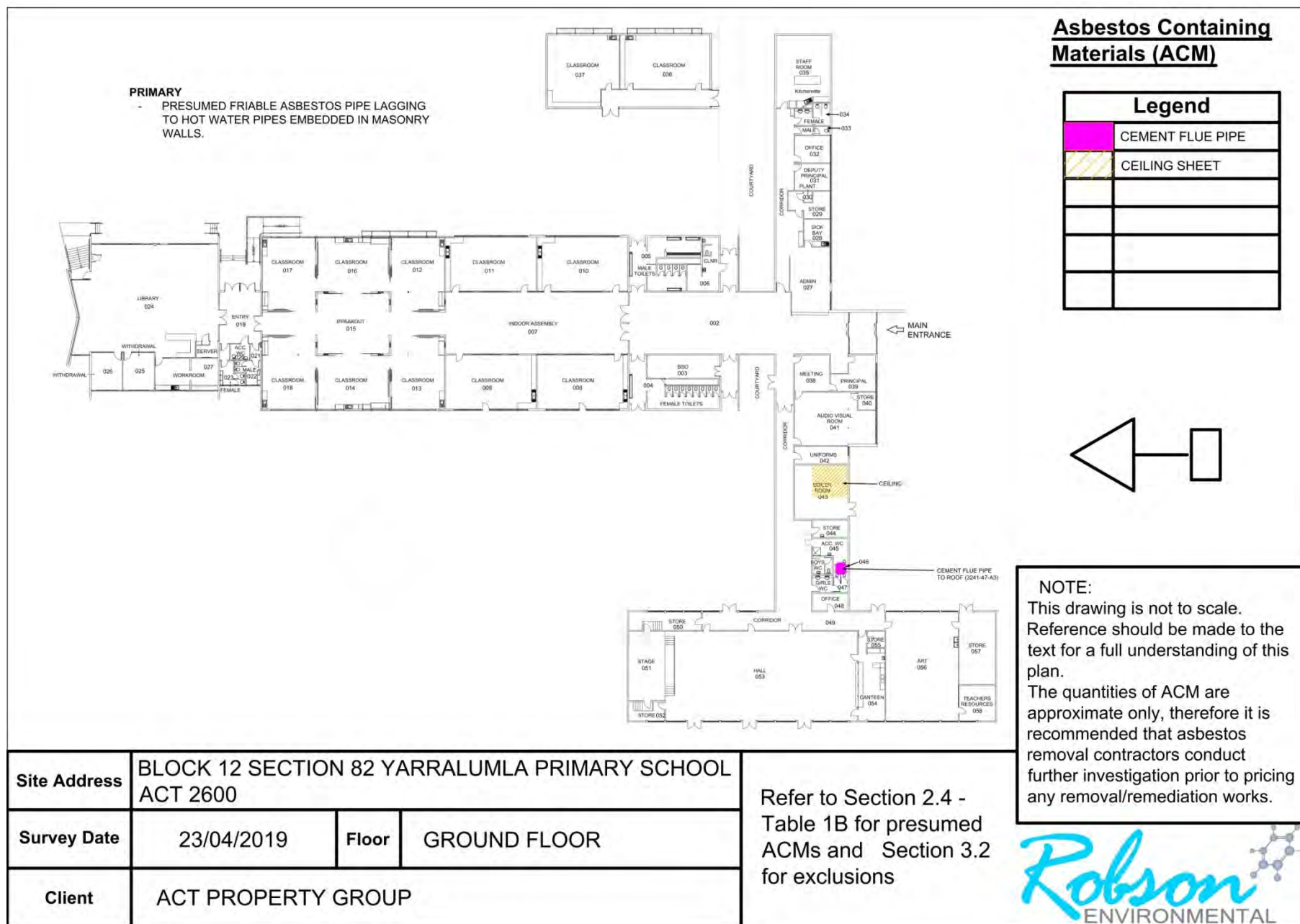
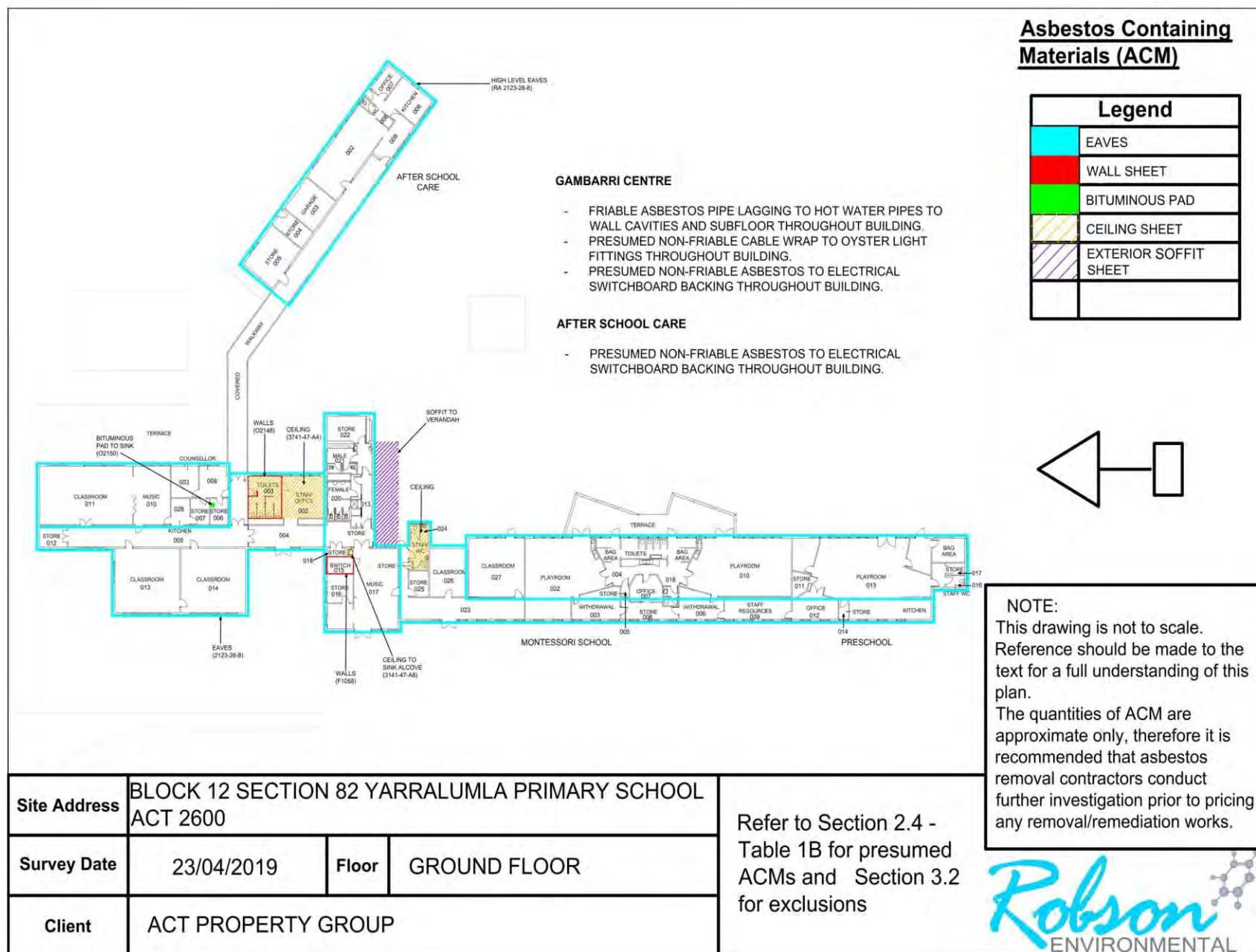




## 9.2 APPENDIX B - Plans







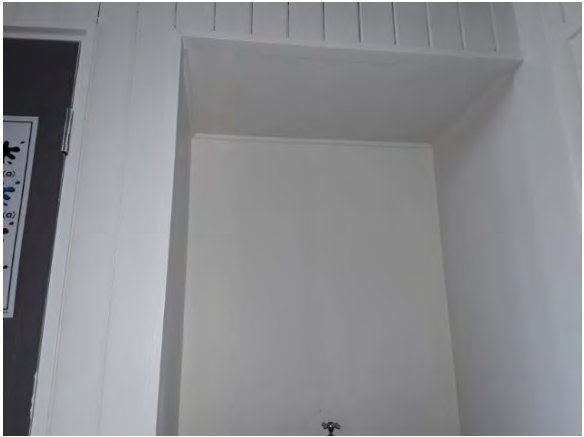
### 9.3 APPENDIX C – ACM Item locations & representative photographs




After School Care				
SAMPLE NO	TRACKER LOCATION NO	LOCATIONS	ACM TYPE	PHOTOGRAPH
RA 2123-28-8	001	Exterior - high level eave soffits	Sheet (Non-Friable)	
VA04	N/A	Electrical switchboards - backing boards (throughout building)	Sheet (Presumed Non-Friable)	



Gambarri Centre				
SAMPLE NO	TRACKER LOCATION NO	LOCATIONS	ACM TYPE	PHOTOGRAPH



Gambarri Centre				
SAMPLE NO	TRACKER LOCATION NO	LOCATIONS	ACM TYPE	PHOTOGRAPH
RA 2123-28-7	001	Exterior rear verandah - soffits	Sheet (Non-Friable)	
2123-28-8	001	Exterior - eave soffits	Sheet (Non-Friable)	
RA 3741-47-A4	003	Ground floor toilets adjacent Staff Office - ceiling	Sheet (Non-Friable)	




Gambarri Centre				
SAMPLE NO	TRACKER LOCATION NO	LOCATIONS	ACM TYPE	PHOTOGRAPH
RA 3741-47-A4	024	Ground floor staff toilet - ceiling	Sheet (Non-Friable)	
3741-47-A4	002	Ground floor Staff Office - ceiling	Sheet (Non-Friable)	
3741-47-A8	017	Ground floor Music Room - ceiling to sink alcove	Sheet (Non-Friable)	

Gambarri Centre				
SAMPLE NO	TRACKER LOCATION NO	LOCATIONS	ACM TYPE	PHOTOGRAPH
D2148	003	Ground floor toilets adjacent Staff Office - walls	Sheet (Non-Friable)	
D2150	006	Ground floor store room - to underside of sink	Bituminous pad to underside of sink (Non-Friable)	
F1058	015	Ground floor Electrical Switchboard Room - walls	Sheet (Non-Friable)	

Gambarri Centre				
SAMPLE NO	TRACKER LOCATION NO	LOCATIONS	ACM TYPE	PHOTOGRAPH
O1318	004	Corridor wall cavity to main entrance - to hot water pipes in wall cavity and subfloor (throughout building)	Pipe lagging (fibrous) (Friable)	
VA02	024	Staff toilet - oyster light fittings (throughout building)	Cable wrap (Presumed Non-Friable)	
VA05	N/A	Electrical switchboards - backing boards (throughout building)	Sheet (Presumed Non-Friable)	No photograph available

Primary				
SAMPLE NO	TRACKER LOCATION NO	LOCATIONS	ACM TYPE	PHOTOGRAPH



Primary				
SAMPLE NO	TRACKER LOCATION NO	LOCATIONS	ACM TYPE	PHOTOGRAPH
3741-47-A3	001	Exterior - to roof	Cement flue pipe (Non-Friable)	
P0322	043	Ground floor Boiler Room - ceiling around flue	Sheet (Non-Friable)	
VA01	N/A	Wet areas - to hot water pipes embedded in masonry walls (throughout building)	Pipe lagging (fibrous) (Presumed Friable)	

Primary				
SAMPLE NO	TRACKER LOCATION NO	LOCATIONS	ACM TYPE	PHOTOGRAPH
VA03	N/A	Electrical switchboards - backing boards (throughout building)	Sheet (Presumed Non-Friable)	No photograph available

## 9.4 APPENDIX D – Glossary

Air monitoring <sup>1</sup>	Air Monitoring means airborne asbestos fibre sampling to assist in assessing exposures and the effectiveness of control measures. Air monitoring includes exposure monitoring, control monitoring and clearance monitoring. <i>Note: Air monitoring should be undertaken in accordance with the Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres [NOHSC: 2003 (2005)]</i>
Airborne asbestos fibres <sup>2</sup>	Any fibres of asbestos small enough to be made airborne. For the purposes of monitoring airborne asbestos fibres, only respirable asbestos fibres (those less than 3µm wide, more than 5µm long and with a length to width ratio of more than 3 to 1) are counted.
Amosite	Grey or brown asbestos
AMP	<i>Asbestos Survey and Management Plan</i>
AR	<i>Asbestos Register</i>
Asbestos Containing Material (ACM)	Any material, object, product or debris that contains asbestos.
Asbestos Register	Inventory of ACM by type, form, location, risk and required action.
Asbestos Removalist <sup>2</sup>	A licensed person who performs asbestos removal work. <i>Note: licensing requirements vary from state to state/territory.</i>
Asbestos Survey and Management Plan (ASMP)	Document covering the identification, risk assessment, control and management of identified asbestos hazards, developed in accordance with current legislation.
Asbestos <sup>2</sup>	The fibrous form of mineral silicates belonging to the serpentine and amphibole groups of rock-forming minerals, including actinolite, amosite, anthophyllite, chrysotile, crocidolite, tremolite or any mixture containing one or more of the mineral silicates belonging to the serpentine and amphibole groups.
Asbestos–cement (AC) <sup>2</sup>	Products consisting of sand aggregate and cement reinforced with asbestos fibres (e.g. asbestos cement pipes and flat or corrugated asbestos cement sheets).
Chrysotile	White asbestos
Clearance inspection <sup>2</sup>	An inspection carried out by a licensed Asbestos Assessor to verify that an asbestos work area is safe to be returned to normal use after work involving the disturbance of ACM has taken place. A clearance inspection must include a visual inspection, and may also include clearance monitoring and/or settled dust sampling.
Clearance monitoring <sup>2</sup>	Air monitoring using static or positional sampling to measure the level of airborne asbestos fibres in an area following work on ACM. An area is 'cleared' when the level of airborne asbestos fibres is measured as being below 0.01 fibres/mL.
Control monitoring <sup>2</sup>	Air monitoring, using static or positional sampling to measure the level of airborne asbestos fibres in an area during work on ACM. Control monitoring is designed to assist in assessing the effectiveness of control measures. Its results are not representative of actual occupational exposures, and should not be used for that purpose.

Crocidolite	Blue asbestos
Exposure monitoring	Air monitoring in the breathing zone to determine a person's likely exposure to a hazardous substance. Exposure monitoring is designed to reliably estimate the person's exposure, so that it may be compared with the National Exposure Standard.
Friable asbestos <sup>2</sup>	Asbestos containing material which when dry is or may become crumbled, pulverised or reduced to powder by hand pressure.
In situ <sup>2</sup>	Fixed or installed in its original position, not having been removed.
Inaccessible areas	Areas which are difficult to access without causing damage to the premises, such as wall cavities and the interiors of plant and equipment, or areas which cannot be safely accessed.
Licensed Asbestos Assessor	Person who is licensed to undertake the sampling and risk assessment of asbestos and provide recommendations on its safe management.
Membrane	A flexible or semi-flexible material, which functions as the waterproofing component in a roofing or waterproofing assembly.
NATA	National Association of Testing Authorities
Non friable asbestos	ACM that is bound into a stable matrix and cannot be reduced to a dust by hand pressure. Previously known as Bonded asbestos
PCMW	Person with control or management of a workplace
SWMS	Safe Work Method Statement



**From:** [Ebner, Joanne](#)  
**To:** [Malam, Sarah \(ACTEDU\)](#); [Hall, Jackie](#)  
**Cc:** [Byrne, Evan](#)  
**Subject:** HAZ 20-001 - Yarralumla PS - Lead Paint & ACM Remediation  
**Date:** Friday, 24 May 2019 12:07:00 PM  
**Attachments:** [T01035 Lead Paint Assessment 20190423.pdf](#)

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UNCLASSIFIED

Hi Sarah and Jackie

Please find attached a copy of a Lead Paint Assessment for Yarralumla Primary School.

Recommendations within the report have been considered with remediation works scheduled to be undertaken in the July 2019 school holidays in response to the following:

**Yarralumla Primary School Main Building**

- Sample ID – Pb03 – Grey Paint
  - Internal Cleaners’/Bathroom masonry walls
- Sample ID – Pb08 – Green Paint
  - Exterior windows and infill panels

**Yarralumla Gambarri and Preschool Building**

- Sample ID – Pb12 – White Paint
  - Exterior window frames and doors

**Yarralumla Primary School After School Care Building**

- Sample ID- Pb13 – White Paint
  - Exterior window frames and doors

Note: the remediation process will also include some asbestos removal.

Please place a colour copy of the attached within the school’s Hazardous Materials folder for future reference.

The contractors will contact you prior to the end of Term 2 to arrange site access.

To assist in planning the works could you please advise if there will be any site occupants (eg hirers, tenants, holiday programs etc) during normal business hours in the July 2020 school holidays.

Regards

*Joanne Ebner*

Joanne Ebner | Project Officer

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[www.education.act.gov.au](http://www.education.act.gov.au) | Facebook | Twitter | Instagram | LinkedIn | Google+

Your message is ready to be sent with the following file or link attachments:

T01035 Lead Paint Assessment 20190423

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

# Lead Paint Assessment

**T-01035 Yarralumla Primary & Preschool**

**Client: ACT Property Group**

**Survey Date: 23/04/2019**

## Certificate of Approval for Issue of Documents

Document Name	HMR319 – Lead Paint Assessment – Swab and Laboratory Analysis		
Report Issue Date	01/05/2019	Job Number	T-01035
Client	ACT Property Group	Client Representative	Evan Byrne
Sample Testing and Report Preparation	Reviewed	Approved	
Robson Environmental Pty. Ltd.	Robson Environmental Pty. Ltd.	Robson Environmental Pty Ltd	

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## 1 Introduction

Lead (Pb) paint is defined by the Australian Standard AS 4361.2 – 2017 (*Guide to hazardous paint management Part 2: Lead paint in residential, public and commercial buildings*) as a paint or component coat of a paint system containing lead or lead compounds, in which the lead content (calculated as lead metal) is in excess of 0.1% by weight of the dry film as determined by laboratory testing.

Analytical values of  $\leq 0.1\%$  Pb allow the sample to be categorised as being lead free paint.

It should be noted that this Standard relates only to the removal of lead paint. In the ACT and NSW, building waste which is painted with lead paint may be disposed of as general demolition waste regardless of the quantity or percentage of lead paint.

Lead in paint (as lead carbonate) is found extensively in homes and commercial and industrial buildings built pre-1970. Although Australian industry has generally phased out lead in paint, levels of below 1 percent are still permitted and industrial application of high-lead paint to residential/commercial dwellings may still continue (Standards Australia, 2017).

Lead-based paint may be a health issue if it becomes mobile in the environment or if ingested. For this reason, sealing or safe removal of paint is strongly recommended, particularly where it is flaking or exposed to the elements.

## 2 Survey Methodology

Robson Environmental Pty Ltd conducted an assessment for lead-based paint for ACT Property Group at Yarralumla Primary & Preschool Loftus Street Yarralumla ACT 2600 on 23 April 2019.

The paint samples were qualitatively tested using 3M™ LeadCheck™ Swabs. These are USA EPA-recognised for the determination of lead-based paint with a 600ppm lower detection limit. This is equivalent to 0.06% and is therefore appropriate for the categorisation of tested surfaces as being lead free paint.

If the 3M™ LeadCheck™ Swabs detected the presence of lead, paint samples of the relevant paint systems were collected. These samples were sent for quantitative analysis for lead concentration following the method stated in Appendix A of AS/NZS 4361.2:2017.

The sampling criteria provided below is taken from Section A4 Sampling Strategy clauses (a, b, c);

- (a) An adequate number of sample sites should be analysed to properly characterise the paint systems present on site.
- (b) For small surfaces such as architraves, windows and doors and cupboards, **a single** sample may suffice.
- (c) For large, uniformly painted surface areas such as the exterior facade of high rise buildings, or for interior walls and ceilings of large rooms, and where laboratory testing is employed, **composite** samples should be taken from three separate locations in 10m<sup>2</sup> sections.



A representative sample was collected from each location and individual analyses reported. All samples were individually sealed and double bagged, and couriered under Chain of Custody (COC) documentation to [REDACTED].

The following criteria were considered by a Licensed Asbestos Assessor (or competent person) when assessing the risk associated with lead paint systems. This qualitative assessment determines the Risk Rating. These are shown in Table 1.

- Location of the lead paint system
- Surface area of the lead paint system
- Condition of the lead paint system
- Accessibility of the lead paint system
- Likelihood of ingesting and/or inhaling lead paint particles

**Table 1: Risk Rating Levels and Action Plan**

Risk Rating Level	Action Plan
High (H)	Lead is present in paint that is in very poor condition (i.e. bad cracking, flaking, chalking and peeling observed). It covers a large surface area and/or is on a surface that is easily accessible to children. It may present a health hazard with minor disturbance. Action should be taken immediately to reduce exposure risk.
Medium (M)	Lead is present in paint that is in average condition (i.e. some cracking, flaking, chalking and peeling observed). It covers a small surface area and/or is on a surface that is not easily accessible to children. It may present a health hazard with moderate disturbance. Action should be taken as soon as practicable to reduce exposure risk.
Low (L)	Lead is present in paint that is still in good condition (i.e. no cracking, flaking, chalking or peeling observed) and is not a friction or impact surface. It is not likely to present a health hazard unless significantly disturbed. Ongoing actions to maintain the lead paint system in good condition and to check it periodically to ensure a low exposure risk.
Nil (N)	Lead was not detected in paint system being assessed. No action required.

### 3 Results and Recommendations

The quantitative laboratory results analysed from the samples collected on 23 April 2019 show that seven lead paint systems contain lead concentrations in excess of the 0.1% by weight threshold. These paints are required to be managed as lead paint so risk can be minimised. Please note that AS/NZS 4361.2 states that if *'one or more tests from a building or portion of a building indicate that lead is present, the paint should be treated as lead paint'*.

The results also show that eight lead paint systems may be considered lead-free because the percentage of lead detected in the paint samples sent for laboratory analysis were less than or equal to the 0.1% by weight threshold. This shows that the concentration is below the definition for lead paint and the paint systems pose no risk.

Table 1 presents lead composition in paints, with results shown as a 'yes' or 'no' for the presence of lead within the paint samples tested as well as the exact percentage of lead determined through laboratory analysis. Recommendations suitable for the relevant lead paint system risk rating are also explained here. Photographs of samples are included in Appendix 1 and the full laboratory report is in Appendix 2.

**Table 1: Lead Composition in Paint by Qualitative and Quantitative Testing**

Sample ID	Sample Location	Paint Colour	Classified as Lead Paint?	Percentage of Lead (%w/w)	Risk Rating	Recommendations
Pb01	Yarralumla Primary School Main Building – Internal window frames, door frames and skirting boards throughout	White	Yes	0.29	L	<p>Ongoing preventative action should be planned. This includes:</p> <ul style="list-style-type: none"> <li>Maintain the lead paint system in good condition.</li> <li>Check it periodically to ensure a low exposure risk (i.e. no cracking, flaking, chalking or peeling observed and that it is not a friction or impact surface).</li> <li>Review and update the risk rating appropriately.</li> </ul>
Pb02	Yarralumla Primary School Main Building – Internal radiator heating pipes throughout	White	No	0.090	N	No action required.
Pb03	Yarralumla Primary School Main Building – Internal Cleaners'/Bathroom masonry walls	Grey	Yes	0.19	M	<p>Action should be taken as soon as practicable to reduce exposure risk. This includes:</p> <ul style="list-style-type: none"> <li>Remediate using method detailed in this report.</li> </ul>

Pb04	Yarralumla Primary School Main Building – Internal Cleaners'/Bathroom walls	Dark Blue	Yes	0.82	L	<p>Ongoing preventative action should be planned. This includes:</p> <ul style="list-style-type: none"> <li>• Maintain the lead paint system in good condition.</li> <li>• Check it periodically to ensure a low exposure risk (i.e. no cracking, flaking, chalking or peeling observed and that it is not a friction or impact surface).</li> <li>• Review and update the risk rating appropriately.</li> </ul>
Pb05	Yarralumla Primary School Main Building – Internal Cleaners'/Bathroom riser walls and pipes	Spearmint/Green	Yes	0.26	L	<p>Ongoing preventative action should be planned. This includes:</p> <ul style="list-style-type: none"> <li>• Maintain the lead paint system in good condition.</li> <li>• Check it periodically to ensure a low exposure risk (i.e. no cracking, flaking, chalking or peeling observed and that it is not a friction or impact surface).</li> <li>• Review and update the risk rating appropriately.</li> </ul>
Pb06	Yarralumla Primary School Main Building – Internal brick walls throughout	White	No	<0.005	N	No action required.



Pb07	Yarralumla Primary School Main Building – Internal masonry walls throughout	Yellow	No	<0.005	N	No action required.
Pb08	Yarralumla Primary School Main Building – Exterior windows and infill panels	Green	Yes	0.32	M	Action should be taken as soon as practicable to reduce exposure risk. This includes: <ul style="list-style-type: none"> <li>Remediate using method detailed in this report.</li> </ul>
Pb09	Yarralumla Primary School Main Building – Exterior down pipes and fascias	Grey	No	0.1	N	No action required.
Pb10	Yarralumla Primary School Main Building – Exterior timber eaves	Grey	No	<0.005	N	No action required.
Pb11	Yarralumla Primary School Main Building – External window frames and doors	Grey	No	0.05	N	No action required.

Pb12	Yarralumla Gambarri and Preschool – Exterior window frames and doors	White	Yes	0.13	H	Action should be taken immediately to reduce exposure risk. This includes: <ul style="list-style-type: none"> <li>Remediate using method detailed in this report.</li> </ul>
Pb13	Yarralumla Primary School After School Care – Exterior window frames and eaves	White	Yes	0.28	H	Action should be taken immediately to reduce exposure risk. This includes: <ul style="list-style-type: none"> <li>Remediate using method detailed in this report.</li> </ul>
Pb14	Yarralumla Preschool – Internal roof support beam	Yellow	No	<0.005	N	No action required.
Pb15	Yarralumla Preschool – Internal and external window frames, pergola frame and doors	Grey	No	<0.005	N	No action required.

## 4 Remediating Surfaces Containing Lead Paint

The main exposure risk associated with lead paint is when it becomes an airborne dust or fume. When paint deteriorates through chipping, cracking, bubbling and flaking, it is not becoming an airborne dust and cannot be easily inhaled.

The key to safely remediating surfaces containing lead paint is to prevent the generation of dust and fume. As a result, sanding, buffing, grinding, burning and wet/dry abrasive blasting is not appropriate. Abrasive blasting is defined as propelling a stream of abrasive material at high speed against a surface using compressed air, liquid, steam, centrifugal wheels or paddles to clean, abrade, etch or otherwise change the original appearance or condition of the surface.

Safe Work Australia prohibits abrasive blasting of lead materials and lead paint systems above a concentration of 0.1% by weight. Refer to <https://www.safeworkaustralia.gov.au/chemicals>.

To safely remediate surfaces containing lead paint, the following method is acceptable:

1. If indoors, shut all windows and doors to enclose the work area and place heavy duty plastic sheets on the floor to ease clean up.
2. If outdoors, plan your work for a day that is not windy and when rain is not predicted. Cover the ground below the painted surface with heavy duty plastic sheeting. For example, strips that are two metres wide would be suitable for the external wall of a house.
3. Workers are to:
  - a. Be clean shaven.
  - b. Wear appropriate respiratory protection. A minimum of P1 is essential but P2 respirators (i.e. disposable masks) are preferred.
  - c. Wear gloves.
  - d. Wear a hat to prevent lead paint chips from getting stuck in hair and being accidentally removed from the area.
  - e. Wear disposable coveralls to prevent lead paint chips from getting into pockets, stuck to sweaty skin or getting inside work shirts, etc. and being accidentally removed from the area. Note: Workers need to be aware of and prevent heat-related illness, maintain good hydration, take rest breaks in the shade, have cool drinking water available and avoid working during the hottest parts of the day if wearing disposable coveralls.
  - f. Wash hands and face before eating, drinking and smoking to prevent hand-to-mouth cross contamination.
4. Manually scrape all loose paint off the surface so the flakes fall on the plastic sheets. Note: no grinding, buffing, sanding, abrasive blasting, burning, etc.
5. When complete, fold up the plastic sheets to collect all the paint scrapings and dispose of them appropriately.
6. The surface can be repainted to bind the remaining lead paint to the structure. Several coats may be required to adhere all old paint to the structure again.
7. Next, the paint flakes that are already on the ground can be addressed:
  - a. Regarding sealed surfaces, such as concrete, bitumen, timber or tiles:
    - i. Paint chips can be removed with a HEPA vacuum cleaner.

- ii. The vacuum bag contents should then be carefully transferred to a heavy duty plastic bag to prevent dust from being released. Note: do not overfill the bags as they will become a manual handling risk and could tear open under the weight.
    - iii. Dispose of the waste appropriately.
  - b. Regarding unsealed surfaces, such as dirt, rocks or grass:
    - i. Wet the ground around the surface with a fine mist (not a heavy spray) or a diluted PVA glue solution to prevent dust from being generated in the next steps.
    - ii. Use a shovel to manually scrape approximately 10mm to 15mm of loose dirt and rocks from the top surface of the ground and collect it in heavy duty plastic bags. Note: do not overfill the bags as they will become a manual handling risk and could tear open under the weight.
    - iii. Dispose of the waste appropriately.
8. Continue to inspect the condition of the paint every 5 years to assess whether further deterioration has occurred.
9. Repeat this process whenever the paint system deteriorates to a point where remediation is required.
10. In the event that a structure containing a lead paint system is nominated for demolition:
  - a. Refer to the additional recommendations shown in the next section of this report.
  - b. Plastic sheets are unnecessary as they will get easily ripped up and damaged.
  - c. Workers need to be clean shaven and wear respiratory protection, gloves and exercise proper personal hygiene during the period they are handling lead painted materials.
  - d. Personal Protective Equipment (PPE) requirements can be reassessed once all the components containing a lead paint system are gone and only non-lead paint systems remain.
  - e. After the entire structure is gone, the ground will need to be scraped back to collect all residual paint flakes as described above.

## 5 Additional Recommendations for the Demolition and Disposal of Building Waste Containing Lead Paint

In the ACT & NSW, building waste painted with lead paint is classified as general building waste and may be disposed of without removing the lead paint. As a result, it is recommended that all materials that tested positive for the presence of lead paint be disposed of as general building waste.

The mechanical demolition of structures and objects painted with lead paint do not fall under the category of a 'lead process' as defined by the ACT Work Health and Safety Regulations 2011 (Section 392) so the requirements of Part 7.2 in the Regulations do not apply. Refer to <https://www.legislation.act.gov.au/View/sl/2011-36/current/PDF/2011-36.PDF>.

Only if you are intending to remove the paint from the structures/objects so they may be reused, recycled or refurbished, should the lead paint be removed in strict accordance with the methods specified in AS/NZS 4361.1 and AS/NZS 4361.2.

Due to similarities between environmental cleaning methods for lead paint and asbestos containing materials, it is recommended that a Class B licensed Asbestos Removalists be used to remove lead paint from materials being reused, recycled or refurbished.

Please note that it is not recommended to weld, cut or clean lead painted metal structures/objects using flame (i.e. electric arc, oxy gas, oxyacetylene, plasma arc, etc.) or abrasive cutting equipment that creates heat from friction (i.e. grinders, etc.) because it will burn the paint and generate fume containing lead. This falls under the definition of a 'lead process' as defined by the ACT Work Health and Safety Regulations 2011 (Section 392(i)) and the requirements of Part 7.2 of the Regulations apply.

It is recommended that only mechanical cutting methods that do not burn the paint be used (i.e. demolition shears) to avoid the requirements of Section 7.2 of the Regulations. Manually unbolting the pieces can also be done but this would be fairly time-consuming and heat should not be applied to stuck nuts/bolts as it will burn the lead paint.

## 6 Limitations

While Robson Environmental has taken all care to ensure that this report includes the most accurate information available, the report and any risk assessment presented is based on the information obtained by Robson Environmental at the time of sampling. Any variation in environment, activities, methods, practices, products, or equipment used may change exposures to hazards, invalidating the presented risk assessment. Robson recommends that risks be re-assessed prior to making any changes to the aforementioned factors.



The findings contained within this report are developed from the interpretation of the results of specific sampling methods used in accordance with generally accepted practices and standards, based on the current state of knowledge. To the best of Robson Environmental's knowledge, our assessment of the data represents a reasonable interpretation of the general conditions, and subsequent risk at the time of sampling. Should you have any questions or require further information please contact Robson Environmental.



## 7 References



- Buehler, S & Rhoda, D 2012, '3M™ LeadCheck™ Swabs qualitative spot test kit for lead in paint', Battelle.  
<https://www.epa.gov/sites/production/files/documents/3M-leadcheck-report.pdf>
- Standards Australia, 2017, *AS/NZS4361.1-2017: Guide to hazardous paint management, Part 1: Lead and other hazardous metallic pigments in industrial applications*, Standards Australia, Australia.
- Standards Australia, 2017, *AS/NZS4361.2-2017: Guide to hazardous paint management, Part 2: Lead paint in residential, public and commercial buildings*, Standards Australia, Australia.





## Appendix 1 – Photographs of Lead and Lead-Free Paint Systems


Sample ID	Sample Location	Paint Colour	Classified as Lead Paint?	Photograph(s)
Pb01	Yarralumla Primary School Main Building – Internal window frames, door frames and skirting boards throughout	White	Yes	
Pb02	Yarralumla Primary School Main Building – Internal radiator heating pipes throughout	White	No	



Sample ID	Sample Location	Paint Colour	Classified as Lead Paint?	Photograph(s)
Pb03	Yarralumla Primary School Main Building – Internal Cleaners’/Bathroom masonry walls	Grey	Yes	
Pb04	Yarralumla Primary School Main Building –Internal Cleaners’/Bathroom walls	Dark Blue	Yes	

Sample ID	Sample Location	Paint Colour	Classified as Lead Paint?	Photograph(s)
Pb05	Yarralumla Primary School Main Building – Internal Cleaners’/Bathroom riser walls and pipes	Spearmint/Green	Yes	
Pb06	Yarralumla Primary School Main Building – Internal brick walls throughout	White	No	



Sample ID	Sample Location	Paint Colour	Classified as Lead Paint?	Photograph(s)
Pb07	Yarralumla Primary School Main Building –Internal masonry walls throughout	Yellow	No	
Pb08	Yarralumla Primary School Main Building – Exterior windows and infill panels	Green	Yes	




Sample ID	Sample Location	Paint Colour	Classified as Lead Paint?	Photograph(s)
Pb09	Yarralumla Primary School Main Building – Exterior down pipes and fascias	Grey	No	
Pb10	Yarralumla Primary School Main Building – Exterior timber eaves	Grey	No	

Sample ID	Sample Location	Paint Colour	Classified as Lead Paint?	Photograph(s)
Pb11	Yarralumla Primary School Main Building – External window frames and doors	Grey	No	
Pb12	Yarralumla Gambarri and Preschool – Exterior window frames and doors	White	Yes	



Sample ID	Sample Location	Paint Colour	Classified as Lead Paint?	Photograph(s)
Pb13	Yarralumla Primary School After School Care – Exterior window frames and eaves	White	Yes	
Pb14	Yarralumla Preschool – Internal roof support beam	Yellow	No	

Sample ID	Sample Location	Paint Colour	Classified as Lead Paint?	Photograph(s)
Pb15	Yarralumla Preschool – Internal and external window frames, pergola frame and doors	Grey	No	

## Appendix 2 - Laboratory Results

### CERTIFICATE OF ANALYSIS 216357

#### Client Details

Client	Robson Environmental Pty Ltd
Attention	
Address	PO Box 112, Fyshwick, ACT, 2609

#### Sample Details

Your Reference	<u>T-01035</u>
Number of Samples	15 Paint
Date samples received	29/04/2019
Date completed instructions received	29/04/2019

#### Analysis Details

Please refer to the following pages for results, methodology summary and quality control data.

Samples were analysed as received from the client. Results relate specifically to the samples as received.

Results are reported on a dry weight basis for solids and on an as received basis for other matrices.

**Please refer to the last page of this report for any comments relating to the results.**

#### Report Details

Date results requested by	30/04/2019
Date of Issue	30/04/2019
NATA Accreditation Number	This document shall not be reproduced except in full.
Accredited for compliance with ISO/IEC 17025 - Testing. <b>Tests not covered by NATA are denoted with *</b>	

Results Approved By

Authorised By

Revision No: R00



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Client Reference: T-01035

Lead in Paint						
Our Reference		216357-1	216357-2	216357-3	216357-4	216357-5
Your Reference	UNITS	Pb01	Pb02	Pb03	Pb04	Pb05
Date Sampled		23/04/2019	23/04/2019	23/04/2019	23/04/2019	23/04/2019
Type of sample		Paint	Paint	Paint	Paint	Paint
Date prepared	-	29/04/2019	29/04/2019	29/04/2019	29/04/2019	29/04/2019
Date analysed	-	30/04/2019	30/04/2019	30/04/2019	30/04/2019	30/04/2019
Lead in paint	%w/w	0.29	0.090	0.19	0.82	0.26

Lead in Paint						
Our Reference		216357-6	216357-7	216357-8	216357-9	216357-10
Your Reference	UNITS	Pb06	Pb07	Pb08	Pb09	Pb10
Date Sampled		23/04/2019	23/04/2019	23/04/2019	23/04/2019	23/04/2019
Type of sample		Paint	Paint	Paint	Paint	Paint
Date prepared	-	29/04/2019	29/04/2019	29/04/2019	29/04/2019	29/04/2019
Date analysed	-	30/04/2019	30/04/2019	30/04/2019	30/04/2019	30/04/2019
Lead in paint	%w/w	<0.005	<0.005	0.32	0.01	<0.005

Lead in Paint						
Our Reference		216357-11	216357-12	216357-13	216357-14	216357-15
Your Reference	UNITS	Pb11	Pb12	Pb13	Pb14	Pb15
Date Sampled		23/04/2019	23/04/2019	23/04/2019	23/04/2019	23/04/2019
Type of sample		Paint	Paint	Paint	Paint	Paint
Date prepared	-	29/04/2019	29/04/2019	29/04/2019	29/04/2019	29/04/2019
Date analysed	-	30/04/2019	30/04/2019	30/04/2019	30/04/2019	30/04/2019
Lead in paint	%w/w	0.05	0.13	0.28	<0.005	<0.005

Revision No: R00

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Client Reference: T-01035

Method ID	Methodology Summary
Metals-004	Digestion of Paint chips/scrapings/liquids for Metals determination by ICP-AES/MS and or CV/AAS.

Revision No: R00

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Client Reference: T-01035

QUALITY CONTROL: Lead in Paint						Duplicate			Spike Recovery %	
Test Description	Units	PQL	Method	Blank	#	Base	Dup.	RPD	LCS-1	[NT]
Date prepared	-			29/04/2019	8	29/04/2019	29/04/2019		29/04/2019	
Date analysed	-			30/04/2019	8	30/04/2019	30/04/2019		30/04/2019	
Lead in paint	%w/w	0.005	Metals-004	<0.005	8	0.32	0.59	59	104	

QUALITY CONTROL: Lead in Paint						Duplicate			Spike Recovery %	
Test Description	Units	PQL	Method	Blank	#	Base	Dup.	RPD	[NT]	[NT]
Date prepared	-				12	29/04/2019	29/04/2019			
Date analysed	-				12	30/04/2019	30/04/2019			
Lead in paint	%w/w	0.005	Metals-004		12	0.13	0.12	8		

Revision No: R00



Client Reference: T-01035

Result Definitions	
<b>NT</b>	Not tested
<b>NA</b>	Test not required
<b>INS</b>	Insufficient sample for this test
<b>PQL</b>	Practical Quantitation Limit
<b>&lt;</b>	Less than
<b>&gt;</b>	Greater than
<b>RPD</b>	Relative Percent Difference
<b>LCS</b>	Laboratory Control Sample
<b>NS</b>	Not specified
<b>NEPM</b>	National Environmental Protection Measure
<b>NR</b>	Not Reported

Quality Control Definitions	
<b>Blank</b>	This is the component of the analytical signal which is not derived from the sample but from reagents, glassware etc, can be determined by processing solvents and reagents in exactly the same manner as for samples.
<b>Duplicate</b>	This is the complete duplicate analysis of a sample from the process batch. If possible, the sample selected should be one where the analyte concentration is easily measurable.
<b>Matrix Spike</b>	A portion of the sample is spiked with a known concentration of target analyte. The purpose of the matrix spike is to monitor the performance of the analytical method used and to determine whether matrix interferences exist.
<b>LCS (Laboratory Control Sample)</b>	This comprises either a standard reference material or a control matrix (such as a blank sand or water) fortified with analytes representative of the analyte class. It is simply a check sample.
<b>Surrogate Spike</b>	Surrogates are known additions to each sample, blank, matrix spike and LCS in a batch, of compounds which are similar to the analyte of interest, however are not expected to be found in real samples.
Australian Drinking Water Guidelines recommend that Thermotolerant Coliform, Faecal Enterococci, & E.Coli levels are less than 1cfu/100mL. The recommended maximums are taken from "Australian Drinking Water Guidelines", published by NHMRC & ARMC 2011.	

Revision No: R00

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Client Reference: T-01035

### Laboratory Acceptance Criteria

Duplicate sample and matrix spike recoveries may not be reported on smaller jobs, however, were analysed at a frequency to meet or exceed NEPM requirements. All samples are tested in batches of 20. The duplicate sample RPD and matrix spike recoveries for the batch were within the laboratory acceptance criteria.

Filters, swabs, wipes, tubes and badges will not have duplicate data as the whole sample is generally extracted during sample extraction.

Spikes for Physical and Aggregate Tests are not applicable.

For VOCs in water samples, three vials are required for duplicate or spike analysis.

Duplicates: >10xPQL - RPD acceptance criteria will vary depending on the analytes and the analytical techniques but is typically in the range 20%-50% – see ELN-P05 QA/QC tables for details; <10xPQL - RPD are higher as the results approach PQL and the estimated measurement uncertainty will statistically increase.

Matrix Spikes, LCS and Surrogate recoveries: Generally 70-130% for inorganics/metals; 60-140% for organics (+/-50% surrogates) and 10-140% for labile SVOCs (including labile surrogates), ultra trace organics and speciated phenols is acceptable.

In circumstances where no duplicate and/or sample spike has been reported at 1 in 10 and/or 1 in 20 samples respectively, the sample volume submitted was insufficient in order to satisfy laboratory QA/QC protocols.

When samples are received where certain analytes are outside of recommended technical holding times (THTs), the analysis has proceeded. Where analytes are on the verge of breaching THTs, every effort will be made to analyse within the THT or as soon as practicable.

Where sampling dates are not provided, [REDACTED] are not in a position to comment on the validity of the analysis where recommended technical holding times may have been breached.

Measurement Uncertainty estimates are available for most tests upon request.

Revision No: R00

Page 6 of 7

Client Reference: T-01035

#### Report Comments

Lead in Paint - The duplicate result is greater than the acceptable RPD. Re-analysis indicates possible sample heterogeneity.

Revision No: R00

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**Ebner, Joanne**

---

**From:** Ebner, Joanne  
**Sent:** Wednesday, 10 July 2019 2:38 PM  
**To:** Hunter, Stuart  
**Subject:** FW: Yarralumla Primary School - Clearance and Respirable Fibre Results  
**Attachments:** T01035\_YarralumlaPrimary School\_Pass\_Clearance\_Certificate\_20190709.pdf

UNCLASSIFIED

Hi Stuart

FYI

Jo

**From:** Byrne, Evan <Evan.Byrne@act.gov.au>  
**Sent:** Tuesday, 9 July 2019 2:53 PM  
**To:** Ebner, Joanne <Joanne.Ebner@act.gov.au>  
**Subject:** Fwd: Yarralumla Primary School - Clearance and Respirable Fibre Results

Jo,

See attached clearance certificate for work carried out today at Yarralumla Primary School.

Evan Byrne  
 Project Officer  
 ACT Property Group / Property Upgrades  
 Chief Minister, Treasury and Economic Development Directorate | ACT Government  
 M: 0411 183 771  
 E: [evan.byrne@act.gov.au](mailto:evan.byrne@act.gov.au)  
 255 Canberra Avenue, Fyshwick, ACT 2609  
 If you have any feedback for the ACT Property Group, please email [actpgfeedback@act.gov.au](mailto:actpgfeedback@act.gov.au)

---

**From:** [REDACTED]  
**Sent:** Tuesday, July 9, 2019 2:49:25 PM  
**To:** Byrne, Evan; [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Yarralumla Primary School - Clearance and Respirable Fibre Results

Hi Evan please find attached the clearance certificate and air monitoring results for the asbestos removal works carried out at Yarralumla Primary School. If you have any problems please feel free to give me a call.

Regards



Web: [www.robsonenviro.com.au](http://www.robsonenviro.com.au)

140 Gladstone St Fyshwick ACT 2609 ~ PO Box 112 Fyshwick ACT 2609

Best Practice Certification for AS/NZS ISO 9001:2008 - Quality ~ ISO 14001:2004 - OHS ~ AS/NZS 4801:2001 -  
Environment

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## ASBESTOS CLEARANCE CERTIFICATE INSPECTION PASS

**Project/Location:** Yarralumla Primary School  
**Job Number:** T-01035  
**Client:** ACT Property Group  
**Client Contact:** Evan Byrne  
**Time And Date Of Inspection:** 13:15 Tuesday, 9 July 2019  
**Date(s) And Description Of Work:** Removal of non-friable asbestos eave sheets from the After School Care Building and the Gambarri Preschool Building. Removal works commenced on 9 July 2019  
**Date of Report:** 9/07/2019  
**Asbestos Removalist:** [REDACTED]

### Certification:

A visual inspection was carried out on Tuesday, 9 July 2019, by [REDACTED] following the completion of the asbestos works listed above in accordance with Robson Environmental's NATA, ISO9001, ISO14001 and AS4801 accreditations. It should be noted that this clearance certificate relates only to the exact area(s) specified above.

The inspection found no visible asbestos residue from the asbestos work in the area or in the vicinity of the area where the work was carried out.

Air monitoring during the works returned results below the minimum practical detection limit of <0.01 F/mL. Refer to Appendix A for Photograph(s), Appendix B for Air Monitoring Results.

The work area has been given the "all clear" and restrictions associated with the asbestos works can now be lifted and the area safely reoccupied.

**Note: this only a partial removal of the non-friable asbestos eave sheets from the After School Care Building. The asbestos removal works will continue on 10 July 2019.**



WORLD RECOGNISED  
ACCREDITATION

No. 3181

Accredited for compliance  
with ISO/IEC 17020





Authorised by:



Licensed Asbestos Assessor



Assistant Manager Laboratory Services

Mobile:



**Appendix A – Photo(s)**




PHOTO NO	LOCATION DESCRIPTION	MATERIAL	PHOTOGRAPH
1	Removal of non-friable asbestos eave sheets from the After School Care Building.	sheet	
2	Removal of non-friable asbestos eave sheets from the After School Care Building.	sheet	

PHOTO NO	LOCATION DESCRIPTION	MATERIAL	PHOTOGRAPH
3	Removal of non-friable asbestos eave sheets from the After School Care Building.	sheet	



## Appendix B – Air Monitoring Results

Report Number: T-01035-20190709



# Respirable Fibre Estimation Test Report

Job Number: T-01035

Sampling Date: 9.07.2019

Report Issued: 9.07.2019

Monitoring Location: Yarralumla Primary School

Client Name & Address: ACT Property Group

Work in Progress: Removal of non-friable asbestos eave sheets from the After School Care Building and the Gambarri Preschool Building

Asbestos Removalist: [REDACTED]

Test Specification(s) Employed: NOHSC: Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres [NOHSC: 3003 (2005)], & In-House Procedure No. 1

Sample Number	Sampling Location	Time		Average Flowrate	Fields Counted	Fibres Counted	Airborne Fibre Concentration (fibres/mL)
		On	Off				
1	On sign post north east of removal area	0808	1320	2000	100	0	<0.01
2	On fence adjacent skip bins north west of removal area	0810	1320	2000	100	0	<0.01
3	On down pipe north of removal area	0818	1324	2000	100	1	<0.01
4	On covered walkway west of removal area	0820	1326	2000	100	0	<0.01
5	On sign post south of removal area	0823	1328	2000	100	0	<0.01
6	Field blank	-	-	-	100	0	-

The above results are only for the samples listed on this certificate

Field blanks and samples taken in direct flow of negative air units are reported as a fibre count only

The Detection Limit of the analytical method is 0.01 fibres/mL

The Work Health and Safety Act 2011 Control Level for all forms of asbestos is 0.01 fibres/mL

Safe Work Australia's recommended Exposure Standard for all forms of asbestos is 0.1 fibres/mL

[REDACTED]  
Robson Approved Signatory



No. 3181

[REDACTED]  
Robson Approved Counter

Accredited for compliance with ISO/IEC 17025 - Testing

The results of the tests, calibrations and/or measurements included in this document are traceable to Australian/national standards

Robson Environmental Pty Ltd ~ ABN: 55 008 660 900 ~ www.robsonenviro.com.au  
p: 02 6239 5656 ~ f: 02 6239 5669 ~ admin@robsonenviro.com.au  
PO Box 112 Fyshwick ACT 2609 ~ 140 Gladstone Street Fyshwick ACT 2609

Client: ACT Property Group

T01035\_AM\_Res\_20190709

**Ebner, Joanne**

---

**From:** Ebner, Joanne  
**Sent:** Wednesday, 10 July 2019 4:21 PM  
**To:** Hall, Jackie (ACTEDU); Evans, Rohan (ACTEDU)  
**Cc:** Hunter, Stuart; Wickham, Ilona  
**Subject:** FW: T01035 Yarralumla Primary School Pass Clearance Certificate 20190710  
**Attachments:** T01035\_YarralumlaPrimary School\_Pass\_Clearance\_Certificate\_20190710.pdf

UNCLASSIFIED

Hi Jackie and Rohan

Please find attached a copy of the Clearance Certificate associated with the removal of some asbestos eave sheets to the After School Care Building of Yarralumla Primary School.

I draw your attention to the following "Note" within the attached

*"Note: all specified non-friable asbestos eave sheets have been removed from the After School Care building. There are still high level non-friable asbestos eave sheets remaining to the front of the building.  
 ...."*

Please place a colour copy of the attached on the school's Hazardous Materials folder for future reference.

Regards

*Joanne Ebner*

Joanne Ebner | Project Officer  
 Phone: +61 2 6207 1050 | Fax: +61 2 6205 9333 | Email: [joanne.ebner@act.gov.au](mailto:joanne.ebner@act.gov.au)  
 Infrastructure and Capital Works | Education | ACT Government  
 Level 1 220 Northbourne Avenue | GPO Box 158 Canberra ACT 2601  
[www.education.act.gov.au](http://www.education.act.gov.au) | Facebook | Twitter | Instagram | LinkedIn | Google+

---

**From:** Byrne, Evan <[Evan.Byrne@act.gov.au](mailto:Evan.Byrne@act.gov.au)>  
**Sent:** Wednesday, 10 July 2019 4:07 PM  
**To:** Ebner, Joanne <[Joanne.Ebner@act.gov.au](mailto:Joanne.Ebner@act.gov.au)>  
**Subject:** Fwd: T01035 Yarralumla Primary School Pass Clearance Certificate 20190710

Jo,

See attached clearance for the work carried out today at Yarralumla Primary School.

Evan Byrne  
 Project Officer  
 ACT Property Group / Property Upgrades  
 Chief Minister, Treasury and Economic Development Directorate | ACT Government  
 M: 0411 183 771

E: [evan.byrne@act.gov.au](mailto:evan.byrne@act.gov.au)

255 Canberra Avenue, Fyshwick, ACT 2609

"If you have any feedback for the ACT Property Group, please email [actpgfeedback@act.gov.au](mailto:actpgfeedback@act.gov.au)

---

**From:** [REDACTED]

**Sent:** Wednesday, July 10, 2019 3:31:24 PM

**To:** Byrne, Evan

**Cc:** [REDACTED]

**Subject:** T01035 Yarralumla Primary School Pass Clearance Certificate 20190710

Hi Evan,

Please see the attached clearance certificate for the works completed today at Yarralumla Primary School.

Kind regards,  
[REDACTED]



Web: [www.robsonenviro.com.au](http://www.robsonenviro.com.au)

140 Gladstone St Fyshwick ACT 2609 ~ PO Box 112 Fyshwick ACT 2609

Best Practice Certification for AS/NZS ISO 9001:2008 - Quality ~ ISO 14001:2004 - OHS ~ AS/NZS 4801:2001 - Environment

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**ASBESTOS CLEARANCE CERTIFICATE  
INSPECTION PASS**

**Project/Location:** Yarralumla Primary School

**Job Number:** T-01035

**Client:** ACT Property Group

**Client Contact:** Evan Byrne

**Time And Date Of Inspection:** 13:15 Tuesday, 9 July 2019

**Date(s) And Description Of Work:** Removal of non-friable asbestos eave sheets from the After School Care Building and the Gambarri Preschool Building. Removal works commenced on 9 July 2019

**Date of Report:** 9/07/2019

**Asbestos Removalist:** [REDACTED]

**Certification:**

A visual inspection was carried out on Tuesday, 9 July 2019, by [REDACTED] following the completion of the asbestos works listed above in accordance with Robson Environmental's NATA, ISO9001, ISO14001 and AS4801 accreditations. It should be noted that this clearance certificate relates only to the exact area(s) specified above.

The inspection found no visible asbestos residue from the asbestos work in the area or in the vicinity of the area where the work was carried out.

Air monitoring during the works returned results below the minimum practical detection limit of <0.01 F/mL. Refer to Appendix A for Photograph(s), Appendix B for Air Monitoring Results.

The work area has been given the "all clear" and restrictions associated with the asbestos works can now be lifted and the area safely reoccupied.

**Note: this only a partial removal of the non-friable asbestos eave sheets from the After School Care Building. The asbestos removal works will continue on 10 July 2019.**



WORLD RECOGNISED  
**ACCREDITATION**

No. 3181

Accredited for compliance  
with ISO/IEC 17020



Authorised by:



Appendix A – Photo(s)



PHOTO NO	LOCATION DESCRIPTION	MATERIAL	PHOTOGRAPH
1	Removal of non-friable asbestos eave sheets from the After School Care Building.	sheet	
2	Removal of non-friable asbestos eave sheets from the After School Care Building.	sheet	

PHOTO NO	LOCATION DESCRIPTION	MATERIAL	PHOTOGRAPH
3	Removal of non-friable asbestos eave sheets from the After School Care Building.	sheet	