

Confined Space Assessment

Tower 2

727 Collins Street, Docklands, Victoria

Collins Square
January 2020

Client No: C0338

Job No: 33688

Statement of Limitations

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Reliance on Information Provided by Others

Prensa notes that where information has been provided by other parties in order for the works to be undertaken, Prensa cannot guarantee the accuracy or completeness of this information. Prensa does not warrant the accuracy or completeness of this information and does not accept liability arising from inaccuracies or omissions in information provided to Prensa by third parties. No indications were found during our investigations that information contained in this report, as provided to Prensa, is false.

Recommendation for Further Study

The industry recognised methods used in undertaking the works may dictate a staged approach to specific investigations. The findings therefore of this report may represent preliminary findings in accordance with these industry recognised methodologies. In accordance with these methodologies, recommendations contained in this report may include a need for further investigation or analytical analysis. The decision to accept these recommendations and incur additional costs in doing so will be at the sole discretion of Collins Square and Prensa recognises that Collins Square will consider their specific needs and the business risks involved. Prensa does not accept any liability for losses incurred as a result of Collins Square not accepting the recommendations made within this report.

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1 Introduction

Prensa Pty Ltd (Prensa) was engaged by Collins Square to undertake a Confined Space Assessment (CSA) of Tower 2 located at 727 Collins Street, Docklands, Victoria (the Property). The CSA was undertaken by Prensa on Tuesday 14th January 2020 with the assistance of Nathan Earl, Senior Facilities Manager for Collins Square.

The CSA has been conducted in accordance with the State based *Work / Occupational Health and Safety Regulations*, Codes of Practice and Australian Standard (AS) 2865 - 2009, *Confined Spaces* to assist Collins Square with its legislative obligation to identify hazards to health and/or safety associated with work in confined spaces.

2 Scope of Works

The scope of the CSA was defined by Collins Square and covered areas under the management of Collins Square at the Property.

Tenant managed confined spaces are excluded from the scope of works.

3 Methodology

The following documents were referred to when completing the CSA:

- Relevant State Work/Occupational Health and Safety Acts and Regulations (WHS/OHS Acts/Regulations);
- Relevant State Codes of Practice for Confined Spaces;
- AS 2865 - 2009, Confined Spaces;
- Model Code of Practice: Confined Spaces October 2018; and
- Applicable Collins Square confined space management procedures.

The CSA was undertaken in accordance with the above and through:

- Discussions with relevant Collins Square personnel and site contacts;
- A visual inspection of areas managed by Collins Square at the Property, in order to identify confined spaces present;
- Identification of the potential hazards and current risk controls (e.g. security, signage) associated with those confined spaces; and
- Documentation and compilation of the findings, including preparation of a confined spaces register.

4 Identification of Confined Spaces

4.1 Definition of a Confined Space

A **Confined Space** is defined as an enclosed or partially enclosed space which:

- Is not designed or intended primarily to be occupied by a person; AND
- Is, or is designed or intended to be, at normal atmospheric pressure while any person is in the space; AND
- Is, or is likely to be a risk to health and safety from:
 - An atmosphere that does not have a safe oxygen level; OR
 - Contaminants, including flammable airborne gases, vapours and dusts that may cause injury from fire or explosion; OR
 - Harmful concentrations of any airborne contaminants; OR
 - Engulfment.

The above description is hereafter referred to as the Confined Space Criteria.

4.2 Register of Confined Spaces

To enable persons accessing the Property to be aware of the confined spaces present, a Register of Confined Spaces has been prepared and is included as **Appendix A**. The Register of Confined Spaces contains the following information:

- Location of the confined space;
- Type of confined space (e.g. tank, sewer pit, stormwater drain);
- Method(s) used to secure the confined space from unauthorised access;
- Confined Space Criteria deemed applicable; and
- A photograph of the confined space.

The Confined Space Register has been designed to facilitate the identification of those spaces that should be classified as a "confined space", by both the person who has control or management of the site as well as persons who may be accessing the Site.

4.3 Provision of Confined Space Labelling

While there is no legislative duty to install confined space signage for non-entry situations, it is the intent of Collins Square to manage the potential confined space entry risk through such signs.

Signage should be durable and weather resistant and used to notify that entry should not take place unless a Confined Space Permit has been obtained. Signage is also used to:

- Communicate to contractors that the area presents a specific risk; and
- Reduce the risk of unauthorised entry.

Examples of signage to notify of confined spaces are as follows:



Where labelling is impractical e.g. for aesthetic reasons, the method of identification will be via use of this confined space register.

4.4 Limitations

The ability to identify confined spaces during this CSA was limited to information provided by Collins Square and a visual inspection of reasonably accessible areas at the Property. Due to the absence of a plumber during the inspection, spaces were assessed against the Confined Space Criteria based only on information provided by Collins Square representatives and assumptions made based on the surrounding use of the spaces, markings on gatic covers, etc. It is noted that, where potential confined spaces were unable to be accessed (for example, due to sealed gatic covers), these have been classified as 'suspected confined spaces' and included in the confined space register provided in **Appendix A**).

5 Risk Assessment

A risk assessment must be conducted by a competent person or persons before conducting any tasks associated with a confined space, in accordance with AS 2865, *Confined Spaces*, 2009. In order to adhere to this requirement, risk assessments are to be completed by contractors accessing confined spaces at the Property prior to entry.

6 Hierarchy of Controls

Prensa has utilised the hierarchy of control in order to rank confined space hazards and subsequent recommendations. The State based WHS / OHS Regulations require that duty holders utilise the most effective method to eliminate or minimise risk, taking into consideration what is reasonably practicable. The hierarchy of control deems the elimination of risk as being the highest level of control, for example, eliminating the need to enter a confined space. The lowest level of control is the utilisation of administrative controls and PPE.

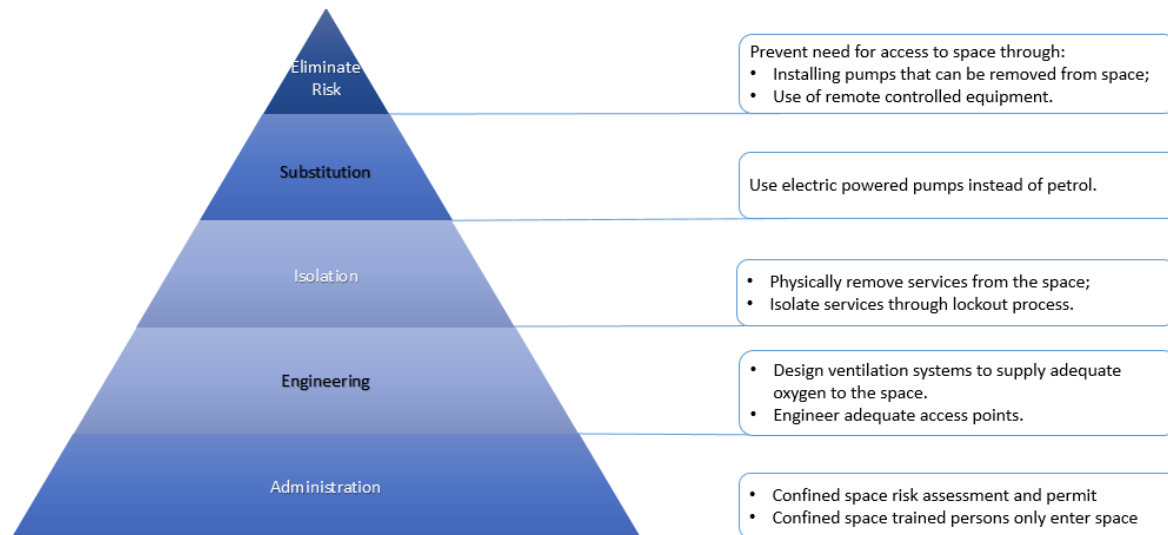


Figure 1 – Hierarchy of Control

7 Entry into Confined Spaces

Where entry to a confined space cannot be avoided, a representative of Collins Square should undertake the following prior to entry:

- Review risk assessments completed by the contractor prior to entering the confined space;
- Review risk controls planned by the contractor; and
- Review the contractor training and competency record.

As the duty holder (Person Conducting a Business or Undertaking, Employer, etc.) in control of the confined space, it is also necessary to ensure that any contractor requiring entry to a confined space at the Property:

- Provides evidence of compliance with Collins Square confined space entry and documentation requirements, as follows:
 - Prior to entry to a confined space the contractor MUST:
 - Document a site-specific confined space entry risk assessment;
 - Document a safe work method statement (or equivalent);
 - Document emergency rescue arrangements; and
 - Complete a confined space permit that is, as a minimum equal to, or better than the permit to work approved for use by Collins Square.
 - During entry to a confined space the contractor MUST:
 - Allocate a stand-by person, who is able to remain for the duration of entry;
 - Monitor the atmosphere within the confined space;

- Provide equipment necessary for the initiation of emergency response and rescue of persons from the confined space; and
- Provide signage and barricading.
- At the completion of works the contractor MUST:
 - Ensure all equipment taken into the confined space is removed and accounted for;
 - Replace any access locks / pit lids as necessary to prevent entry by unauthorised persons;
 - Provide completed confined space entry permit to Collins Square; and
 - Remove signage and barricading.

7.1 Information, Instruction and Training

Evidence of training in confined space entry must be reviewed for the persons entering a confined space and the person acting in the stand-by role. This should include retaining copies of training on file for future reference. This should include demonstrating competencies in nationally recognised courses such as:

- RIIWHS202D - Enter and work in confined spaces;
- MSMPER205 - Enter confined space;
- MSMPER200 - Work in accordance with an issued permit;
- MSMPER202 - Observe permit work, etc.

7.2 Confined Space Entry Permits

Collins Square must ensure that a confined space entry permit is issued for each confined space entry and must:

- Be in writing;
- Identify the confined space;
- Clearly describe the work to be carried out in or on the confined space;
- Set out measures to control risks for the confined space;
- Record the names of all persons who may enter or work in or on the confined space; and
- Record the dates and times when the persons may enter or be in or on the confined space to carry out the work.

7.3 Record Keeping

The following records should be retained by Collins Square:

- Confined space register for the Property;
- Where entry is required to a confined space:
 - Copy of pre-entry risk assessment conducted by the contractor entering the space;
 - Copy of the SWMS defining risk controls prior to work being undertaken;
 - Copies of completed confined space permits;
 - Records of training in confined space entry; and
 - Records of review of contractor documents.

8 Findings

A Register of Confined Spaces is contained within **Appendix A** of this report.

Confined spaces of the following types were identified:

Type of Confined Space identified at the Site
Stormwater pit > 1.5m
Grease traps
Sewer pit
Rain water tanks
Domestic water tank

At the time of the inspection most of the confined spaces were physically secured through the use of gatic covers, metal covers and metal hatches. In addition, it was noted that all of the identified confined spaces were located in rooms that were secured from unauthorised access via the use of lock and key. However, it was noted that the entry hatch for the rainwater tank (RWT-02) located within the Level B2 Tank Room had lifted and was not secured.

It was noted that the three (3) rain water tanks (RWT-01, RWT-02, and RWT-03), domestic water tank (DWT-01) and two (2) grease traps (GT-01 and GT-02) were provided with labelling stating 'Danger – Confined Space, entry by permit only'. None of the other confined spaces identified were provided with labelling.

9 Recommendations

Prensa recommends the following in order to further reduce the risk associated with the management of confined spaces risks at the Property:

- Level B2 Tank Room - Secure the hatch to the rain water tank (RWT-02); and
- Affix permanent labelling stating 'Danger – Confined Space, entry by permit only' to the unlabelled confined spaces detailed in **Appendix A**.

Appendix A: Register of Confined Spaces

Property: Tower 2, Collins Square
 Completed by: Jennifer McFee and Luke Bonifacio (Prensa)
 Date of first inspection: 14/01/2020
 Register last updated: 15/01/2020
 Prepared for: Nathan Earl (Collins Square)

Space ID	Type of Confined Space	Location	Security of Access / Type of cover	CONFINED SPACE CRITERIA							Photograph of Confined Space	Photograph of Confined Space location
				A	B	C	D					
				Is the space an enclosed or partially enclosed space?	Is the space not designed or intended primarily to be occupied by a person?	Is the space designed or intended to be at normal atmospheric pressure while any person is in the space?	Does the space present a risk from:					
							At an atmosphere that does not have a safe oxygen level?	Contaminants (including airborne gases, vapours or dusts) that may cause injury from fire or explosion?	Harmful concentrations of airborne contaminants?	Flooding/engulfment?		
SP-01	Sewer Pit	Level B2 Tank Room	Gatic Cover	Y	Y	Y	Y	Y	Y	Y		
SWP-01	Stormwater Pit	Level B2 Tank Room	Gatic Cover	Y	Y	Y	N	N	N	Y		
GT-01	Grease Trap	Level B2 Tank Room	Metal Cover	Y	Y	Y	Y	Y	Y	Y		
GT-02	Grease Trap	Level B2 Tank Room	Metal Cover	Y	Y	Y	Y	Y	Y	Y		
RWT-01	Rain Water Tank	Level B2 Tank Room	Metal Hatch	Y	Y	Y	N	N	N	Y		
RWT-02	Rain Water Tank	Level B2 Tank Room	Metal Hatch	Y	Y	Y	N	N	N	Y		
DWT-01	Domestic Water Tank	Level 26 - Storage Room	Metal Hatch	Y	Y	Y	N	N	N	Y		
RWT-03	Rain Water Tank	Level 38 - Plant Room	Metal Hatch	Y	Y	Y	N	N	N	Y		

Appendix B: Photographs



1. Level B2 Tank Room – Metal hatch to the rainwater tank (RWT-02) was noted to be lifted.