

Confined Space Assessment
6 & 8 Parramatta Square
12 Darcy Street, Parramatta NSW 2150

Walker Corporation
July 2022

Client No: W0045
Job No: 101993S

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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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 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 6 & 8 Parramatta Square located at 12 Darcy Street, Parramatta NSW 2150 (the Property). The CSA was undertaken by Prensa on Tuesday 28th June 2022 with the assistance of Nathan Balzan, Facilities Supervisor for Walker Corporation.

2 Objectives

The objectives of the CSA were to:

- Establish the current level of risk and compliance at the Property in relation to confined spaces, in general accordance with the relevant legislation, regulations, codes of practice/compliance codes and Australian Standards;
- Provide practical recommendations to rectify identified non-compliances associated with confined spaces (if any) and reduce the risk where deemed appropriate; and
- Present the findings in a concise and usable form, in order to assist Walker Corporation in effective and ongoing risk management at the Property.

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

4 Methodology

The CSA was undertaken in accordance with the following methodology:

- 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.

5 Technical Framework

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/Compliance Code for Confined Spaces;
- AS 2865 – 2009, Confined Spaces; and
- Model Code of Practice: *Confined Spaces* July 2020;

6 Identification of Confined Spaces

6.1 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.

6.2 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.

6.3 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.

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



Figure 1: Examples of Confined Space Signage

6.4 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.

7 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.

8 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.

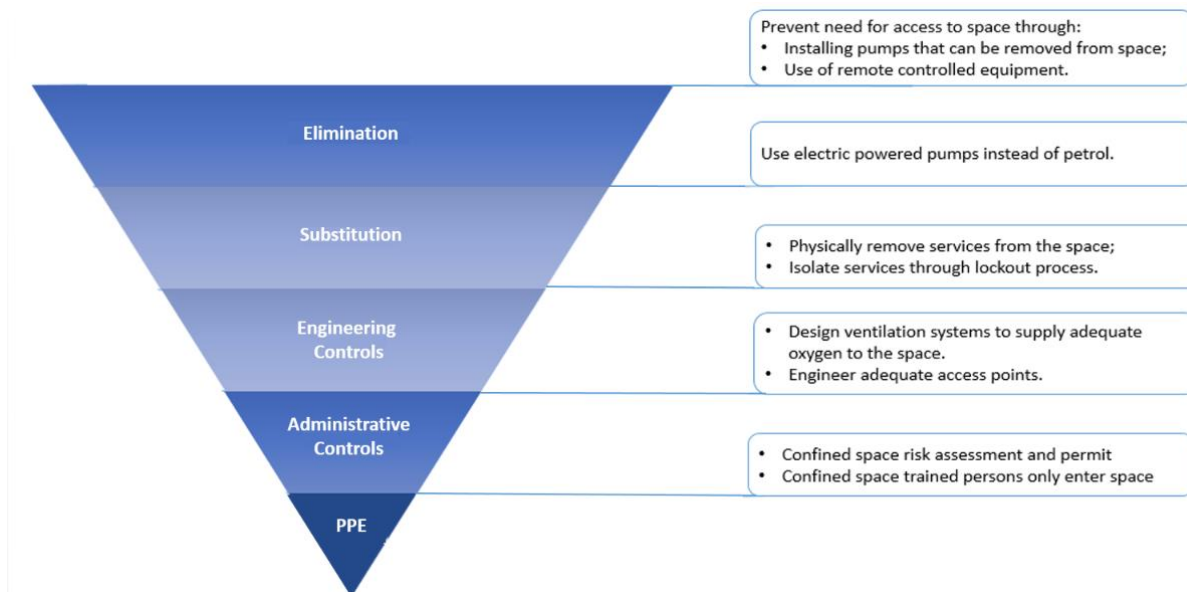


Figure 2: Hierarchy of Controls

9 Entry into Confined Spaces

Where entry to a confined space cannot be avoided, a representative of Walker Corporation must undertake the following prior to allowing a contractor to enter the confined space:

- 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.

9.1 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.*

9.2 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.

9.3 Record Keeping

The following records should be retained by Walker Corporation:

- Confined space register for the Property; and
- 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.

10 Findings

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

Confined spaces of the following types were identified:

Table 1: Types of Confined Space Identified at the Property	
Diesel Tank	Fire Water Tank
Sewer Pump Station	Rain Water Tank
Grease Trap	Transfer Water Tank
Sewer Sump/Retention Tank	Sewage Holding Tank
Potable Water Tank	

At the time of the inspection the following was noted:

- Inspected spaces were physically secured through the use of locked doors, sealed hatches and full metal hatches; and
- The following confined spaces were observed to not be provided with confined space labelling:
 - Transfer Water Tank (TWT-01);
 - Sewer Sump / Retention Tank (SST-01 to SST-02);
 - Sewer Pump Station (SPS-01);
 - Sewage Holding Tank (ST-01 to ST-02);
 - Grease Traps (GT-01 to GT-03); and
 - Diesel Tank (DT-01 to DT-03).

11 Recommendations







The following recommendation is raised in order to further reduce the risk associated with the management of confined spaces at the Property:

- Provide permanent labelling stating ‘Danger – Confined Space, Entry by Permit Only’ or similar to the following confined spaces:
 - Transfer Water Tank (TWT-01);
 - Sewer Sump / Retention Tank (SST-01 to SST-02);
 - Sewer Pump Station (SPS-01);
 - Sewage Holding Tank (ST-01 to ST-02);
 - Grease Traps (GT-01 to GT-03); and
 - Diesel Tank (DT-01 to DT-03).
- Prensa recommends that this CSRA report made be accessible to contractors.

Appendix A: Register of Confined Spaces

Property: 6 & 8 Parramatta Square - 12 Darcy Street, Parramatta NSW 2150
 Completed by: Prensa
 Date of first inspection: 28/06/2022
 Register last updated: 28/06/2022
 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 Is the space an enclosed or partially enclosed space?	B Is the space not designed or intended primarily to be occupied by a person?	C Is the space designed or intended to be at normal atmospheric pressure while any person is in the space?	D 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?		
FWT-01, FWT-02	Fire Water Tank	Tower 8, Level 51, Cooling Tower Plant Room, South East Corner	Metal hatch, Within Secured Plant Room	Y	Y	Y	N	N	N	Y		
RWT-01	Rain Water Tank	Tower 8, Level 51, South West Corner	Metal hatch, Within Secured Plant Room	Y	Y	Y	N	N	N	Y		
PWT-01, PWT-02	Potable Water Tank	Tower 8, Level 51, North West Corner	Metal hatch, Within Secured Plant Room	Y	Y	Y	N	N	N	Y		
FWT-03, FWT-04	Fire Water Tank	Tower 6, Level 26M, Combined Hydrant & Sprinkler Tank Room	Metal hatch, Within Secured Plant Room	Y	Y	Y	N	N	N	Y		
RWT-02	Rain Water Tank	Tower 6, Level 26 Plant Room	Metal hatch, Within Secured Plant Room	Y	Y	Y	N	N	N	Y		
PWT-03, PWT-04	Potable Water Tank	Tower 6, Level 26 Plant Room	Metal hatch, Within Secured Plant Room	Y	Y	Y	N	N	N	Y		
TWT-01	Transfer Water Tank	Tower 6, Level 26, Transfer Pump Room	Sealed Hatch, Within Secured Plant Room	Y	Y	Y	N	N	N	Y		
GT-01	Grease Trap	Level B1, Grease Arrestor Room	Sealed Hatch, Within Secured Plant Room	Y	Y	Y	Y	Y	Y	Y		
GT-02, GT-03	Grease Trap	Level B1, Water Pump Room	Sealed Hatch, Within Secured Plant Room	Y	Y	Y	Y	Y	Y	Y		
GT-04	Grease Trap	Level B2, Grease Arrestor Room	Sealed Hatch, Within Secured Plant Room	Y	Y	Y	Y	Y	Y	Y		
SST-01	Sewer Sump / Retention Tank	Level B2, Adjacent Carpark Space 176	Sealed Hatch	Y	Y	Y	Y	Y	Y	Y		
SPS-01	Sewer Pump Station	Level B2, Adjacent Air Conditioning Unit (CU-B2.1)	Sealed Hatch, With Cage	Y	Y	Y	Y	Y	Y	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 Is the space an enclosed or partially enclosed space?	B Is the space not designed or intended primarily to be occupied by a person?	C Is the space designed or intended to be at normal atmospheric pressure while any person is in the space?	D 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?		
ST-01	Sewage Holding Tank	Level B3, Sewer Tank Room, Access From B2 Hydraulic Pump Room	Metal Hatch, Within Secured Plant Room	Y	Y	Y	Y	Y	Y	Y		
ST-02	Sewage Holding Tank	Level B3, Sewer Tank Room, Access From B2 Hydraulic Pump Room	Metal Hatch, Within Secured Plant Room	Y	Y	Y	Y	Y	Y	Y		
DT-01, DT-02 & DT-03	Diesel Tank	Level B4, Diesel Tank Room	Metal Cover, Within Secured Plant Room	Y	Y	Y	Y	Y	Y	Y		
SST-02	Sewer Sump / Retention Tank	Level B4, Hydraulic Pump Room	Sealed Hatch, Within Secured Plant Room	Y	Y	Y	Y	Y	Y	Y	