

Confined Space Assessment Tower Five, 727 Collins Street Melbourne, Victoria

Collins Square Management
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Recommendations 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 Management and Prensa recognises that that Collins Square Management 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 Management not accepting the recommendations made within this report.

Table of Contents

1	Introduction	1
2	Scope of Works	1
3	Methodology.....	1
4	Identification of Confined Spaces	1
4.1	Definition of a Confined Space.....	1
4.2	Register of Confined Spaces.....	2
4.3	Limitations.....	2
5	Entry to Confined Spaces	2
5.1	Information, Instruction and Training.....	3
5.2	Confined Space Entry Permits.....	3
5.3	Confined Space Risk Assessments	3
5.4	Record Keeping	3
6	Findings	3
7	Recommendations	4
	Appendix A: Register of Confined Spaces	I

1 Introduction

Prensa Pty Ltd (Prensa) was engaged by Collins Square Management to undertake a Confined Space Assessment (CSA) of Tower Five of Collins Square located at Tower Five, 727 Collins Street, Melbourne, Victoria (the Property). The CSA was undertaken by Daniel Hills of Prensa on Wednesday 23rd January 2019 with the assistance of Jack Gardner, Facilities Manager and Paul Hiller Facilities Supervisor for Collins Square Management.

The CSA has been conducted in accordance with the Victorian *Occupational Health and Safety Regulations, 2017*, and Australian Standard (AS) 2865, *Confined Spaces, 2009*, to assist Collins Square Management 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 Management and covered areas under the management of Collins Square Management at the Property.

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

3 Methodology

The following reference documents were referred to when completing the CSA:

- Victorian *Occupational Health and Safety Regulations, 2017*;
- AS 2865, *Confined Spaces, 2009*;
- Victorian Compliance Code – Confined Spaces, March 2018; and
- Applicable Collins Square Management confined space management procedures.

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

- Discussions with relevant Collins Square Management personnel and site contacts;
- A visual inspection of areas managed by Collins Square Management 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

An area was considered to be a confined space if it was enclosed or partially enclosed and:

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

- Harmful concentrations of any airborne contaminants; or
- Flooding/engulfment.

The above items are hereafter referred to as the Confined Space Criteria.

It is noted that the adopted Confined Spaced Criteria differs from the *Victorian Occupational Health & Safety Regulations 2017*. Where there is a difference, a space has been considered to be a confined space if it either meets the Confined Space Criteria or the definition within the regulations.

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

It is detailed within Collins Square Management Confined Space Management Procedure that all confined spaces must be labelled where practicable using a durable and weather resistant label to notify that entry should not take place unless a Confined Space Permit has been obtained.

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 Management 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 Management representatives; and
- Assumptions made based on the surrounding use of the spaces, markings on gatic covers, etc.

5 Entry to Confined Spaces

Prensa recommends completion of the following prior to entry into a confined space:

- Review of risk assessment / SWMS completed by the person entering the confined space;
- Review of planned risk controls;
- Review of training records;
- A confined space entry permit;
- Provision of a standby person, who is able to remain for the duration of entry;
- Provision of signs and protective barriers to prevent unauthorised access;

- Monitoring of atmospheres within confined spaces; and
- Arrangements for the initiation of emergency response and, where necessary, rescue of persons from the confined space.

At the completion of works within the confined space, signage and barricading should be removed and the confined space permit signed off by the contractor.

5.1 Information, Instruction and Training

Evidence of training in confined spaces entry must be reviewed for the persons entering a confined space at the Property. Such records should also be reviewed for the stand by person as well.

5.2 Confined Space Entry Permits

Employers 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.

5.3 Confined Space Risk Assessments

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.

5.4 Record Keeping

The following records should be retained by Collins Square Management:

- Confined space register for the Property; and
- Where entry is required to a confined 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 SWMS.

6 Findings

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

Confined spaces of the following types were identified:

- Water tanks;
- An above ground diesel tank;
- A gross pollution tank;
- A sewer pit; and
- Suspected confined spaces.

Access to the identified confined spaces was restricted through the use of sealed gatic covers, locked doors and sealed hatches.

Labelling stating ‘Danger, Confined Space, Entry By Permit Only’ was observed to be provided to DWT-01. However, the majority of the identified confined spaces listed in **Appendix A** were observed to not be adequately labelled to communicate the need for authorization prior to entry.

Several plant rooms and air plenums were observed to be provided with confined space labelling (**Photos 1 and 2**), however, were noted to not meet the definition of confined space as defined in **Section 4.1**.

A review of Collins Square’s *Occupational Health, Safety and Environmental Guidelines for Tenants, Retailers and Contractors* detailed that a permit is required prior to entry to a confined space.

Discussions with the Facilities Manager detailed that no confined space entry had been required at the Property during their tenure.



Photo 1. Lower Ground Car Park – Air Plenum observed to be incorrectly labelled as a confined space.

Photo 2. Ground Floor – Plant Room observed to be incorrectly labelled as a confined space.

7 Recommendations

The following recommendations are raised in order to further reduce the risk associated with the management of confined spaces risks at the Property:

- Provide permanent labelling stating ‘Danger – Confined Space, entry by permit only’ to the confined spaces listed in **Appendix A**;
- Confirm the nature of the suspected confined spaces (SCS-01 to SCS-10) at the time of next opening, and update the register provided in **Appendix A** accordingly. Also provide confined spaces labelling where a suspected confined space is confirmed to meet the confined space criteria; and
- Remove the confined space labelling from the Air Plenums and Plant Rooms.

Appendix A: Register of Confined Spaces

Property: Tower 5 - 727 Collins Street
 Completed by: Daniel Hills (Prensa)
 Date of first inspection: 23/01/2019
 Register last updated: 5/02/2019
 Prepared for: Collins Square Management

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:					
							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?		
DT-01	Diesel Tank	Lower Ground - Diesel Tank Room	Metal hatch, also located in a secured plant room	Y	Y	Y	Y	Y	Y	Y		
DCWT-01	Domestic Water Tank	Lower Ground - Pump Filtration/DCW Tank Room	Metal hatch, also located in a secured plant room	Y	Y	Y	N	N	N	Y		
DWT-01	Domestic Water Tank	Ground - Cleaner's Store Room	Locked Door	Y	Y	Y	N	N	N	Y		
DWT-02	Domestic Water Tank	Level 8 - Plant Room	Locked hatch, also located in secured fire pump room	Y	Y	Y	N	N	N	Y		
GPT-01	Gross Pollution Tank	Lower Ground - Car park	Secured metal hatch	Y	Y	Y	Y	N	N	Y		
SCS-01	Suspected Confined Space - Stormwater Pit	Lower Ground - Adjacent car park 500	Sealed gatic cover	Confirm nature of space at time of next opening.								
SP-01	Sewer Pit	Lower Ground - Adjacent lift	Sealed gatic cover	Y	Y	Y	Y	Y	Y	Y		
SCS-02	Suspected Confined Space - Stormwater Pit	Lower Ground - Adjacent car park 508	Sealed gatic cover	Confirm nature of space at time of next opening.								
SCS-03	Suspected Confined Space - Stormwater Pit	Lower Ground - Adjacent car park 508	Sealed gatic cover	Confirm nature of space at time of next opening.								
SCS-04	Suspected Confined Space - Stormwater Pit	Lower Ground - Adjacent car park 507	Sealed gatic cover	Confirm nature of space at time of next opening.								
SCS-05	Suspected Confined Space - Stormwater Pit	Lower Ground - Car park	Sealed gatic cover	Confirm nature of space at time of next opening.								
SCS-06	Suspected Confined Space - Stormwater Pit	Lower Ground - Car park	Sealed gatic cover	Confirm nature of space at time of next opening.								
SCS-07	Suspected Confined Space - Stormwater Pit	Lower Ground - Adjacent Lift	Sealed gatic cover	Confirm nature of space at time of next opening.								
SCS-08	Suspected Confined Space - Stormwater Pit	Lower Ground - Car park	Sealed gatic cover	Confirm nature of space at time of next opening.								

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 a normal atmospheric pressure while any person is in the space?	Does the space present a risk from:				
							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?		
SCS-09	Suspected Confined Space - Stormwater Pit	Lower Ground - Adjacent ramp from Ground Level	Sealed gatic cover	Confirm nature of space at time of next opening.							
SCS-10	Suspected Confined Space - Stormwater Pit	Lower Ground - Pump Filtration/DCW Tank Room	Sealed gatic cover	Confirm nature of space at time of next opening.							