

# Asbestos Containing Materials Survey - Part 5



Property Number (PMS): TPM001 Property Name: Territory Property Management Pty Ltd Property Address: 21 Knuckey St, Darwin City

Number of Structures: 1 Report Creation Date: 06 Sep 2015

Asbestos Solutions NT PO Box 42110 Casuarina NT 0811 Tel: 0451 832 064 Email: asbestossolutionsnt@bigpond.com



## **Audit Summary**

#### Introduction

Asbestos Solutions NT Pty Ltd were contracted by the Territory Property Group to carry out a Part 5 Asbestos audit on the buildings located at 21 Knuckey Street Darwin City NT.

#### **Site Description**

The site is a 132 Room Hotel comprising of various shops on the Ground floor and a 6 storey Office complex. The site has an Underground Car park

#### **Area Included**

All buildings and structures on the site.

#### Area Excluded

All underground Power, water and sewerage services.

#### Comments

No Asbestos materials were detected in the survey.

#### **Survey Findings**

Refer to Appendix in the Asbestos Register.



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# Definitions

## Act

An Act is a primary legislative instrument - it may give authority for the making of another legislative instrument. The role of an Act is to constitute the process of formulating general rules or conduct without reference to particular cases and they usually operate in the future. Acts state the general principles of a scheme.

#### Asbestos

Asbestos refers to the fibrous form of mineral silicates arising from serpentine and amphibole rock forming minerals. These silicates include:

Serpentine Group

- Chrysotile (white asbestos)
- Amphibole Group
- Amosite (brown asbestos)
- Crocidolite (blue asbestos)
- Actinolite, tremolite and anthophyllite.

Asbestos may also be considered as any mixture of the above groups.

Materials containing asbestos may include "fibro" products, spray-on fireproofing, soundproofing/thermal insulation, acoustic plaster, and insulation and friction materials such as brake linings, clutch pads, gaskets and seals.

Asbestos has been used as insulation for pipes, autoclaves, ovens, mattresses, heat blankets, rope, vinyl tiles, fire doors, building material (sheet), piping, laboratory bench tops, switchboards, clutch linings, batteries and many other uses.

Asbestos is typically found in buildings more than 25 years old, as cement sheeting, spray-on fireproofing, black electrical mounting boards, vinyl flooring, asbestos wire insulation and at times, within boilers and heating units.

## Asbestos Cement Sheet (AC)

Asbestos cement sheet is a building material, which is a composite of asbestos fibres, plant fibres, cement and sand. This includes flat or corrugated compressed sheeting, pipes and roof shingles.

## Asbestos Containing Materials (ACM's)

Asbestos containing materials are any material that contain asbestos.

#### **Asbestos Related Activities**

Activities which involve the identification, evaluation and control of asbestos situations, including removal.



### **Code of Practice**

A Code of Practice provides practical guidance for prevention, assessment and control of the subject matter. It is designed to assist in the implementation of the provisions of associated regulations.

### Friable

The term friable is used to describe asbestos containing material or synthetic mineral fibres that can be crumbled, pulverised or reduced to particles by hand pressure when dry. Friable asbestos is considered to represent a particular hazardous state. It typically includes spray-on insulation, fireproofing or soundproofing.

#### **Presumption Criteria**

Where samples have not been taken (i.e. restricted access) the suspect samples are simply presumed to contain asbestos. Or if materials historically contain asbestos and visual inspection confirms the likelihood that asbestos is present (i.e. gaskets) then again these areas are presumed to contain ACM. The presumption criteria can also be used where a facility contains multiple suspected areas which likely contain ACM (i.e. fire doors).

Once the presumption has been made the material must be treated as an ACM with work practices and disposal criteria as required for the presence of asbestos, until the material is removed or testing has confirmed that it does not contain asbestos.

#### Regulation

Regulations deal with matters of administrative or technical detail, particularly where this detail may need to be changed from time to time.

# Introduction

# Background

Asbestos Solutions NT has been engaged to:

- Undertake a Part 5 re-survey of asbestos containing materials (ACM's) located at the site.
- Prepare an asbestos register.

This survey is to assist the client and building management in identifying the location of ACM's at the site and to provide a basis for the ongoing management.



# Scope of Works

## Purpose

The purpose of the asbestos survey is to identify the locations and condition of ACM's within the building and to provide advice in relation to appropriate ongoing management of the identified materials. This survey forms part of the overall responsibility as owner/occupier of the property.

## Nature of Survey

The surveys consisted of the following:

- An inspection of the property.
- Collection of samples (where required).
- Confirmation of existing ACM's and their condition
- The addition of any new suspected ACM's.
- Register update.

The survey was developed in accordance with the following codes of practice and guidelines:

• Code of Practice for the Management and Control of Asbestos in Workplaces. [NOHSC:2018 (2005)].

The asbestos survey did not include the following:

- An investigation or assessment of areas of the site that were not readily accessible or practicable to access on the day (including within switchboards, lift infrastructure, internal air conditioning and heating units). Practicable in this sense means that plant and equipment would have had to be dismantled, or unacceptable damage would have been incurred if the inspection had proceeded or in operation and therefore unsafe to investigate.
- Reviews of any licenses or approvals held in relation to the use, handling or presence of ACM's at the site, or past, current or proposed removal or treatment of ACM's at or from the site.

# Limitations

# Conditions of Engagement

Whilst this survey has been prepared in a manner consistent with the level of quality and skill generally exercised by members of Asbestos Solutions NT profession, it must be read and interpreted subject to the following limitations:

• The survey was prepared solely for the purpose described in Section 2.1. It should not be relied on, or used by, the client for any other purpose.



- The survey was prepared solely for the client and should not be relied on, or used by, any other party for any purpose whatsoever.
- Where information referred to in the survey was obtained from third parties, Asbestos Solutions NT has not independently verified the accuracy or comprehensiveness of the information supplied and accepts no responsibility or liability arising from any inaccuracies or omissions in the information supplied.
- Although care was taken during the site inspection to identify all asbestos containing materials at the site, asbestos may be present at the site in concealed areas or locations of the property not accessed at the time of inspection.
- The information contained in this survey is based on conditions that existed at the date of the survey. No responsibility for matters or events arising after that date is accepted. In particular, the survey cannot be relied on if alteration or demolition work is undertaken in the future or if site conditions change or are altered, after the date of the survey.
- The survey is not for the purposes of an Occupational Health and Safety (OH&S) Assessment. The survey is in no way to be considered or interpreted as a review of the legal obligations pertaining to the site or as an assessment of compliance of the site with legal standards or obligations or subsequent regulations.
- The information contained in this survey should only be presented in full and may not be used to support any other objectives other than those stated in this survey. In particular, the asbestos materials register, and other appendices attached to the survey should not be separated from the body of the survey for any purpose or use whatsoever.
- This survey should not be used for the purpose of tendering, preparing costing or budgets, programming of work, refurbishment of works or demolition work.

## Accuracy

The information contained in this survey is considered to be accurate on the date of the survey in accordance with the current conditions of the site. These conditions may vary from time to time as the result of further activity that may influence the condition of the ACM's identified at the site. In addition, limited non destructive sampling was undertaken at the site. As a result the inspection cannot be regarded as absolute.

## **Completeness of Inspection**

Locations where the assessment of asbestos may not have been practicable include, but are not limited to:

• Internal sections of air-conditioning systems and hot water/heating systems, wall partitions, fire doors and electrical light fittings.



- Concealed or inaccessible areas or voids within the building such as wall cavities, beneath floors, carpets and slabs, above fixed ceilings and confined spaces.
- Integral parts of boilers, pumps, machinery, plant and pipe work.
- Areas where the presence of asbestos containing materials was not considered to represent a significant exposure risk.
- ACM's concealed by other materials, preventing visual access or identification or installed in non-typical applications.

No asbestos survey can guarantee to identify all ACM's present in a building. Whilst this survey has been prepared in a manner consistent with the level of quality and skill generally exercised by members of Asbestos Solutions NT profession, there is no guarantee, expressed or implied, that all ACM's have been identified in this survey.

Based on the above information, further investigation and sampling will be required prior to demolition or refurbishment works.

# Methodology

The inspection consisted of a visual check of suspected asbestos materials within the premises and sampling when required based on professional judgement.

Details of the sample collection are provided below and the results are provided in Appendix A.

The methodology is a risk-based approach, which seeks to identify ACM that are commonly found at properties more than 25 years old. The approach involves both visual and laboratory identification of ACM's which are readily accessible at the property, and may represent a health risk if disturbed.

Where samples are not able to be taken it is sometimes necessary to presume the material contains asbestos. Once such a presumption has been made, the material must be treated as an asbestos containing material until it is confirmed by analysis or removed.

Samples were not taken from the following materials suspected as containing asbestos:

- Switchboards located throughout the building.
- Fire Doors.
- Air Conditioning ducts.
- Vinyl tiles.
- Mastics, sealants, adhesives and paints.



These have not been sampled because in some cases these materials are considered low risk, samples are not possible (i.e. from fire doors as sampling effects the integrity of the door) or for economic reasons.

## Firedoors

While all care has been exercised to ensure all fire doors have been checked and labelled it is possible that some fire doors have been missed or were not accessible during the audit. Asbestos free fire doors will be labelled "Asbestos Free" on the nameplate or will have a recently dated nameplate. Before any work is performed on any fire door Asbestos Solutions NT that the nameplate is checked in consultation with the register, if there is any doubt then the fire door should be treated as containing asbestos until verified otherwise.

# Vinyl Tiles

While all care has been exercised to ensure all vinyl tiles have been checked and labelled it is possible that some vinyl tiles have been missed, were not accessible during the audit or previous analysis have concluded that the tile does not contain asbestos (when in fact due to the non-homogeneous nature of vinyl tiles it may contain asbestos, just not in the area sampled). If there is any doubt about whether a vinyl tile contains asbestos then the vinyl tile should be treated as containing asbestos until verified otherwise.

# Air Conditioning Ducts

While all care has been exercised to ensure all HVAC systems have been checked for ACM millboard it is possible that some ACM components have been missed or were not accessible during the audit. If there is any doubt about whether a HVAC system contains ACM's then the system should be treated as containing asbestos until verified otherwise.

# Sampling Procedures

#### **Asbestos Containing Materials**

All samples were collected using pinch pliers or other appropriate sampling equipment. While samples were being collected, all relevant safety procedures were adhered to in accordance with relevant OH&S procedures and Codes of Practice. Suspected materials are regarded as potentially containing asbestos and full precautions applied.

Samples were collected from suspected ACM's and particularly those of a friable nature. A discrete and non-destructive technique of sampling was used to minimise any obvious sign of damage and limit any damages to the integrity of the material.

Due to the operating nature of the premises, no samples were taken from within air plenums such as air conditioning fan rooms, operating furnaces, fire doors, heaters or other locations where non-destructive safe sampling cannot be conducted.



All tools were cleaned throughout, following each sample collection, to prevent any cross contamination, in some cases, adjoining areas were also wiped clean. All disposable materials, which were likely to have come in contact with any ACM's, were double sealed into plastic bags for subsequent disposal.

In all cases attention was paid to the collection of representative samples. When variations in colour, texture, etc. were noted, additional sampling was initiated.

Asbestos containing materials not considered to represent a significant exposure risk include, but are not limited to; paints, mastics, sealants, adhesives and similar materials. Such materials were typically not sampled.

#### Field Log-Sheets

The field inspector recorded each sample of suspected ACM's on a field log-sheet as it was collected. Such field log-sheets include information on the date, time, sampling location and sample number.

#### Sample Labelling

Each sample of suspected asbestos was placed in an individual re-sealable plastic bag, which was sealed in a second plastic bag before dispatch to the laboratory. Each bag was then labelled with a unique numbering system, which enabled laboratory staff to identify and track samples.

#### Sample Examination

Samples were analysed by NATA certified laboratories that use polarised light microscopy and X-ray diffraction to identify the presence of asbestos.

# **Risk Evaluation**

## Introduction

A qualitative risk evaluation was performed to identify the hazards posed to site occupants by the ACM's identified on the site. The evaluation consists of risk assessment on the identified ACM's and assigning a priority rating system for the management of such materials.

## Methodology

#### Assessment of Risk

The risk evaluation is based on an assessment of a range of factors, such as the friability, location and condition of the identified materials.



In addition, the auditors have also considered the nature of the work in relation to the vicinity of the building occupants. In all circumstances the methods adopted have aimed to minimise the likelihood of fibres releasing into occupied space.

The above factors have been utilised in the process of determining appropriate recommendations for the timing of assessment activities and have assisted in the development of the management plan.

#### **Priority Rating System**

The priority rating systems in the following section were designed as a guide for the development of a management plan. The actual setting of priorities for implementation of control procedures will depend not only on the allocated rating, but also on factors such as changes to work practices or the physical environment that occur during refurbishment or demolition. In spite of this, the allocated rating does provide a reasonable guide to the appropriate priority setting with regard to the current condition of the materials.

## **Priority Ratings**

#### Asbestos Containing Materials Ratings

There are four priority ratings in the system as outlined below. They are a guide only and the client should decide the most appropriate controls based on such factors as risk, detailed knowledge of workplaces and procedures, plans for upgrade or refurbishment.



#### Priority Rating for Control of Asbestos Containing Materials

Priority 1 – P1	Immediate Risk Level			
asbestos insulation and asb presents an immediate heal immediate control measure	le to the presence of friable material, such as limpet estos ropes, especially if in a deteriorating state. It th risk in its current condition and location and s are required. The area containing this material should ance, from personnel. Abatement is highly			
recommended at the earliest practicable time.				

Priority 2 – P2Potential Risk LevelThis level of risk is applicable to damaged or unstable material such as broken or<br/>deteriorated cement sheeting, which presents a potential health risk if disturbed.<br/>Control measures to stabilise the material should be initiated immediately to prevent<br/>the chance of the contamination spreading to other areas. Formal abatement

should be considered.

Priority 3 – P3	Low Risk Level
require some minor mainter	le to damage non-friable or stable material that may nance. Maintenance work should be carried out to naged area. Control must be implemented to protect r damage

Priority 4 – P4

**Negligible Risk Level** 

This level of risk is applicable to non-friable or stable materials, such as painted cement sheeting, vinyl floor tiles, etc. It is unlikely for these materials to present a health risk unless damaged, cut, sanded, abraded or machined. These materials should be maintained in good condition and reassessment of the priority rating will be required if any maintenance or building works impact on their condition.



# References

- How to Safely Remove Asbestos: Code of Practice. Safe Work Australia. December 2011.
- How to Manage and Control Asbestos in the Workplace: Code of Practice. Safe Work Australia. December 2011.
- Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres. 2nd Edition. WorkSafe Australia, [NOHSC: 3003 (2005)]



# Appendix A

Asbestos Register



LOCATION	DETAILS		RISK	Asbestos
Deposit ID: TPG002 Sample ID: NT1223 Ground Bathroom access Hallway Floor	Application: Description: Accessibility: Amount: Recommendations: Due Date:	Sheet Vinyl	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable Not Applicable 2015-08-25
LOCATION	DETAILS		RISK	Asbestos
Deposit ID: TPG003 Sample ID: NT1224 Ground Bathroom stairwell Wall	Application: Description: Accessibility: Amount: Recommendations: Due Date:	Black vinyl	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable Not Applicable 2015-08-25
LOCATION	DETAILS		RISK	Asbestos
Deposit ID: TPG001 Sample ID: NT1222 Ground Bathrooms Toilet	Application: Description: Accessibility: Amount: Recommendations: Due Date:	Cement Sheet	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable Not Applicable 2015-08-25
LOCATION	DETAILS		RISK	Asbestos
Deposit ID: TPG004 Sample ID: NT1225 Ground & First External Walls	Application: Description: Accessibility: Amount: Recommendations: Due Date:	Cement Sheet	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable Not Applicable 2015-08-25

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## Building ID: B01

LOCATION	DETAILS	RISK	Asbestos
Deposit ID: TPG005 Sample ID: NT1226 Ground Shop T12 Kitchen Hand Basin	Application: Wall lining Description: Cement Sheet Accessibility: Accessible Amount: 2 m <sup>2</sup> Recommendations:	Substance Type: Condition: Damage or Deterioration Potential:	Not Present Not Applicable Not Applicable
	Due Date:	Activities that May Disturb Material: Remedial Action: Audit Findings: Assessed: Risk Ass.	2015-08-25
LOCATION	DETAILS	RISK	Asbestos
Deposit ID: TPG008 Sample ID: Ground Throughout Ceilings	Application: Linings Description: Gyprock , Masonry, Fibre & Gypsum tiles Accessibility: Amount: Recommendations: Due Date:	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable 2015-08-25
LOCATION	DETAILS	RISK	Asbestos
Deposit ID: TPG006 Sample ID: Ground Throughout Floors	Application: Coverings Description: Carpet,Vinyl and Ceramic tiles Accessibility: Amount: Recommendations: Due Date:	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable 2015-08-25
LOCATION	DETAILS	RISK	Asbestos
Deposit ID: TPG007 Sample ID: Ground Throughout Walls	Application: Linings Description: Masonary & Gyprock & Ceramic Tiles Accessibility: Amount: Recommendations: Due Date:	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable 2015-08-25

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## Building ID: B01

LOCATION	DETAILS		RISK	Asbestos
Deposit ID: TPG011 Sample ID: Offies Throughout Ceilings	Application: Description: Accessibility: Amount: Recommendations: Due Date:	Gyprock & Gypsum Tiles	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable Not Applicable 2015-08-25
LOCATION	DETAILS		RISK	Asbestos
Deposit ID: TPG009 Sample ID: Offies Throughout Floors	Application: Description: Accessibility: Amount: Recommendations: Due Date:	Coverings Carpet,Vinyl and Ceramic tiles	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable Not Applicable 2015-08-25
LOCATION	DETAILS		RISK	Asbestos
Deposit ID: TPG010 Sample ID: Offies Throughout Walls	Application: Description: Accessibility: Amount: Recommendations: Due Date:	Gyprock & Masonry & Wood paneling	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable Not Applicable 2015-08-25
LOCATION	DETAILS		RISK	Asbestos
Deposit ID: TPG014 Sample ID: Throughout Hotel Ceilings	Application: Description: Accessibility: Amount: Recommendations: Due Date:	Gyprock	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable Not Applicable 2015-08-25

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## Building ID: B01

LOCATION	DETAILS		RISK	Asbestos
Deposit ID: TPG012 Sample ID: Throughout Hotel Floors	Application: Description: Accessibility: Amount: Recommendations: Due Date:	Carpet, Vinyl and Ceramic tiles	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable Not Applicable 2015-08-25
LOCATION	DETAILS		RISK	Asbestos
Deposit ID: TPG013 Sample ID: Throughout Hotel Walls & Particians	Application: Description: Accessibility: Amount: Recommendations: Due Date:	Masonary & Gyprock & Cement Sheet	Substance Type: Condition: Damage or Deterioration Potential: Activities that May Disturb Material: Remedial Action: Audit Findings:	Not Applicable Not Applicable Toilet Particians sim sample NT1222 and do not contain Asbestos. 2015-08-25



# Appendix B

Lab Report



Darwin Laboratory

#### Asbestos Bulk Sample Analysis Report Certificate No NT1508271204

Client:	Asbestos Solutions NT	Sampled By:	As received
Client Contact:	Ken Jones	# of Samples Submitted:	5
Telephone:	0451 832 064	Sampling Date:	25/08/2015
Email:	asbestossolutionsnt@bigpond.com	Date Received:	27/08/2015
Project:	-	Identification Date:	27/08/2015
Site Location:	Darwin Central Hotel - Smith Street, Darwin	Issue Date:	27/08/2015
Test Methodology:	Polarized light microscopy examination including dispersion staining techniques for the presence of asbestos in accordance with the methodology outlined in the In-House Procedure QP-930-001 which is based on Australian Standard (AS4964-2004)		

Branch Site:

Sample ID	Sample Location	Sample Description	Size or Weight	Asbestos Detected (Yes/No)	Fibre Types Detected
NT1222	Cement sheet - Toilet partition	Fibre cement sheeting	2x2x1mm	No	NAD-ORG
NT1223	Vinyl - Hallway floor	Vinyl sheeting	14x3x2mm	No	NAD-NFD
NT1224	Black vinyl - Kick panel stairwell	Vinyl sheeting	13x5x2mm	No	NAD-NFD
NT1225	Cement sheet - Entrance fascia	Fibre cement sheeting	6x6x2mm	No	NAD-ORG
NT1226	Cement sheet - Kitchen hand basin wall sheet	Fibre cement sheeting	10x10x2mm	No	NAD-ORG

Approved Identifier:

John Quinones

**Report Approved By:** 

Hund

John Quinones

#### **Fibre Types**

CHR	Chrysotile (white asbestos) fibres detected	ORG	Organic fibres detected
AMO	Amosite (brown / grey asbestos) fibres detected	SMF	Synthetic mineral fibres detected
CRO	Crocidolite (blue asbestos) fibres detected	UMF	Unidentified mineral fibres detected
NFD	No fibres detected	NAD	No Asbestos Detected

**Notes:** Hand-picked refers to small discrete amounts of asbestos distributed unevenly in a large body of non-asbestos material. Detection limit (AS 4964) – 0.1 g/kg.

Due to their nature, confirmation using another independent analytical technique is recommended if no asbestos is detected in samples of vinyl tiles, bituminous materials, mastics, adhesives, paints, sealants, resins or ore.

The results contained within this report relate only to the sample(s) submitted for analysis and OCTIEF accepts no responsibility for the collection, packaging and transportation of sample submitted by external parties. Sample descriptions, sizes and weights are approximate only. NATA does not accredit sampling.

SCOPE OF ACCREDITATION: Class 7.82.31: Qualitative identification of asbestos types in bulk samples by polarized light microscopy

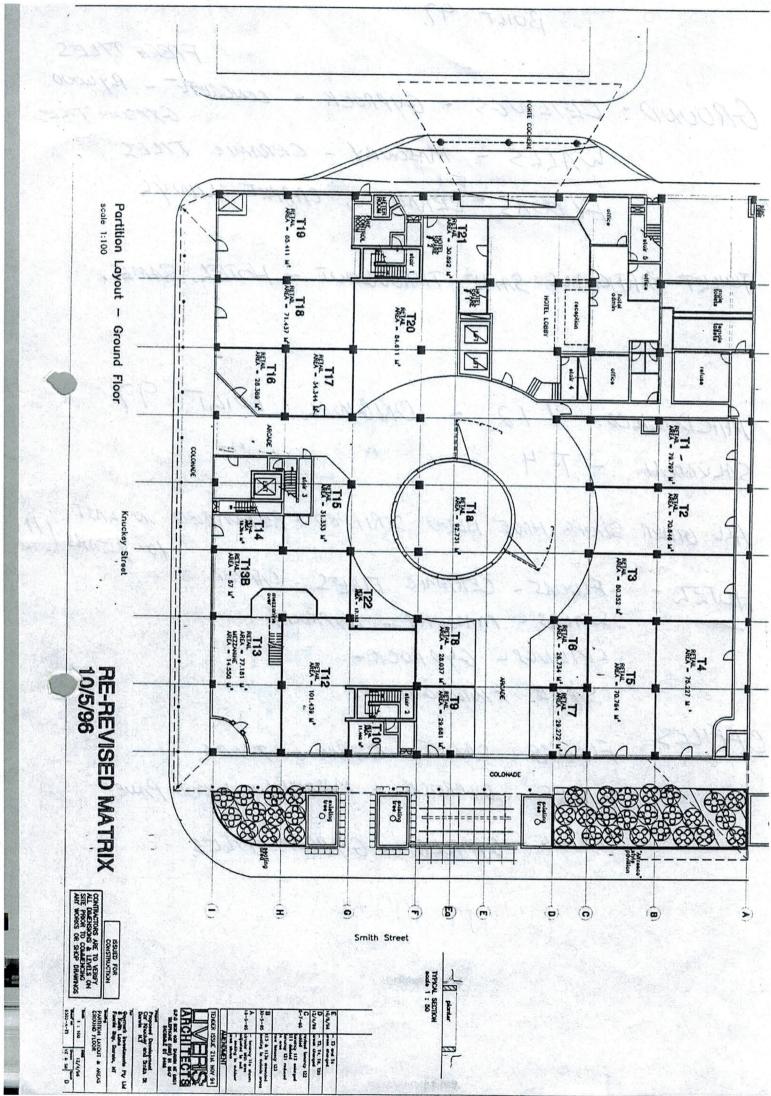


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# Appendix C

Site Plan

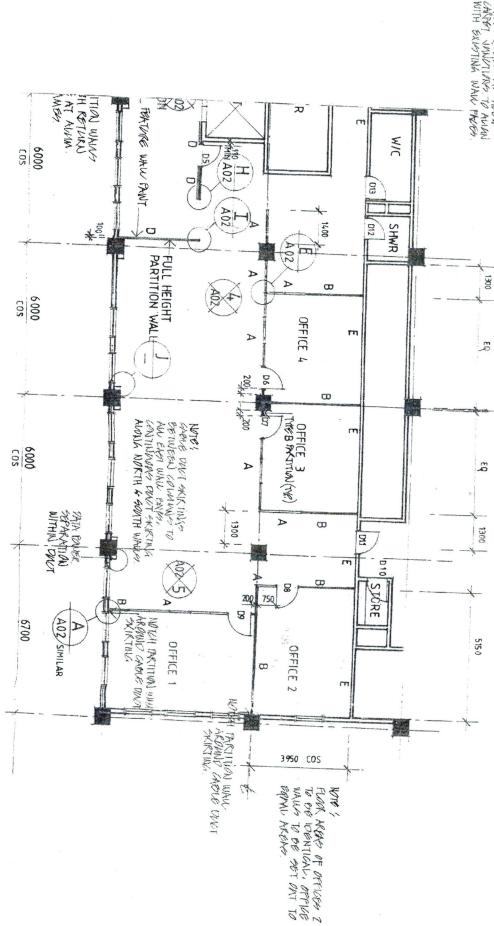




- Interior Turnknob escutcheon key to outside. Outside/Inside: opened by handle when turnknob not in the locked position. Lockwood digital keypad lock/latchset (with key overide) with inside furniture lever. Outside opened when correct
- 2 numbers keyed in Inside opened by lever at all times Keying: All doors within the tenancy to be masterkeyed to suit the building keying system. The tenancy will not be accessible by other tenants within the building. Doors within tenancy to be keyed separately except doors: D4 and D5 which are to be keyed aliku. Office, Store and Conference Room doors are to be accessed utilising a single key, in the key to Office One will open doors D4 and D5, however, no other door, conference Room doors are to be accessed utilising a single key, in the key to Office One will open doors D4 and D5, however, no other door,
- 60 00 separately keyed door to be provided on completion of the works to the Superintendent. Doorstop: Delco 13003, skirting mounted, SCP staff seated in the open office areas will be able to access doors D4 & D5, however, no other door. 2 master keys and 2 keys for each

- Door Closer: Semi-concealed (cover plate of body shows on the mounting surface), hold open function, tension of closer must ensure that door closes with a 15 second delay for ease of disabled access, and meet AS1428, Design for Access and Mobility. Mount on internal face of door, Door closer to suit door weight and size and be equal to Lockwood Arrow 727 Series Door Closer, cast aluminium body. Door Seals: Raven Acoustic Medium Duty Door Sealing System comprising Door Frame Seal RP10 and Door Bottom Seal RP8

CARPET BOANS AT THE & TUGE CALSTING CARTET 10. DOOR Seals: Reven A TUGE THUND, PAULOGKANNU TUGE CHUND, PLOVIDE CLEAK ANDOLYSSO ALVAN, ANALU



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