbestos removalist prior to works commencing. This work will be organised through the CRP managing the work.

In the event that a material is discovered that is suspected of containing asbestos, or material that is known to be ACM but the condition is worse than that recorded in the register, then:

- Work that has potential to disturb the material must cease
- OH&S team is to be notified
- An incident report is to be raised in SARAH
- The Asbestos Register must be re-checked for mention of the item
- If not included in the Asbestos Register, the material must either be assumed to be ACM or arrangements made for the item to be analysed by a NATA accredited laboratory. The Monash University staff member managing the works is responsible for organising this. Advice may be sought from OH&S.
  - If asbestos is not detected in the material work may recommence
  - If asbestos is detected in the material and the work is likely to disturb it, the material must be removed prior to works commencing. The Monash University staff member managing the works is responsible for organising this. Advice may be sought from OH&S.
Suspect Material in a Building or Plant

- Suspect material found
  - Cease work in the area
    - Is the material in poor condition or likely to be disturbed by any work? (No/Yes)
      - Proceed with caution
    - Consult Asbestos Register
      - Is the material listed in Asbestos Register? (Yes/No)
        - Provide copy of report to OH&S
          - Provide copy of report to OH&S
            - Arrange for analysis of material by competent person (No/Yes)
              - If material identified as asbestos containing or suspected to be asbestos
                - Proceed with job
      - If material not listed in Asbestos Register
        - Update Asbestos Register
          - Forward Clearance Certificate to OH&S

For the latest version of this document please go to: http://www.monash.edu.au/ohs/
4.15. Asbestos Incident Management

This section specifically relates to the management of asbestos related risk as a result of an incident involving disturbance of ACMs.

4.16. Accidental Disturbance and Contamination

In the event that ACM is actively disturbed without adequate controls in place, surroundings are likely to become contaminated with airborne asbestos fibres and asbestos containing dust and debris.

If asbestos contamination is discovered or suspected notify BPD immediately and they will manage the process below:

- Access to the area must be restricted as soon as possible (signage, lock doors, hazard tape) provided that doing so does not introduce an unacceptable risk to health and safety
- Items should remain in the area and no attempt should be made by persons to clean up the area
- OH&S to be notified of the event as soon as possible
- Only trained competent persons wearing appropriate protective equipment to be allowed to enter the area. This will typically be an external occupational hygienist and/or a licensed asbestos removal contractor.
- The presence of asbestos and the extent of contamination (debris and airborne) to be assessed and guidance obtained from a suitably competent person i.e. an occupational hygienist. Air monitoring within the contaminated area may be required to assist with a risk assessment and risk communication.
- Any necessary decontamination works to be undertaken by a suitably licensed asbestos removalist in accordance with legislative requirements and recommendations from the suitably competent person. A clearance certificate to be obtained, where applicable, prior to reoccupation.
- Where rapid reoccupation is essential i.e. to enable access to essential services, the material should be assumed to be friable ACM, and the decontamination process undertaken in accordance with this.

4.17. Fire

Following a fire, and if structurally safe to do so, the extent of asbestos contamination should be determined by a suitably competent person and decontamination works undertaken as above.

4.18. Inhalation Exposure to Respirable Asbestos Fibres

Where it is suspected that staff/student/contractors or visitors may have had an inhalation exposure to significant levels of airborne respirable asbestos fibres:

- The person impacted must immediately notify their manager/supervisor or Monash University contact person
- OH&S to be notified as soon as possible following the incident
- An incident report must be entered in SARAH
- The incident must be investigated in accordance with the Hazard and Incident Reporting, Investigation and Recording Procedure
5. Asbestos Removal Work

For any asbestos removal work, BPD will engage an external contractor who holds a current appropriate asbestos removal licence. The removalist must hold an A Class licence for removal of:

- Friable asbestos; or
- Asbestos contaminated dust or debris (ACD), unless that ACD is associated with removal of non-friable ACM or is only a minor contamination.

For removal of non-friable ACM and associated ACD, the removalist must hold an A or B class licence.

5.1. Information

- Prior to any asbestos removal work, the asbestos register for the relevant asset must be provided to the asbestos removalist.
- BPD will provide a written scope to the asbestos removalist clearly indicating what ACM is to be removed and any specific requirements of the work.
- OH&S must be informed of all planned asbestos removal works prior to work commencing.
- The above is the responsibility of the BPD staff member managing the contract.

5.2. Notification to Regulator

- The asbestos removalist must provide written notification to WorkSafe Victoria at least five days prior to the work (24 hours if removal involves less than 10 square meters of non-friable ACM) and must provide a copy to their Monash University contact.
- The notification period does not apply if the removal work is due to a sudden unexpected event that may cause persons to be exposed to significant airborne asbestos fibres or if the removal work is necessary to immediately rectify a breakdown of an essential service.
- If the asbestos must be removed immediately, the asbestos removalist must notify WorkSafe Victoria in writing within 24 hours.

5.3. Communication

BPD, through Business Support, must inform stakeholders in the immediate and adjacent areas of any proposed asbestos removal work and the timing of the work.

The following minimum information must be provided regarding the planned asbestos removal:

- Statement that asbestos removal work is planned
- The location of the work
- When the removal work will commence
- When the removal work will conclude
- Access restrictions in place during the work
- Contact details of the BPD staff member managing the work and/or OH&S

The above information will typically be provided in the form of a Buildings and Property Division Works Notice.

BPD will also provide an information session to relevant stakeholders upon request.

5.4. Asbestos Control Plan

The asbestos removalist must prepare an asbestos control plan and provide it to BPD. It must be readily available to Monash University staff, students and contractors throughout the duration of the removal work.

5.5. Signage, Barricades And Access

The BPD staff member managing the works will ensure, so far as is reasonably practicable, that access to the asbestos removal work area is restricted. Those engaged in, or associated with, the asbestos removal work or persons otherwise allowed by Law to be in the asbestos removal area are to be allowed to enter.

Persons with access to the asbestos removal work area must comply with any direction of the licensed asbestos removalist. The person managing the works may refuse access to any person who does not comply with asbestos risk control measures or a direction of the licensed asbestos removalist.

5.6. Air Monitoring

For all asbestos removal work involving friable ACM, the person managing the works must engage an independent competent person (ie occupational hygienist) to undertake air monitoring of the asbestos removal area prior to the removal work commencing and whilst the licensed asbestos removal work is underway. Monash University may also decide to undertake air monitoring for the removal of non-friable ACM. The analysis (fibre counting) following the air sampling must be conducted by a NATA accredited laboratory.

The person managing the work must ensure that the results of air monitoring are provided to:
• OH&S
• The licenced asbestos removalist
• Any staff member, or other persons, in locations adjacent to the removal area, upon request

In the event of elevated air monitoring results all removal work must immediately cease until the cause is identified and the situation rectified (this may require further smoke testing to be undertaken in an enclosure).

5.7. Clearance

The person managing the works must arrange for a competent person who is independent of the asbestos removalist to undertake a visual clearance inspection on completion of the removal work. The clearance must include a thorough visual inspection of the asbestos removal work area and surrounds, including waste transit routes.

Air monitoring must be undertaken for asbestos removal projects involving friable ACM or non-friable ACM, even when the removal is less than 10 square metres. Associated fibre counting must be undertaken by a NATA accredited laboratory with airborne fibre levels to be less than 0.001 f/ml of air to achieve clearance.

5.8. Clearance Certificates

The asbestos removal work area must not be re-occupied for normal use until a clearance certificate has been issued by the competent person.

5.9. Record Keeping

Records of asbestos clearance certificates must be forwarded to OH&S.

A copy of the clearance certificate should also be kept by the Project Manager on the project file.

5.10. Asbestos Register Maintenance

The Asbestos Register to be updated by OH&S upon receipt of clearance certificates to reflect the asbestos removal work that was undertaken.

The Asbestos Register will also be updated upon receipt of inspection reports undertaken as part of a Division 6 audit.

5.11. Disposal Of ACM

The disposal of asbestos waste following removal, or any loose ACM debris, must be conducted by a licenced asbestos removalist.
6. Responsibility for Implementation

A comprehensive list of OHS responsibilities is provided in the document OHS Roles, Committees and Responsibilities Procedure. The responsibilities with respect to asbestos management are listed below.

**Buildings and Property Division (BPD)**
- Identify ACM within Monash University controlled assets (OH&S);
- Hold and maintain the Monash University Asbestos Register (OH&S);
- Request the Asbestos Register for all Monash University occupied leased properties, when required and forward to OH&S (Property and Leasing);
- Develop, implement and maintain a long-term plan for asbestos abatement for the University (Planning);
- Ensure all contractors engaged by BPD are informed of Monash University's expectations for the management of asbestos during Contractor Induction;
- Ensure all contractors engaged by BPD for maintenance/repair/refurbishment work to Monash University buildings and plant are provided with the relevant aspects of the Asbestos Register (BPD staff member managing the work);
- Ensure that a comprehensive audit of a building (Division 6 audit) is undertaken prior to any demolition, or major refurbishment, work being undertaken (Projects);
- When necessary, engage competent/suitably qualified persons to undertake specialised asbestos related work (BPD staff member managing the work or OH&S); and
- Ensure that due diligence is undertaken prior to the procurement of assets to ensure, as far as practicable, that the asset does not contain asbestos.

**OH&S**

Relevant responsibilities in above list, plus:
- Guide stakeholders with regard to asbestos related matters/risk
- Develop and provide awareness training with regard to asbestos and this procedure
- Assist with asbestos incident investigations and emergency response

**Head of Academic/Administrative Unit**

Ensure that due diligence is undertaken prior to the procurement of assets to ensure, as far as practicable, that the asset does not contain asbestos (specific advice with regard to the process for this and/or questions that should be asked prior to purchase can be obtained from Procure to Payment Services.

**Staff**
- Comply with this procedure
- Report hazards/incidents related to ACM on SARAH
- Undertake training as required

**Contractor Responsible Persons**
- Ensure all contractors engaged by the CRP are informed of Monash University's expectations for the management of asbestos during Contractor Induction;
- Ensure all contractors engaged by the CRP for maintenance/repair/refurbishment work to Monash University buildings and plant are provided with the relevant aspects of the Asbestos Register;
- Ensure that a comprehensive audit of a building (Division 6 audit) is undertaken prior to any demolition, or major refurbishment, work being undertaken;
When necessary, contact BPD to engage competent/suitably qualified persons to undertake specialised asbestos related work; and

Ensure that due diligence is undertaken prior to the procurement of assets to ensure, as far as practicable, that the asset does not contain asbestos.

**Contractors**

For works involving maintenance/repair/refurbishment/demolition of Monash University buildings or plant:

- Comply with relevant aspects of this procedure
- Request access to the Asbestos Register
- Report hazards/incidents relating to ACM to Monash University contact

## 7. Records

Refer to [OHS Records Management Procedure](http://www.monash.edu.au/ohs) for general requirements.

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### Status

- Revised

### Approval Body

- Monash University OHS Committee

### Legislation Mandating Compliance

- Occupational Health and Safety Act (2004), Victoria
- Occupational Health and Safety Regulations (2017) Victoria

### Related Policies

- [OHS Policy](http://www.monash.edu.au/ohs)

### Related Documents

- [Australian and International Standards](http://www.monash.edu.au/ohs)
  - OHSAS 18001:2007 occupational health & safety management system
  - AS4801 occupational health and safety management systems – specification with guidance for use

  - Compliance code ‘managing asbestos in workplaces’ (2008) Victoria
  - Compliance code ‘removing asbestos in workplaces’ (2008) Victoria

- [Monash University OHS Documents](http://www.monash.edu.au/ohs)
  - [Roles, Responsibilities and Committees Procedure](http://www.monash.edu.au/ohs)
8. Document History

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<td>1. Updated certification logo in header</td>
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<td>2. Updated definitions for Asbestos Containing Material and Respirable Asbestos</td>
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<td>3. Clarified type of asbestos containing material in section 4.2</td>
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<td>4. Updated sections 4.3 and 6 to clarify the responsibilities of Contractor Responsible Persons</td>
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