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Confined Space Assessment

Tower 4, Parramatta Square Complex

Parramatta NSW 2150

Walker Corporation

June 2020

Client No: W0045

Job No: 61281

Statement of Limitations

This document has been prepared in response to specific instructions from Walker Corporation to whom the report has been addressed. The work has been undertaken with the usual care and thoroughness of the consulting profession. The work is based on accepted standards, practices of the time the work was undertaken. No other warranty, expressed or implied, is made as to the professional advice included in this report.

The report has been prepared for the use by Walker Corporation and the use of this report by other parties may lead to misinterpretation of the issues contained in this report. To avoid misuse of this report, Prensa advise that the report should only be relied upon by Walker Corporation and those third parties where the purposes for which the third parties intend to use the report are the same as those of Walker Corporation. The report should not be separated or reproduced in part and Prensa should be retained to assist other professionals who may be affected by the issues addressed in this report to ensure the report is not misused in any way.

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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 Walker Corporation and Prensa recognises that Walker Corporation will consider their specific needs and the business risks involved. Prensa does not accept any liability for losses incurred as a result of Walker Corporation not accepting the recommendations made within this report.

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Appendix A: Register of Confined Spaces

1 Introduction

Prensa Pty Ltd (Prensa) was engaged by Walker Corporation to undertake a Confined Space Assessment (CSA) of Tower 4 at the Parramatta Square Complex Parramatta NSW 2150 (the Property). The CSA was undertaken by Prensa on Monday 1st June 2020 with the assistance of Tony Trajceski, Senior Facilities Manager for Walker Corporation.

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 Walker Corporation 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 Walker Corporation and covered areas under the management of Walker Corporation at the Property.

It is noted a section of the Level B1, located adjacent to loading dock 4, was under development and therefore excluded from this Assessment.

3 Methodology

The following documents were referred to when completing the CSA:

- NSW *Work Health and Safety Act* 2011;
- NSW *Work Health and Safety Regulation* 2017;
- SafeWork NSW *Code of Practice*, *Confined Spaces*, August 2019;
- AS 2865 - 2009, *Confined Spaces*; and
- Applicable Colliers confined space management procedures.

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

- Discussions with relevant Walker Corporation personnel and site contacts;
- A visual inspection of areas managed by Walker Corporation 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 Walker Corporation 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 Walker Corporation 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 Walker Corporation 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 - 2009, *Confined Spaces*. 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 NSW *Work Health and Safety Regulation* 2017 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.

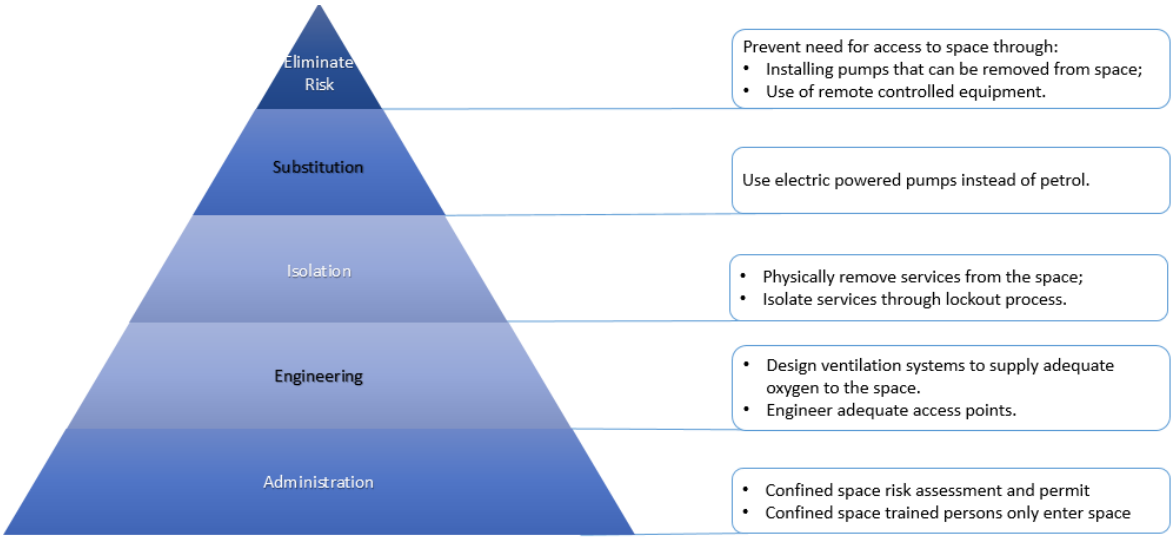


Figure 1 – Hierarchy of Control

7 Entry into Confined Spaces

Where entry to a confined space cannot be avoided, a representative of Walker Corporation 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 Walker Corporation 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 Walker Corporation.
- 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 Walker Corporation; 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; and
- MSMPER202 - Observe permit work, etc.

7.2 Confined Space Entry Permits

Walker Corporation 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 Walker Corporation:

- 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
Potable Water Tank
Rain Water Tank
Fire Water Tanks
Grease traps
Onsite Stormwater Detention (OSD) Tank
Sewage Holding Tank
Diesel Above-ground Storage Tank (AST)

Two (2) suspected confined spaces (detailed in **Appendix A**) were also identified during the inspection. Based on the location of these spaces, they were suspected to be associated with the fire water tanks. However, this should be confirmed upon next inspection.

At the time of the inspection, the following was noted:

- Inspected spaces were physically secured through the use locked doors, metal covers or access hatches;
- With the exception of the Level 19 rainwater tank and the Level B3 Diesel Above-ground Storage Tank (AST), inspected confined spaces were not labelled with 'Danger – Confined Space, Entry by Permit Only', or similar;
- It is noted that the AESC report labelled '*Property Risk Assessment – 12 Darcy Street Parramatta*' identified the following as confined spaces:
  - Level 1, plant room, electrical pit; and
  - Level 1, electrical switchroom, service pits.

However, electrical and service pits are considered unlikely to pose an increased risk to health and safety from the following:

- 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
- Engulfment.

As such, electrical and service pits do not meet the definition of a Confined Space. However, it is acknowledged that these spaces may become a Confined Space in the event that introduced hazards

result in the above-listed risks occurring (e.g. painting, welding, etc.). As such, a risk assessment should be completed by the contractor intending to work within the space prior to entry.

9 Recommendations

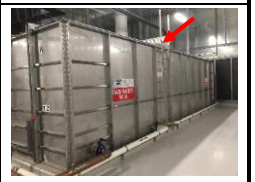
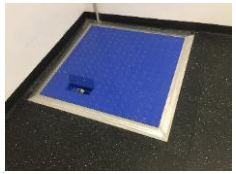
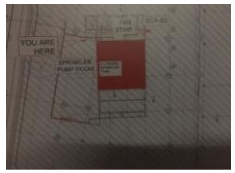
The following recommendations are raised in order to further reduce the risk associated with the management of confined spaces risks at the Property:

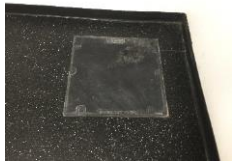
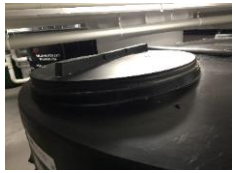
- Provide permanent labelling stating 'Danger – Confined Space, entry by permit only' to the confined spaces detailed in **Appendix A**; and
- Confirm the nature of the suspected confined spaces (SCS-01 and SCS-02) at the time of next opening, and update the register provided in **Appendix A** accordingly.

Appendix A: Register of Confined Space

APPENDIX A - Register of Confined Spaces

Property: Tower 4, Parramatta Square Complex, Parramatta NSW 2150
Date of first inspection: 1/06/2020
Prepared for: Walker Corporation

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					
							Does the space present a risk from:					
				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?	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?		
WT-01	Potable Water Tank	Level 34, Cooling Tower Area	Two (2) metal access hatches, located within secured plant room	Y	Y	Y	N	N	N	Y		
WT-02	Rain Water Tank	Level 19, Plant Room	Two (2) metal access hatches, located within secured plant room	Y	Y	Y	N	N	N	Y		
WT-03	Onsite Stormwater Detention (OSD) Tank	Level 1, AHU Plant Room	Bolted metal acess hatch, located in secured plant room	Y	Y	Y	N	N	N	Y		
FWT-01, FWT-02	Fire Water Tank	Level B1, End of Trip Facilities	Two (2) Secured metal hatches	Y	Y	Y	N	N	N	Y		

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					
							Does the space present a risk from:					
				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?	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?		
SCS-01, SCS-02	Suspected Confined Space - Fire Water Tanks	Level B1, End of Trip Facilities	Two (2) concrete access hatches	Confirm nature of space at time of next opening.								
GT-01, GT-02, GT-03, GT-04	Grease Trap	Level B3 , Grease Arrestor Room	Plastic access hatches, within secured room	Y	Y	Y	Y	Y	Y	Y		
ST-02	Sewage Holding Tank	Level B3, Stormwater Pump Room	Plastic access hatch, within secured room	Y	Y	Y	Y	Y	Y	Y		
DT-01	Diesel Tank	Level B3, Fuel Tank Room	Bolted metal access hatch, located in secured room	Y	Y	Y	Y	Y	Y	Y		