SYDNEY TRAINS SAFETY MANAGEMENT SYSTEM

OPERATING PROCEDURE 06.7: MANAGE RISKS WITH HAZARDOUS MATERIALS

Purpose

This purpose of this document is to provide instructions to Asset Managers, Line Managers and Project Managers to apply a risk management approach to hazardous materials in and around the workplace/worksites. The procedure includes instructions on arranging surveys, developing and maintaining hazardous materials registers.

Scope

This document is applicable to all Managers required to manage the identification of hazardous materials, manage hazardous materials registers and control exposure to hazardous materials. This procedure and related documents constitutes Sydney Trains' Asbestos Management Plan (AMP) except where a specific localised management plan exists within ST.

Process Flow

Process

6.7 Manage risks with hazardous materials
6.7.1 Identify hazardous materials
6.7.2 Assess risk
6.7.3 Determine control measures
6.7.4 Implement control measures
6.7.5 Monitor and review control measures
6.7.6 AMP Review

Figure 1 Process flow for manage risks with hazardous materials

Note

Management of asbestos within soils is detailed in EMS-09-PR-0158 Assessment and Remediation of Asbestos Contamination in Soil.

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Procedure

6.7: Manage risks with hazardous materials

Hazardous materials exist in Sydney Trains as components of plant, equipment, buildings structures and as debris in infrastructure as a result of past activities and may produce a risk to health when disturbed.

In Sydney Trains, hazardous materials relate to the following:

- asbestos containing materials (ACM);
- lead-based paint;
- lead-containing dust;
- polychlorinated biphenyl (PCB) compounds; and
- Synthetic mineral fibres (SMF).

The process to manage hazards materials includes:

- identification of the location of hazardous materials;
- assessment of the condition of the hazardous materials and their risk to health;
- control of the hazardous materials;
- review of the Hazardous Materials Register and Hazardous Site Management System (HSMS); and
- re-inspection of hazardous materials.

6.7.1: Identify hazardous materials

Prior to any works or purchasing of plant, equipment or facilities the Project/Asset Managers will identify hazardous materials by arranging a survey for:

- existing assets;
- when acquiring a new asset;
- prior to demolition or refurbishment works; and
- prior to undertaking excavation works.

6.7.1: (continued) The Project/Asset Manager is responsible for the following procedure.

Procedure

1. Engage a competent person to undertake the initial hazardous materials survey to identify and assess the condition of hazardous materials;
2. Record the findings in SMS-06-TP-4109 Hazardous Materials Register for plant, equipment, buildings and structures; and
3. Record the findings in SMS-06-TP-4745 Fleet Hazardous Materials Survey Register for rolling stock.

Note

Where it is reasonably believed or known that the asset does not contain asbestos, the Asset Manager must record on the respective Register - "No asbestos has been identified at (insert asset/location/identifier) or is likely to be present" and provide a reference in the register, to the evidence supporting the statement.

Supporting evidence to assess whether an asset does not contain asbestos or other hazardous materials includes:

- knowledge of the age of the asset;
- past use of the asset;
- reference to building plans or plant specifications; and
- documentation from suppliers.

The final prohibition for asbestos in the workplace came into effect on 31 December 2003.

Any refurbishment or extensions to the original building prior to 1990 and potentially up to 31 December 2003 may have involved the use of asbestos. Even if the original parts of the building did not contain asbestos, it should not be assumed that subsequent additions have no asbestos.

4. Treat suspect materials as hazardous until a competent person proves otherwise;
5. Appoint a register owner (custodian) to publish and maintain the Hazardous Materials Register;
6. Make sure hazardous materials are identified and documented in the Hazardous Materials Register when Sydney Trains acquires a new asset;
7. Ensure the Hazardous Materials Register is updated in the Hazardous Site Management System (HSMS). If it is a new register ensure the register is added to the HSMS data base;
8. Obtain a copy of the Hazardous Materials Register from the owner of a property when Sydney Trains leases a property from a third party; and
9. Provide lease holders with a copy of the relevant Hazardous Materials Register when leasing property to third parties.

6.7.2: Assess risks

The hazardous materials survey identifies hazardous materials and provides a qualitative risk assessment.

The Project/Asset Manager is responsible for the following procedure.

Procedure

1. Make sure the competent person engaged to identify hazardous materials, assesses the condition of the hazardous materials using SMS-06-TP-4109 Hazardous Materials Register; and
2. The competent person assesses the risk as high, medium or low, based upon the condition of the material and the likelihood that disturbance will result in exposure.

Note

Hazardous materials identified as high risk should be removed as soon as is reasonably practicable, e.g. friable asbestos that is in poor condition and located in an accessible area where it can be disturbed, is high risk.

6.7.3: Determine control measures

Project/Asset Managers must determine whether the following measures are applicable to their activities. They are responsible for the following procedure.

Procedure

1. Make sure property lease provisions, for Sydney Trains properties leased to third parties, include:
   - requirements for the safe management of any existing hazardous materials; and
   - requirement that the Asset Manager is notified immediately of any disturbance of hazardous materials.
2. Arrange for hazardous materials identified as high risk during the survey report to be removed or managed to prevent exposure. Other recommendations listed within the survey report should also be implemented;

6.7.3: (continued)

3. Refer to the following control operating procedures which contain the requirements to control exposure when working on or removing hazardous materials and emergency procedures:
   - SMS-06-OP-3045 06.18 Managing Asbestos Works
   - SMS-06-OP-3044 06.17 Managing Lead Paint and Coatings Works
   - EP 00 00 07 SP Requirements for Handling and Disposing of Materials Containing PCB.
4. Refer to the SafeWork Code of Practice "Safe Use of Synthetic Mineral Fibres – 1993" before undertaking removal of SMF materials, such as insulation.
5. Organise labelling of hazardous materials except in public areas where the warning labels may cause unnecessary alarm. The number of labels should be in accordance with the size and location of the asset. Where it is not practicable to use labels, post warning signs at the contractor sign-in locations.

6.7.4: Implement control measures

Project/Asset Managers are responsible for the following control measures.

Procedure

1. Document the controls and actions implemented in the Hazardous Materials Register;
2. Provide leaseholders with a copy of the Hazardous Materials Register;
3. Inform workers of the location of the Hazardous Materials Register for that location;
4. Make the Hazardous Materials Register accessible (e.g. at the sign in points) for:
   - any workers, including contractors, at the location; and
   - safety representatives exercising a function under the WHS Regulations 2017.
5. Refer to control operating procedures for the implementation of the control measures:
   - SMS-06-OP-3045 06.18 Managing Asbestos Works;
   - SMS-06-OP-3044 06.17 Managing Lead Paint and Coatings Works; and
   - EP 00 00 07 SP Requirements for Handling and Disposing of Materials Containing PCB.
6. Place labels in accordance with the size and location of the asset, where practicable; and
7. Where it is not practicable to use labels, post warning signs at the

contractor sign-in locations.

6.7.5: Monitor and review control measures

Asset Managers are responsible for the following procedure.

Procedure

1. Arrange reinspections of hazardous materials in accordance with the reinspection frequency table below by a competent person;

Table 1 Reinspection frequency of hazardous materials

Hazardous materials	Risk rating	
	Medium	**Low**
Bonded Asbestos	2 years	5 years
Friable Asbestos	N/A	2 years (sealed fire doors at 5 years)
Lead-containing paint	2 years	5 years
Lead-containing dust (≥1,500mg/m^3)	Conduct risk assessment prior to removal/major disturbance	Conduct risk assessment prior to removal/major disturbance
PCB	N/A	Prior to removal/replacement
SMF	N/A	Prior to removal/replacement

All hazardous materials items are to be inspected prior to removal or disturbance. Friable asbestos of a medium risk or other hazardous materials rated as high risk should have corrective actions implemented immediately (or access restricted) to reduce risk. Lead dust should not be re-inspected but should be assumed to be present with applicable access controls or remediation implemented. The investigation level of ≥1,500mg/m^3 has been adopted; levels above this should have a specific risk assessment conducted prior to disturbance. Please note: levels above this does not indicate an area is unsafe to enter or work in.

2. Arrange for a competent person to undertake the reinspection using the existing Hazardous Materials Register; and
3. Update the Hazardous Materials Register in the Hazardous Site Management System (HSMS) data base:
   - following reinspections;
   - if additional hazardous materials have been identified; and
   - if hazardous materials have been removed, damaged, disturbed, sealed or enclosed at the workplace.
4. Competent persons must be engaged through the Sydney Trains Occupational Hygienist Panel. Engagement of this panel will ensure that Sydney Trains SMS procedures are followed and that HSMS registers are updated.

6.7.6: AMP Review

Project/Asset Managers are responsible for the ensuring that this AMP (or related documents including asbestos registers) must be reviewed and where necessary revised by a competent person if:

- the asbestos management plan is reviewed
- further asbestos or ACM is identified at the workplace, or
- asbestos is removed from or disturbed, sealed or enclosed at the workplace.

Asbestos registers must be reviewed every five (5) years.

References

SMS-06-TP-4109 Hazardous Materials Register

SMS-06-OP-3044 06.17 Managing Lead Paint and Coatings Works

EP 00 00 07 SP Requirements for Handling and Disposing of Materials Containing PCB

SMS-06-TP-4745 Fleet Hazardous Materials Survey Register

NSW Code of Practice: How to Safely Remove Asbestos 2016

NSW Code of Practice: How to Manage and Control Asbestos in the Workplace 2016

Version Control

Version	Change from previous	Date	Comment
1.0	First release of Sydney Trains SMS	01/07/2013	Launch of Sydney Trains SMS documents
1.1	Minor grammatical changes have been made to the document.	25/11/2013	The document has been amended to accommodate the changes.
1.2	Hop Logo and Approver Name Updated	28/08/2014	
1.3	Re-inspection dates, hyperlinks and minor changes	13/09/2017	
1.4	Minor changes and changes to referenced documents	17/08/2018	