Asbestos Cement Pipe

Repair & Removal Procedure

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Gippsland Water

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Procedural effectiveness assessments

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Contents

1	Introduction5		
	1.1 1.2 1.3 1.4	Purpose of the Process	5
2	Pro	dural Steps 7	7
	2.1 2.2 2.3	sbestos Registers 7 sbestos removal work that requires a licence 7 .2.1 Non-friable asbestos 7 .2.2 Licence to operate as an asbestos removalist 7 .2.2 Licence to operate as an asbestos removalist 7 .2.3 Licence to operate as an asbestos removalist 7 .3.1 Training Operators and Supervisors 8	7 7 3 3
		3.2 Respiratory protective equipment	9 9 9 9
		3.8 Asbestos control plan and record of removal 10 3.9 Job Safety Environment Analysis 10 3.10 Pipe Location & Uncovering 10 3.11 Removal Preparation 10 3.12 Pipe cutting and removal 10 3.13 Plugging of "decommissioned in place" pipes 11 3.14 Disposal & Decontamination 11))) 1
3	Gui	3.15 Documentation 12 .3.16 Overview 12 line Review 13	2
4		ences 13	3

1 Introduction

1.1 Purpose of the Process

Gippsland Water has above ground and underground assets that can potentially contain asbestos containing materials (ACM). Details on how in-situ asbestos containing materials are managed and detailed in the asbestos management plan.

This procedure provides instruction for employees repairing or removing asbestos containing materials under Gippsland Water's Class B Specific – Non Friable Asbestos Cement Water Pipes and Associated Fittings, in accordance with the *Occupational Health and Safety (Asbestos) Regulations 2017* and EPA requirements for transport and disposal of asbestos waste.

People with management and control of a workplace as well as employers and self-employed persons have duties to control exposure to airborne asbestos fibres in the workplace. Exposure to airborne asbestos fibres must be eliminated so far as is reasonably practicable. If exposure cannot be eliminated, exposure is to be reduced so far as is reasonably practicable to an acceptable level.

This procedure reinforces the requirements of Worksafe's Compliance Codes for Removing Asbestos in Workplaces and Managing Asbestos in Workplaces (2018).

1.2 Scope and Purpose of this Document

This work procedure shall apply to any employee or contractor engaged by Gippsland Water to repair, or connect to, asbestos cement pipelines and or fittings (see Section 1.3 – Class B Specific Licence)

1.3 Definitions & Abbreviations

ACM – Asbestos Containing Material

AC - Asbestos cement

AMIS – Asset Management Information System

Class B Specific Non Friable Asbestos Removalist – people licensed to remove a specific type(s) of non-friable asbestos containing materials

EDRMS - Electronic Document and Records Management System

Friable Asbestos – asbestos containing materials that when dry may be crumbled, pulverised or reduced to powder by hand pressure or as a result of work process becomes such that it may be crumbled, pulverised or reduced to powder by hand pressure.

GIS – Geographical Information System

Immediate and adjacent area – an area near where asbestos removal will takeplace or an area adjoining or directly facing the removal area (for example, one or more neighbouring buildings, or levels above and below the removal area within the same building), under section 54 of the Worksafe compliance code for Removing asbestos in workplaces

JSEA - Job Safety and Environment Analysis

Non Friable Asbestos – asbestos materials that have been compounded from asbestos mixed with cement or other hard bonding materials and are not able to be reduced to dust through the application of finger pressure.

Tapping – a sealed process for 'screwing' a ferrule into an existing main while still under pressure

1.4 Responsibilities

Gippsland Water

Must ensure, so far as reasonably practicable that

- exposure of a person in the workplace to airborne asbestos is minimised or eliminated
- Asbestos in the workplace is identified and managed appropriately

Managers/Coordinators/Team Leaders

All Managers, Coordinators and Team Leaders are to ensure that this asbestos procedure is implemented and followed by employees

This includes ensuring:

- information is provided to employees on the risks of exposure to asbestos and control measures to be used to eliminate or minimise exposure
- training is provided to employees for unit of competency Class B Asbestos
- audits are conducted to ensure compliance with legislation and this procedure
- medicals are provided in accordance with legislation

Employees

Employees are responsible for ensuring that

- Safe work practice implemented by Gippsland Water are followed
- Personal protective equipment is worn and tools are used as intended and in accordance with the information, training and instruction

2 Procedural Steps

2.1 Asbestos Registers

In accordance with our obligations under the Occupational Health & Safety Regulations (2017) and the WorkSafe Compliance Code for Managing Asbestos in Workplaces, Gippsland Water examines all its assets to locate and identify any asbestos containing materials. The location of AC water pipes is identified on the GIS. Above ground asbestos containing material is listed in the Above Ground Assets Asbestos Register (EDRMS Ref: <u>COR/15/6451</u> and is a working document that is updated every five years, as specified by the regulations, or as asbestos materials are removed or identified.

The risk associated with any identified material will be assessed and appropriate control measures implemented to ensure the workplace is safe

Since 1993, Gippsland Water has been maintaining a register of all in-service and decommissioned AC water mains within its corporate GIS.

This register contains the spatial location, pipe diameter, year of installation and decommissioning, document references and length of pipe. Details of each length of AC can be accessed via both GIS and AMIS.

All work is documented on both standard plans and field notes which are recorded in the EDRMS. The GIS and AMIS are updated using these documents.

When a pipe is decommissioned its details are updated in AMIS to "Expired" and its service status is changed to "Decommissioned in Place". In GIS, the pipe is moved from the in-service to decommissioned layer with a date and document reference for the replacement.

This information is made available via Dial Before You Dig (DBYD) to all users of DBYD.

Gippsland Water is obliged to provide access to both above ground and below ground asbestos registers via the responsible officer for contracts prior to commencement of works.

2.2 Asbestos removal work that requires a licence

2.2.1 Non-friable asbestos

Asbestos removal work involving non-friable ACM must be performance by a Class A or B Asbestos Removal licensed person if:

- the area of ACM to be removed exceeds 10 square metres in total, or
- the total time over which asbestos removal work is performed in any period of seven days exceeds one hour (this is the cumulative total time the asbestos removal work is carried out by all employees over a period of seven days).

2.2.2 Licence to operate as an asbestos removalist

WorkSafe Victoria has issued Gippsland Water a 'licence to operate as an asbestos removalist', under the Occupational Health and Safety Regulations 2007.

This licence type is a Class B Specific – Non Friable Asbestos Cement Water Pipes and Associated Fittings.

The licence lists Gippsland Water's nominated site supervisor, conditions, and exemptions.

Conditions of the licence are:

- 1. Central Gippsland Region Water Corporation must comply with the requirements of Part 4.4 of the Occupational Health and Safety Regulations 2017, and
- 2. Pursuant to Regulation 473(f) the Class B Specific asbestos removal licence granted to Central Gippsland Region Water Corporation is limited to the removal of non-friable asbestos cement pipes and associated fittings only.

Exemptions listed on the licence are:

1. Pursuant to Regulations 542(1)(b), Worksafe has granted Central Gippsland Region Water Corporation an exemption to allow for no notification for tappings, and

2. Pursuant to Regulation 542(1)(b), Worksafe has granted Central Gippsland Region Water Corporation an exemption to allow for no notification for unexpected breakdown of essential water service that requires immediate rectification to enable continuation of that service.

The requirement to notify applies under regulation 301, the duty to inform persons occupying premises in immediate and adjacent areas, as part of the most recent WorkSafe compliance code for *Removing asbestos in workplaces*, issued in 2018.

2.3 Requirements for Asbestos Cement Pipe Repairs and Removal

2.3.1 Training Operators and Supervisors

All employees operating under Gippsland Water's Class B specific licence or those that are at risk of exposure must have completed a WorkSafe Approved Class B asbestos training course.

The training shall cover:

- Health effects
- Dangers of smoking
- Appropriate controls
- Methods of removal
- Cleaning & maintenance
 of personal protective
 equipment
- Decontamination process
- Disposal

•

- Emergency procedures
- Maintenance of controls
- Legislation requirements

No employee shall be permitted to remove or repair AC Pipes unless they have completed the appropriate training and have been duly authorised to conduct this type of work.

Refresher training is to be provided every two years or whenever:

- Work methods change
- The type of equipment used changes
- The type of work changes

This training may be conducted internally by a competent trainer.

2.3.2 Respiratory protective equipment

All persons engaged in asbestos removal work must wear respiratory protection equipment (RPE) conforming to the requirements of AS/NZS 1716:2006

Non-disposable respirators need to be maintained in a clean and good working condition by the person responsible for their safe working condition (the removalist). All parts including filters, valves and seals, need to be inspected before and after each use. Respirator defects need to be reported immediately to the supervisor of the removal job for repair or replacement. (DO NOT PROCEED WITH ASBESTOS REMOVAL ACTIVITIES IF YOU IDENTIFY A DEFECT WITH YOUR RESPIRATOR HAS A DEFECT).

The respirator must be worn in accordance with the manufacturer's instructions and the coverall hood must go over the respirator straps.

Disposable respirators are not a preferred form of respiratory protection for asbestos removal work. If used, they must be disposed of as asbestos waste after a single use.

Non-disposable respirators must be cleaned and stored in a safe place away from contamination in an appropriate container.

IMMEDIATELY PRIOR TO COMMENCEMENT OF WORK AND ON EVERY USE, a

respirator fit check in accordance with training and the manufactures instructions. Do not proceed with removal activities if your respirator does not pass a fit check, and report this immediately to the supervisor.

For effective protection via negative-pressure respirators, asbestos removal employees must be clean shaven to achieve a face seal. Employees with beards, stubble or facial hair must use continuous flow positive pressure respirators to be appropriately protected.

2.3.3 Supervisors

Supervisors have been nominated and trained to oversee AC pipe repair/removal work and provide additional guidance as required. To act as a supervisor for asbestos removal works you must have submitted previous experience in asbestos removal and be approved and listed on Gippsland Water's licence by the WorkSafe licensing branch.

The nominated supervisor for a particular job is to be accessible by phone, and able to attend the repair/removal site within 20 minutes if required.

2.3.4 Medicals

Medicals shall be provided to all employees operating under Gippsland Water's Asbestos Cement removal licence for Class B Specific – Non Friable Asbestos Cement Water Pipes and Associated Fittings

- before the employee commences asbestos removal work for the first time
- at intervals of not more than two years
- within 30 days after the employee has ceased an asbestos related activity unless the employee has had a medical examination within the preceding year.

Results of employee medical examinations must be retained by Gippsland Water for 30 years.

The medical examination should be performed in accordance with the Guidelines for Health Surveillance [NOHSC:7039(1995)]

2.3.5 Notification to WorkSafe

Notification requirements under Gippsland Water's licence are as follows:

- Removal work in excess of 10 m² notify WorkSafe at least 5 days prior to work commencing (10 m² translates to about 17.9 lineal metres of 150 mm pipe, less for greater diameter pipes.)
- Removal work less than 10 m² notify at least 24 hours before work commences.
- Tappings No notification required

NOTE: Gippsland Water has a specific exemption regarding notification for unexpected breakdown of essential water services that requires immediate rectification to enable continuation of that service.

Notification forms may be downloaded from the WorkSafe website (www.workcover.vic.gov.au) or obtained from Safety Personnel.

2.3.6 Barricades and signage

Ensure adequate barricades and signage to protect the public from hazards associated with excavation work and asbestos removal.

Signs are to be placed in prominent locations.

In determining the distance between barriers and the asbestos removal area, the risk assessment needs to take account of:

- the type of ACM
- activity around the asbestos removal area (eg other workers, visitors, neighbours, the public) – ie other people's exposure
- the method of ACM removal
- any existing barriers (ie walls, doors, fences)
- the quantity of ACM to be removed
- the type of barrier used (eg hoarding or tape)

Reliance on signs and barricades alone to deny unauthorised access to the removal area is not sufficient. Staff should maintain a heightened awareness of those outside the removal area during removal and take action to ensure others avoid the removal site.

All barriers and warning signs must remain in place until a clearance to re-occupy the site has been granted by the removalist (upon completion of removal and decontamination and the removalist is satisfied the asbestos risk is removed).

2.3.7 Informing people in immediate and adjacent area

In line with the changed requirement to inform persons occupying premises, including domestic premises, in immediate and adjacent areas, the necessary details will be completed on the Postcard notifying of pipeline works involving asbestos removal ('postcard') and it will be left for the occupier of the premises immediately facing the works and the premises either side of the removal works.

The same postcard notification will be used for planned and reactive works.

The postcard will direct occupiers and those in immediate and adjacent areas to a list of Frequently Asked Questions, available via the Gippsland Water website.

2.3.8 Asbestos control plan and record of removal

Complete an Asbestos Control Plan and Record of Removal which is included at the end of this procedure or in the Repairs and Sewer Assets JSEA Proforma. The control plan abbreviates the safety control measures listed in this procedure. The record of removal section provides a record for 12 months; this record is to be provided to WorkSafe on request. This document is to be completed for all AC pipe removals and is to be retained and made readily available for inspection for 12 months.

2.3.9 Job Safety Environment Analysis

The asbestos control plan does not take away from the requirement to perform a JSEA prior to the commencement of works.

The JSEA must consider emergency planning. In the event of an emergency and where it is not reasonably practicable to decontaminate, section 223 of the compliance code states 'Decontamination procedures can be temporarily waived in the event of an emergency such as fire or serious injury or sick personnel'. As soon as reasonably practicable thereafter decontamination is to occur.

2.3.10 Pipe Location & Uncovering

Determine depth of pipe from drawings, probe or manual excavation. Using a combination of mechanical and manual excavation, carefully uncover section of pipe to be repaired/removed. Ensure safety precautions in trenching operations are employed

2.3.11 Removal Preparation

Put on PPE including Disposable Coveralls, Class P2 Respirator or half mask with cartridge, Gumboots and Gloves prior to commencing any works that may release asbestos fibres or create asbestos dust or pipe fragments.

No employee shall commence any such work unless they have achieved a satisfactory fit test with the respirator positioned on the face.

Prior to commencing removal, staff shall ensure that there is an adequate supply of asbestos waste bags and/or plastic for the disposal of contaminated PPE and asbestos waste within the barricaded work area.

Prior to the commencement of cutting operations, staff must ensure that there is an adequate supply of clean water on hand for the entire operation.

2.3.12 Pipe cutting and removal

Pipe cutting shall be performed using hand tools, wheel cutters, or compression cutters.

Make the cuts with a low speed hand tool such as a hand saw. **Abrasive disc power saws <u>must not be used</u>**.

Clean water must be run over the area of the pipe to be cut. This can be achieved by using a water saturated cloth above the saw blade and squeezing water over the blade and pipe to eliminate dust from the sawing, cutting action. During the sawing, cutting process, the removalist shall ensure the cloth is regularly re-saturated to achieve dust suppression. The removalists must ensure that selection of the appropriate dust suppression and elimination method reflects the activity undertaken (i.e. clean water supply and flow volumes to reflect type of ACM and pipe size.)

Remove the section of pipe to the side of the trench. Perform a visual inspection to and remove any visible fragments from the trench and place in an asbestos waste bag. Asbestos contaminated soil must be treated as asbestos waste.

Where reasonably practicable, the section to be removed should go back to the pipe collar or joint i.e. remove whole lengths of pipe.

Where not practicable to remove back to the collar or joint, employees should ensure the length removed extends past the pipe defect, and employees are to avoid standing on the pipe to prevent damage to the remaining in-situ pipework and fittings.

2.3.13 Plugging of "decommissioned in place" pipes

When removing asbestos pipe under this procedure for the purposes of placing a pipe into "decommissioned in place" status, Gippsland Water requires the decommissioned pipe to be plugged at each end with stabilised sand for a length of 500 mm (0.5 m). If this is not practicable then the supervisor or Gippsland Water responsible officer is to approve the plugged length.

2.3.14 Disposal & Decontamination

Cut a piece of 0.2mm heavy-duty plastic wrapping to a slighter longer length than the piece of pipe. Alternatively a purpose made asbestos waste plastic bag can also be used.

Wrap the pipe, fold the overlapping plastic over the pipe at both ends and secure with tape.

Place wrapped pipe in an asbestos labelled plastic bag and tie or tape the ends. Note: all waste must be effectively "doubled wrapped".

Non-disposable protective clothing e.g. gumboots and waterproof gloves should be rinsed clean, preferably with the person still in the trench to prevent run-off.

All used disposable clothing, respirators filters, cartridges, gloves, used saws etc. shall be treated as asbestos waste and disposed of into asbestos labelled waste bag. Respirator filters shall be used once only and then disposed of.

Employees shall ensure that they carry out personal decontamination each time they leave the asbestos work area (ie. ensure personal cleaning methods are used such as a wet wipe down to remove any potential dust, wipes used are to be disposed of as asbestos waste). Personal decontamination needs to be performed within the asbestos work area where recontamination cannot occur.

Employees who undertake work which requires strenuous effort, involves possible exposure to infectious agents or other contaminates or leaves them dirty or smelly, need to have access to showers before leaving work. This means that even though the asbestos removal aspect of the work may not require personal decontamination to include decontamination units (decontamination units are required for friable asbestos removal), access to showers before leaving work may still be required.

Personal washing and hygiene are essential, with particular attention to be paid to the hands, fingernails, face and head).

The double wrapped asbestos waste shall be securely and safely loaded (consider manual handling aspects) onto a Gippsland Water vehicle and transported from the worksite to the Depot where it shall be stored securely in a labelled skip bin. Each Depot shall contain a dedicated, secure and locked skip bin or container that shall hold the appropriately wrapped and labelled bundles of waste. Each skip or container shall be boldly labelled or stencilled "Asbestos Waste", no other material is to be deposited in these containers. The skip bin shall be located in a secure area.

The material must go directly from the worksite to the Depot Asbestos Waste Bins and not to another location, except where transport of ACM is by an EPA accredited ACM transporter in accordance with EPA requirements for transport and disposal of asbestos.

Stored asbestos containing materials at the depot shall be transferred to an EPA approved Waste Disposal Site. This shall only be by an EPA licensed contractor. The waste will be removed from the storage containers at each Depot on an as needs basis, and in any case no less than every six months.

2.3.15 Documentation

Complete work orders by recording all prescribed documentation accurately.

Closing the work order will update AMIS and reflect the work done on the AC pipe asset.

Complete the Asbestos Control Plan and Record of Removal. File these in EDRMS and attach to the work order.

2.3.16 Overview

Work practices that eliminate or reduce to a minimum the amount of dust generation and/or dispersal must be employed. Any asbestos products to be cut must be wetted down and cut with a low speed hand tool (e.g. hand saw) or compression cutter. Upon completion, the entire work area of the task must be visually inspected for asbestos type waste. As many broken pieces as practicable shall be collected. Waste pieces are to be doubled bagged in heavy-duty plastic bags, which are to be labelled "ASBESTOS – FOR DISPOSAL". All disposable clothing, respirators and respirator cartridges must also be included in these bags.

Broom sweeping of asbestos products, cuttings or associated dust and dirt is forbidden.

3 Guideline Review

This guideline and the information contained within will be reviewed by the Senior Safety Coordinator, in line with the annual Operational procedures review.

Review of this procedure can include in field assessments to determine its effectiveness. This will be accomplished by occupational monitoring (on the removalist) and para-occupational monitoring (at the work site boundary). The results of these assessments are to be made available to personnel carrying out the task.

Reference to previous assessments of this procedure, at that point in time are listed at the start of the document.

4 References

Victorian Occupational Health and Safety Act 2004 Occupational Health and Safety (Asbestos) Regulations 2017 WorkSafe Victoria Compliance Code Removing asbestos in workplaces 2018 WorkSafe Victoria Compliance Code Managing Asbestos in workplaces 2018 Industrial Waste resources Guideline Asbestos, transport and Disposal 2010 Worksafe Guidance Note Asbestos Contaminated soils 2010 Repairs on Water and Sewer Assets (JSEA) Proforma EDRMS ref <u>COR/07/24480</u> AS/NZS 1715:2009 Australian/New Zealand Standard: Selection, use and maintenance of respiratory protective equipment Gippsland Water Asbestos Cement Pipe Risk Management Position Paper March 2016 EDRMS ref COR/16/12925

ASBESTOS CONTROL PLAN AND RECORD OF REMOVAL OF NON-FRIABLE ASBESTOS CEMENT PIPES

This form is to be used for any asbestos cement pipe removal and is to be read in conjunction with Gippsland Water's Asbestos Cement Pipe Repair and Removal Instruction

Street Address:		Town:			
Work Order No:		Date:		me:	
Sketch of pipe removed. Include off	sets to property boun	daries and depths of	pipework		
			<i></i>	,	
Show details of property boundaries By initialling each of					
	,	0.0			
WORKS IN YOUR AREA - NOTICE	ES DELIVERED TO	STREET NUMBERS	\rightarrow		
Comments					
You have completed your fit	Initial:			Duration:	
check		Duration of remo	val work:		
	1.		2.		
Names of employees involved in					
this removal work:	3.		4.		
		_			
The works site and surrounding	Initial:	The asbestos pipe		Initial:	
area has been cleared of any AC Contaminant		wrapped in accorda	ance with the		
All asbestos material has been	Initial:			Initial:	
disposed of at the nearest Depot	Your asbestos r		isk has been		
and secured in the appropriate		cleaned and is read	ly for the next job		
lockable bin. Nominated 'asbestos supervisor' for	l r				
this removal & Contact Phone No					
The new instal (abataa amaminta	v io to be concelled	by phone and -	bla to attand the	
i ne nominated 'a		' is to be accessible a reasonable timefi		able to attend the	

Quantity of Asbestos Cement Pipe removed:	
Signed (Coordinator): <u>Only sign if</u> audit completed	Date:

This document meets the requirements of the Occupational Health and Safety (Asbestos) Regulations 2007 and the conditions of
Gippsland Water's Class B Specific licence for the removal of asbestos cement pipes, and is to be retained for a period of not less than
12 months from the date of the asbestos removal. A copy of this control plan is to be stored against the related Workorder No.as a record
of removal.

Printed Name:

ASBESTOS RISK CONTROL MEASURES

(to be read in conjunction with Gippsland Water's Asbestos Cement Pipe Repair and Removal Instruction

PE to be used (including RPE):

- Disposable Class P2 respirator of half face mask and cartridge
- Disposable overalls
- Gloves
- Gumboots

Control Measures to be Used:

Place barricades and signs to prevent unauthorised access to the asbestos removal area.

• Put on PPE before commencing any works that may release asbestos fibres or create AC dust or AC pipe fragments.

No employee shall commence any such work unless they have achieved a satisfactory fit test with the respirator positioned on face.

 Prior to commencing work, staff shall ensure that there are adequate asbestos waste bags and/or plastic for the disposal of contaminated PPE and asbestos waste.

• Prior to commencing work, staff are to ensure that there is an adequate water supply on hand for the entire operation to allow water to be run over area of pipe to be cut and decontamination of non-disposable clothing and equipment.

• Pipe cutting shall be performed using hand tools or compression cutters. Make sure the cuts with a low speed hand tool such as a Tungsten Hard Tipped Saw. Abrasive disc or other power saws must not be used.

Details of decontamination procedures:

Persons working in the removal area

• Upon the completion of the task staff shall immediately wash to maintain an appropriate state of personal hygiene relative to the activity undertaken. It is also recommended that staff use nailbrushes paying particular attention to fingernails.

Tools and equipment

• Non-disposable tools and equipment are to be rinsed clean with the person still in the trench to prevent runoff.

• Handsaws and other disposable equipment are to be 'double wrapped' and treated as asbestos waste.

Non-disposable clothing

• Non-disposable gumboots and waterproof gloves are to be rinsed clean with the person still in the trench to prevent runoff.

Method of disposal of:

Asbestos waste

• On completion of the works the entire area must be cleaned of all asbestos type waste. As many broken pieces as practicable shall be collected.

 Cut a piece of heavy-duty plastic wrapping to a slightly longer length than the piece of pipe. Alternately a purpose made asbestos waste plastic bag may be used.

• Wrap the pipe, fold the overlapping plastic back over the pipe at both ends and secure with tape.

• Place the wrapped pipe in asbestos labelled plastic bags, tie or tape end. Note all waste must be effectively 'double wrapped'.

• The double wrapped asbestos waste shall be securely and safely loaded onto an GW vehicle and transported directly from the work site to the depot, unless otherwise in accordance with EPA requirements for transport and disposal of asbestos.

• At the depot, the waste shall be stored in the secure skip bin designated for asbestos waste to await collection for disposal.

Disposable protective clothing and equipment

• All disposable clothing, respirators, cartridges, gloves etc must be rinsed and removed while in the trench if possible and the disposable clothing placed in the labelled asbestos waste bags.

• Used disposable clothing shall be regarded as asbestos waste and treated as above. Respirator cartridges shall be used only once and disposed after use.

Administrative Controls:

Security of area Non-authorised persons are to be segregated from the asbestos removal area by the use of barricades and 'men at work' signs.

Notification to Employers

• Employers in immediate and adjacent areas are to be informed of the proposed asbestos removal before commencement of works.

Work practices

 All employees involved in the asbestos removal process are to have completed the approved training course, including training in accordance with Gippsland Water's "Procedure for the Repair and Removal of Asbestos Cement Pipes", and be duly authorised to perform asbestos removal works.

Methods of cleaning following removal:

Non-disposable clothing is to be laundered using the facilities located at the depot.

• Where commercial laundering is sought, this is to be arranged through a Field Services Coordinator following consultation with the OH&S Coordinator and following the requirements of Regulation 4.3.78 of the OH&S (Asbestos) Regulations 2007.

• Under no circumstances is contaminated clothing to be laundered at an employee's private residence.

• Non-disposable gumboots and waterproof gloves should be rinsed clean with the person still in the trench to prevent runoff.

Other Risk Control Measures Not Listed Above:

The measures included in this control plan were developed from Gippsland Water's Asbestos Cement Pipe Repair and Removal Instruction and included consultation with operations and maintenance management and staff.

"Other Risk Control Measures Not Listed Above" used as parts of this control plan were developed by:

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