



City of Kalgoorlie-Boulder

Asbestos Management Plan

Hammond Park Castle –
3934 Memorial Drive,
West Lamington, WA 6430

13 March 2025

Contents

Executive Summary	3
Introduction	3
Legislative Requirements	4
Method	5
Asbestos Survey	5
Asbestos Registers and Risk Assessment.....	5
Asbestos Risk Matrix	6
Managing Asbestos	7
Control Measures	7
Personal Protective Equipment (PPE)	8
Coveralls.....	8
Footwear	8
Respirators.....	8
Personal Decontamination.....	8
Labelling.....	8
Air Monitoring Procedures.....	9
Securing the Work Area	9
Managing emergencies and incidents.....	9
Awareness and training.....	9
Roles and Responsibilities	10
CEO	10
Workers	10
Contractors	10
Engaging contractors	11
Record Keeping	12
Asbestos Register	12
Asbestos Management Records.....	12
Disposal of Asbestos Containing Material	13
Maintenance on ACM	13
Securing the Work Area	13
Completion of Works	14
Appendix A – Asbestos Site Register.....	15
Appendix B - Property Risk Survey	16
Inspection of location and presumed Asbestos Containing Materials	17
Location 1.....	17

Additional Comments	18
Acknowledgements	18
Media summary.....	19
Appendix D – Asbestos emergency management procedure	22
Emergencies	22
Appendix E: Maintenance on ACM Procedure.....	23
Maintenance Work	23
On-site Maintenance Work.....	23
Appendix F - References	24

Executive Summary

Introduction

Marsh was contracted by the City of Kalgoorlie-Boulder (City) to review and assess City owned buildings and assets for the presence of asbestos and where identified, develop registers for those buildings, assess the risks that the ACM poses and develop an Asbestos Management Plan. The asbestos registers and management plan were completed in accordance with the *Work Health and Safety (General) Regulations 2022*.

The asbestos assessments were completed by Katherine Kempin (Senior WHS Consultant – Marsh Advisory), in 2024.

This asbestos management plan (AMP) has been developed to assist the City with the safe and effective management of asbestos containing material (ACM) within their buildings and assets whilst complying with Work Health Safety legislation and applicable codes of practice.

Background information

Asbestos is a naturally occurring mineral rock made up of strong fibres that have fire, heat and chemical resistant properties.

While asbestos is now banned from use, it was a component of thousands of different products used in the community and industry from the 1940s until the late 1980s. Some uses of chrysotile asbestos products, mainly friction materials and gaskets continued until 31 December 2003.

Asbestos can pose a risk if fibres of a respirable size become airborne, are inhaled, and reach deep into the lungs in sufficient quantities. These respirable fibres are a major health hazard and can cause serious asbestos-related diseases that can take decades to become apparent.

The lack of immediate health effects has often meant that victims are unaware of the dangers they are exposed to, which means that exposure to the hazard can continue over a long period causing serious health effects.

Due to the health risks associated with asbestos, it is essential that exposure is effectively managed. Working on or near damaged asbestos-containing materials (ACM) without appropriate control measures in place increases the risk of exposure to airborne asbestos fibres.

Exposure to asbestos fibres is known to cause mesothelioma, asbestosis and lung cancer.

Legislative Requirements

- As a person conducting a business or undertaking (PCBU), the City of Kalgoorlie-Boulder has a responsibility to maintain a safe working environment under the provisions of:
- A PCBU is to identify hazards at a workplace, assess the risk of harm to a person from each hazard and to take steps to reduce the risk. - Chapter 3 of the Work Health and Safety (General) Regulations 2022 (WHS Regulations)
- A PCBU is to appropriately manage ACM through clearly identifying the presence and location of asbestos in City own assets, risk assess the likelihood of harm and implement effective control measures. *Chapter 8, Part 8.3 (WHS Regulations)*
- If material at the workplace cannot be identified but a competent person reasonably believes that the material is asbestos or ACM — assume that the material is asbestos. (*Work Health and Safety Regulations 2022 Management of asbestos and associated risks Part 8.3 r. 423*)
- If ACM is identified at the workplace or likely to be present in the workplace, an asbestos management plan should be prepared in relation to the naturally occurring asbestos. This plan must also be maintained to ensure the information is up to date.
- A PCBU must ensure that workers that may be involved in asbestos removal or asbestos-related work are trained to identify and safely handle asbestos and asbestos-containing materials (ACM). *Work Health and Safety Regulations 2022 Management of asbestos and associated risks Part 8.5 r. 445*

Government Policy

The long-term aim is for all buildings occupied or controlled by government agencies to be free of asbestos containing material (ACM).

Whilst working towards this goal, agencies have an obligation to identify and manage ACM in assets to meet the work health and safety requirements.

ACM in sound condition, left undisturbed, presents negligible risk to building occupants and the general community. Therefore, removal of asbestos may not be immediately necessary but should take into consideration immediate health risks and a safe work method statement (SWMS) must be completed prior to demolition, partial demolition, renovation or refurbishment if these works are likely to disturb ACM.

Remaining ACM should be regularly inspected, and actions taken to minimise health risks, where practicable.

All work conducted on ACM must be undertaken in such a manner as to minimise health risks.

Method

Asbestos Survey

Access to City buildings and assets was arranged with City representatives. Marsh conducted a visual assessment of City buildings to identify the presence, condition and potential for disturbance of ACM outside buildings and inside where access was possible with a focus on the specific locations (internal and external walls, flooring, roofs, ceilings, eaves, fascia's and fencing).

Where some areas were partially inaccessible, the external areas of these assets were assessed as thoroughly as possible. These inaccessible areas should be treated as if they possibly contain ACM, and relevant precautions should be taken in the event of maintenance, renovation or demolition work. Areas that were inaccessible have been identified on the asbestos registers.

Asbestos Registers and Risk Assessment

An asbestos register and risk assessments were developed based on the assessments for each asset identifying the location, condition, potential for disturbance and analysis of associated risk of ACM. The level of risk was assessed using the risk matrix below in accordance with guidelines developed by the Department of Communities Housing.

Asbestos Risk Matrix

ASBESTOS CONTAINING MATERIAL RISK ASSESSMENT MATRIX				
CONDITION OF MATERIAL	POOR	Risk Ranking 6 Unsealed or coating damaged. Severely weathered. <i>Low probability of disturbance.</i>	Risk Ranking 3 Unsealed or coating damaged. Severely weathered. <i>Medium probability of disturbance.</i>	Risk Ranking 1 Unsealed or coating damaged. Severely weathered. <i>High probability of disturbance.</i>
		Risk Ranking 8 Unsealed or coating deteriorated. Moderately weathered. <i>Low probability of disturbance.</i>	Risk Ranking 5 Unsealed or coating deteriorated. Moderately weathered. <i>Medium probability of disturbance.</i>	Risk Ranking 2 Unsealed or coating deteriorated. Moderately weathered. <i>High probability of disturbance.</i>
	GOOD	Risk Ranking 9 Sealed and coating in good condition. Unweathered. Surface sound and well bound. <i>Low probability of disturbance.</i>	Risk Ranking 7 Sealed and coating in good condition. Unweathered. Surface sound and well bound. <i>Medium probability of disturbance.</i>	Risk Ranking 4 Sealed and coating in good condition. Unweathered. Surface sound and well bound. <i>High probability of disturbance.</i>
		LOW	MEDIUM	HIGH
		PROBABILITY OF DISTURBANCE		

Asbestos Risk Control Matrix			
Risk Rating	Action	Priority	Timeframe
1 – 3	Consider safe removal of ACM and replace with non-ACM product	High	Immediately - Based on practicability
4 – 6	Consider enclosing the ACM through non-ACM disturbance measures	Medium	Within 6 months - Based on practicability
7 – 12	Consider sealing the ACM appropriately	Low	Within 6 months – Based on practicability
13 – 15	Monitor and review the ACM's condition	Very Low	Between 1 – 5 years
All	Consider safely sampling the ACM for verification	Low	Anytime
All	Signify ACM present (signage)	Immediate	Within one week of identification
Any	Other:	Based on practicability	Anytime

Managing Asbestos

Control Measures

As per *WHS reg.35 & 36*, as well as supporting *Codes of Practice*, control measures should reflect the hierarchy of controls. A combination of the following controls may be required to adequately manage ACM:

1. Elimination – removal is the preferred method of control
2. Isolation – enclosure and / or sealing of the ACM
3. Engineering controls
4. Administration – safe work method statements, signage etc. and
5. Personal Protective Equipment (PPE)

The control measures set out in the Asbestos Risk Control Matrix include:

- Consider safe removal of ACM and replace with non-ACM product. Removal of ACM must be considered in relation to the practicability to do this. Consideration is given to the current condition and likelihood for deterioration of the ACM. Is it in the budget / can it be put in the budget for future removal? What temporary measures need to be implemented until removal?
- The removal of asbestos is performed by suitably licensed and competent persons and under controlled conditions. Removal is the preferred measure to eradicate buildings with ACM from the City.
- Consider enclosing the ACM through non-ACM disturbance measures. Enclosing ACM involves installing a barrier between the ACM and other areas. This can prevent further physical damage to the exposed ACM. The installation of an enclosure should be conducted without disturbing the ACM.
- Consider sealing the ACM appropriately. Sealing refers to the coating of the outer surface of ACM with some sort of sealant compound that usually penetrates the substrate and hardens the material.
- Monitor and review the ACM's condition. This involves leaving the ACM in its current condition as it is sealed and in good condition and the surface is sound and well bound. The ACM will need to be inspected at regular intervals no greater than once every 5 years to ensure that there is no further deterioration or at the request of a Health and Safety Representative.
- Consider safe sampling the ACM for verification. This can be conducted at any time. The Environmental Health Officer may take a sample, and have it sent to a NATA accredited laboratory for testing which will confirm if ACM is present and the type of controls necessary.
- Signify ACM present. Signage (labels) shall be erected in all buildings where ACM is suspected or confirmed in accordance with legislative requirements. The sign / label should be located near the ACM without causing any deterioration to the ACM.

Personal Protective Equipment (PPE)

PPE should only be used where other more effective control measures are not practicable. All PPE that cannot be decontaminated should be disposed of as asbestos waste.

Coveralls

Disposable coveralls may be disposed of as asbestos waste. Clothes worn underneath coveralls should be thoroughly vacuumed using a vacuum cleaner with high efficiency particulate air (HEPA) filters to ensure fibres do not stay on clothes and are taken into the home.

Footwear

Pull on boots are preferred as they cannot let any fibres in the way lace up boots can through the eyelets of the laces.

Respirators

Respiratory equipment should remain on until all disposable PPE have been removed bagged and work clothes have been vacuumed. Respirators should not be worn around the neck when not in use or left anywhere where it may accumulate dust. Re-useable respirators should be cleaned after use in accordance with manufacturer's instructions. Class P3 filters should be used with respirators.

Personal Decontamination

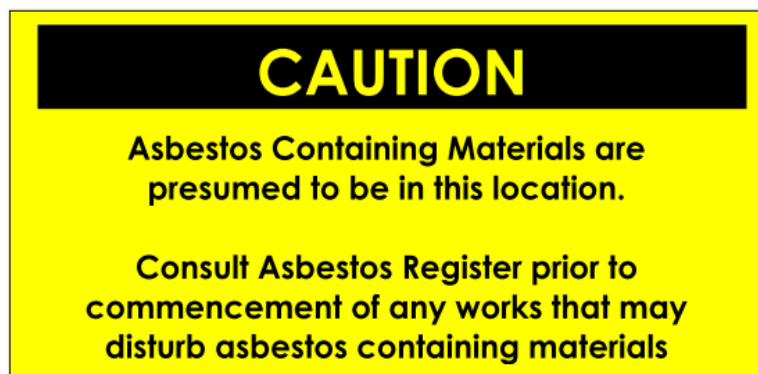
Asbestos fibres should not be transported outside the workplace. Ensure all disposable PPE are placed and sealed in a plastic bag and disposed with other asbestos waste.

Labelling

Labelling of ACM is a requirement under the *WHS reg.424*. An ACM hazard may not be immediately identifiable to all persons who may occupy or work within a building therefore information relating to this risk must be accessible.

Strategic placement of labels or signs is required to provide information to persons who may have to carry out work on assets with ACM or for those who simply occupy or work within those buildings.

An example of appropriate labelling is shown below:



These labels are used to advise personnel in the building that ACM has been identified and that an asbestos register exists and should be consulted prior to any disturbance.

Air Monitoring Procedures

Air monitoring may be used as a tool in assessing the risk of ACM, however air monitoring in isolation may not provide enough information to assess the risk.

Air monitoring may only be undertaken with the approval of the Responsible Officer. All air monitoring results should be documented and provided to the Responsible Officer for record keeping.

Securing the Work Area

Where minor work being carried out does not involve disturbing ACM, the Responsible Officer will need to determine that the work activities will not pose a risk to the health of personnel in those areas.

Where work activities involve the use of power tools and/or hazardous substances it is generally undesirable for workers and visitors to be present in the work area.

Where work involves the removal of ACM or has the potential to disturb ACM, the proposed work area must be isolated through the establishment of a ten-metre buffer zone and the Responsible Officer should arrange for the work to be conducted outside the normal business hours. All appropriate personnel must be advised of the work.

Managing emergencies and incidents

When managing with any emergencies, incidents, maintenance, onsite maintenance work and engaging contractors please refer to the Asbestos emergencies management procedure (Appendix D)

Awareness and training

Awareness and training regarding ACM, including general awareness, hazards associated, and relevant procedures should be conducted for all appropriate personnel.

Workers and contractors should be informed of the health risks associated with exposure to airborne asbestos fibres. ACM training given to workers shall cover the following:

- The health risks of ACM.
- The types of materials, uses and likely occurrence of asbestos in buildings and plant.
- The general procedures to be followed to deal with an emergency (e.g. an uncontrolled release of asbestos dust in the workplace).
- How to control the risks associated with ACM.
- Health surveillance.

And to relevant personnel:

- Assessing the risk and planning work.
- The correct use of control measures (PPE and safe work methods) and how these can reduce the risk of exposure to ACM and limiting exposure and the spread of asbestos fibres in the work area.
- Assessing exposure and air monitoring.

Exposure standards, and Maintenance and control measures.

Roles and Responsibilities

CEO

The CEO, or their delegated authority, is appointed as the “Responsible Officer” to ensure the effective implementation of the AMP. This person would be responsible for:

- Providing advice on asbestos issues.
- Developing and implementing the awareness of asbestos to workers.
- Ensuring workers are informed of their roles and responsibilities and of the risk control measures associated with ACM.
- Ensuring regular inspections of assets.
- Maintaining the Asbestos Register(s).
- Recording incidents or hazards.
- Reviewing and updating the AMP accordingly.

Workers

All other City workers are responsible for:

- Advising the Responsible Officer when contractors or tradespeople are on site.
- Ensuring precautions are taken to keep people clear of ACM being repaired, removed or upgraded.
- Reporting all incidents or potential hazards associated with ACM to the Responsible Officer.
- Complying with policies, procedures and instructions of the AMP.

Contractors

Contractors and tradespeople are responsible for:

- Ensuring their workers and sub-contractors are aware of their responsibilities.
- Reporting to the Responsible Officer prior to commencing work on sites with ACM.
- Complying with procedures of the AMP and as stipulated in contracts or other relevant guidance documents.
- Reporting all incidents or potential hazards to the Responsible Officer.

Engaging contractors

When engaging a contractor to carry out additions or repairs in areas where ACM has been identified the Responsible Officer shall:

- Advise the contractor of the asbestos register which records the presence and condition of ACM.
- Endeavour to advise all personnel likely to be affected by the work before the work involving ACM commences.
- ACM related work should be conducted outside of business hours to reduce the risk to personnel.

Supervision of contractors is required to ensure that ACM work practices are complied with including:

- Signs and barricades are erected.
- Specific safe work procedures are followed.
- Correct handling of in situ ACM.
- Clean up of work areas.
- Correct disposal practices.

Record Keeping

Asbestos Register

The asbestos register has been developed to provide information on ACM in City assets to ensure these assets are not inadvertently disturbed to cause a risk of harm to the health of workers including contractors, occupants or others.

The asbestos register must be maintained by the Responsible Officer.

The asbestos register, including risk assessments, shall be regularly reviewed when:

- The risk assessment indicates the timeframe for reassessment.
- The AMP is reviewed.
- Further ACM is identified.
- Asbestos is removed from, disturbed, sealed or enclosed.
- Requested by a health and safety representative.
- The register is no longer adequate for effectively managing ACM, or
- Scheduled no later than once every 5 years.

Asbestos Management Records

The Responsible Officer is responsible for maintaining a record of all asbestos management related activities, such as:

- Inspections.
- Hazard reports.
- Incident reports.
- Maintenance reports, including any repairs or replacements.

This includes ensuring documents are maintained, such as:

- The AMP.
- Risk assessments (part of the asbestos register).
- Sampling records should sampling be required.
- Air monitoring records should air monitoring be required.
- Name and details of contractors.
- Name and details of ACM consultants.
- Name and details of licensed asbestos removalists.
- Copies of asbestos removalist licenses.
- Copies of contractor's liability insurance noting the inclusion of cover for the removal of ACM.
- Details of refurbishments and removal/demolition works.

Disposal of Asbestos Containing Material

ACM waste must be disposed of in accordance with the requirements of the *Health (Asbestos) Regulations 1992*.

All asbestos material and waste must be separated from other waste and shall be either placed in polythene sheets 200 micron (µm) thick wrapped and sealed or placed in 200 micron (µm) thick polythene bags which are then sealed.

NOTE: All wrappings or containers containing asbestos waste shall be clearly labelled or marked with the words “**Caution Asbestos**” in letters no less than 50 millimetre high.

When the removal of large amounts of asbestos is involved, the material may be placed directly into disposal bins or skips that have been lined with polythene, 200 microns thick, and are to be used exclusively for that purpose. Material which may potentially contain asbestos fibres such as debris from gutters and drains which accept discharge from asbestos cement roofs must be placed in polythene bags and sealed. Disposable PPE and some materials and tools used in asbestos related jobs are to be treated as asbestos waste.

All asbestos waste shall be removed from the worksite and disposed of as soon as is practicable.

Documentation should also be supplied to any principal contractor to demonstrate that any asbestos waste has been disposed of to an approved site and in an approved manner.

Workers engaged to remove ACM must hold the relevant Asbestos Removalist License as required. The Responsible Officer should be advised immediately of any incidents when non-compliance with the AMP may have or has occurred.

Maintenance on ACM

The following procedure shall be followed in the event of maintenance on ACM. This procedure can be seen in appendix E.

When a project involves a team of more than one worker, the leader of the team will be responsible for ensuring that team members are individually aware of ACM procedures when working with ACM.

Securing the Work Area

Where minor work being carried out does not involve disturbing ACM, the Responsible Officer will need to determine that the work activities will not pose a risk to the health of personnel in those areas.

Where work activities involve the use of power tools and/or hazardous substances it is generally undesirable for workers and visitors to be present in the work area.

Where work involves the removal of ACM or has the potential to disturb ACM, the proposed work area must be isolated through the establishment of a ten-metre buffer zone and the Responsible Officer should arrange for the work to be conducted outside the normal business hours. All appropriate personnel must be advised of the work.

Completion of Works

Upon completion of works in an area where ACM has been identified and the nature of the material could lead to a contaminated airborne environment or where a licensed removalist has been engaged to remove ACM, a clearance inspection will be conducted by a competent Licensed Asbestos Assessor (LAA) and a clearance certificate obtained. The LAA will be independent from the workplace and may use methods such as visual inspections or use air monitoring to verify that the area is safe before the workplace is re-occupied.

Where non-friable sheets of less than 10sqms have been removed a visual inspection by the Responsible Officer is required to ensure all safe work procedures were followed.

Appendix A – Asbestos Site Register

City of Kalgoorlie-Boulder Asbestos Register																					
Date of Inspection	Address	Property File LGIS Ref.	CKB Asset No.	ACM Location	ACM Type	ACM Amount (m2)	ACM Presumed	ACM Condition	ACM Liable to damage or deterioration ?	ACM Risk Level	Control Measures Recommended	Comments	Testing Required	Testing Conducted	Site Inspection Attachment	Inspected by	Remediation to be Implemented	Remediation Completed Before	Responsible Person	Re-assess Prior to	
13/03/2025	Hammond Park Ornamental Castle - 3934 Memorial Drive, West Lamington WA 6430	155	N/A	Turrets to Castle Gatehouse (Centre Building) - panels underneath turrets	Panels	0.5	YES	Intact, not friable	No, if undisturbed	LOW	Seal to prevent deterioration. Monitor for wear and damages	Removal by a licenced asbestos contractor during refurbishment or demolition	Yes, before disturbed	No	Yes	Katherine Kempin	Seal to contain ACM and prevent further deterioration	N/A	Property Coordinator	13/03/2030	
13/03/2025	Hammond Park Ornamental Castle - 3934 Memorial Drive, West Lamington WA 6430	155	N/A	All Buildings within Village Compound - panels underneath all roof structures & turrets	Panels	40	YES	Damaged and deteriorating	Yes	LOW	Seal damaged ACM to prevent further deterioration. Monitor for wear and damages	Removal by a licenced asbestos contractor during refurbishment or demolition	Yes, before disturbed	No	Yes	Katherine Kempin	Seal to contain ACM and prevent further deterioration	N/A	Property Coordinator	13/03/2030	

Appendix B - Property Risk Survey

Hammond Park Castle

Complete

Document No.

155

Site Inspection for Asbestos Containing Materials

Hammond Park Castle

Client / Site

City of Kalgoorlie-Boulder



Photo 1

Conducted on

13.03.2025 11:55 AWST

Prepared by

Katherine Kempin

Location

39 Memorial Dr
West Lamington WA 6430
Australia
(-30.74166217052676,
121.45208283199584)

Personnel

Dehinga De Silva & Prajwol Shrestha

Inspection of location and presumed Asbestos Containing Materials

Assessment of location and presumed or known/ tested ACM

Location 1

Date and time of Inspection

13.03.2025 12:01 AWST

Describe location of the ACM/Presumed ACM

ACM Panels Underneath Turrets & Within Structures

Assumed ACM



Photo 2

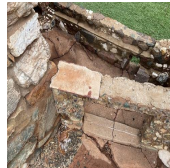


Photo 3



Photo 4



Photo 5



Photo 6



Photo 7

Asbestos Containing Material

Material type

ACM suspected
Hardiflex sheeting

Condition

Low

Details on Condition:

Deteriorating

Quantity sqm (apx)

41

Friable or Non-Friable

Non-Friable

Is this an inaccessible area?

Only accessed by maintenance staff
/ contractors

Actions for consideration:

Consider safe removal & replace
with non ACM

Monitor and Review the ACM's
condition

Consider safely sampling the ACM for
verification

Signify ACM present

Other details:

Seal or remove and replace with non ACM product

Removal by a licenced asbestos contractor during refurbishment or demolition

Additional Comments

Further Corrective Action Required

All identified materials are to be treated as containing asbestos material until testing has been completed. Samples shall be collected by a competent person and analysed by a NATA accredited laboratory in accordance with Work Health and Safety Regulations 422 & 423.

Acknowledgements

Inspected by

Katherine Kempin
06.06.2025 14:01 AWST

Media summary



Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7

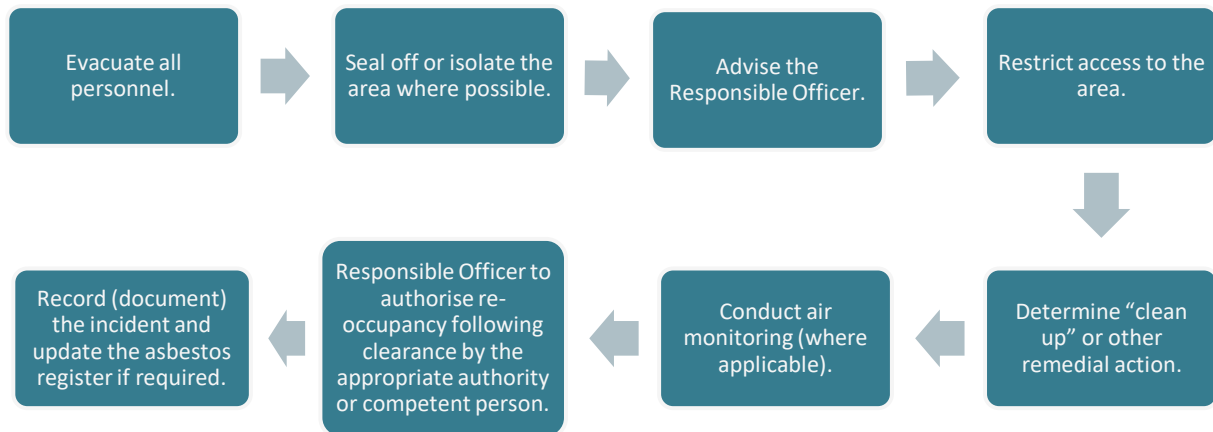
Appendix C - Asbestos Maintenance Log

[illegible]

Appendix D – Asbestos emergency management procedure

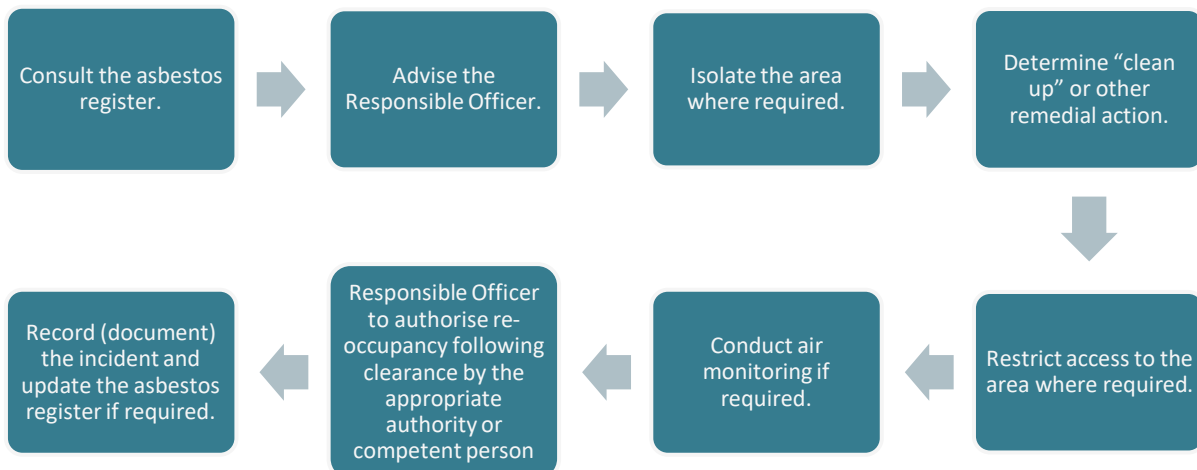
Emergencies

In an emergency where the health of personnel is at an imminent risk from an unexpected event (e.g. earthquake or collapse of a structure which contains ACM), the following procedure shall be followed



Incidents

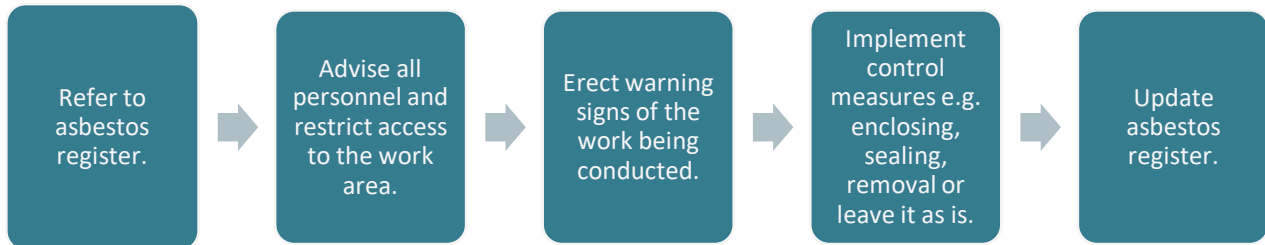
Other incidents may occur, such as, a contractor unknowing drilling or cutting into ACM. In this situation the following procedure shall be followed:



Appendix E: Maintenance on ACM Procedure

Maintenance Work

The following procedure shall be followed in the event of maintenance on ACM where material is accessible, stable, and unlikely to become airborne:



On-site Maintenance Work

The following is a list of typical maintenance and service tasks that may disturb ACM and may only be performed after a risk assessment is completed and control measures have been implemented to minimise exposure to airborne fibres:

- Drilling of ACM.
- Sealing, painting, coating where sanding is required of ACM.
- Cleaning leaf litter from gutters of non-sealed ACM.
- Replacement of electrical components affixed to switch boards made of ACM.
- Inspection of in situ asbestos friction materials or seals.

When a project involves a team of more than one worker, the leader of the team will be responsible for ensuring that team members are individually aware of ACM procedures when working with ACM.

Workers engaged to remove ACM must hold the relevant Asbestos Removalist License as required. The Responsible Officer should be advised immediately of any incidents when non-compliance with the AMP may have or has occurred.

Appendix F - References

Work Health and Safety Act 2020

Work Health and Safety (General) Regulations 2022

Code of Practice: How to manage and control asbestos in the workplace – Safe Work Australia

[NOHSC:2018 (2005)] Code of Practice for the Management and Control of Asbestos in Workplaces

[NOHSC:2002 (2005)] Code of Practice for the Safe Removal of Asbestos 2nd Edition

Health (Asbestos) Regulations 1992

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