

D2 Draft Asbestos Management Plan

Douglas Partners



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Douglas Partners

Geotechnics • Environment • Groundwater

**REPORT
ON
ASBESTOS MANAGEMENT PLAN**

**ERSKINE PARK QUARRY
PATONS LANE
ORCHARD HILLS**

**Prepared for
DELLARA PTY LTD**

**Project 71102.01
May 2010**

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Project 71102.01
20 May 2010

**ASBESTOS MANAGEMENT PLAN
ERSKINE PARK QUARRY
PATONS LANE, ORCHARD HILLS**

1. INTRODUCTION

Douglas Partners Pty Ltd (DP) has been commissioned by Mr Rick Miller of Dellara Pty Ltd to prepare an Asbestos Management Plan (AMP) for the subject site. The site is currently occupied by the non-operational Erskine Park Quarry although plans are in place to operate a licensed waste landfill at the site.

The AMP sets out procedures and safeguards necessary for the on-site relocation and re-burial of asbestos waste (special waste) in a designated waste emplacement cell. This 'treatment on site' management plan can lessen the risks and costs associated with taking the material off-site and disposing of it.

The project personnel responsible for the on-site relocation and re-burial of asbestos waste (special waste) must be provided with a copy of this AMP and follow the requirements set out in this AMP.

All designated staff/personnel including contractors undertaking the on-site relocation and re-burial of asbestos works must comply with the requirements of the AMP. A copy of the AMP must be issued to all such designated personnel. In addition, a copy must be made available at the Management Office for reference by any site personnel.

This AMP has been peer reviewed by Mr Philip Hibbs of Philip Hibbs & Associates Pty Ltd a certified occupational hygienist.

2. SITE DESCRIPTION

The site is located within a rural area surrounded by grazing land, pockets of established tree canopy and low density housing. To the west of the site is land owned by the Commonwealth which is used by the Australian Defence Force. To the north and east of the site is open grazing land and rural housing. Blaxland Creek passes through the north-west boundary of the site. The land south-west of the site is occupied by facilities associated with an existing horse stud.

The site is occupied by the currently non-operational Erskine Park Quarry. Amenity bund walls with approximate total length of 1800 m and approximate heights of 9 m – 19 m are located around the perimeter of the site. A number of clay and shale stockpiles are also present within the site. A range of demountable office buildings and equipment facilities are situated at the south-eastern and north-western sections of the site, respectively.

The water bodies present on site are the existing quarry void, part of Blaxland Creek and the dams at the south-east, north-west and north-east sections of the site.

3. BACKGROUND INFORMATION

Douglas Partners Pty Ltd undertook a preliminary *in situ* waste classification assessment of materials within the bund walls of the site between the period April – August, 2009.

The bund walls subject to waste classification assessment are situated along the north-eastern, north-western and south-western boundaries of the site.

The subject materials were assessed in accordance with the DECC *Waste Classification Guidelines*, April 2008 (revised July 2009). The Australian Department of Health and Ageing, *enHealth: Management of asbestos in the non-occupational environment*, 2005 and the Western Australian Department of Health, *Guidelines for the Assessment, Remediation and Management of Asbestos – Contaminated Sites in Western Australia*, May 2009 were referenced in order to establish the degree and level of asbestos contamination in the materials assessed.

For contamination evaluation purposes, the soil analytical results were also assessed against the health-based investigation levels for commercial/industrial land use (HIL Column 4, as set out in Appendix II, *Guideline for the NSW Site Auditor Scheme (2nd Edition) 2006*).

Analytical results from 60 samples indicated that, with the exception of one sample, all total and leachable contaminant concentrations were within the general solid waste criteria. Asbestos was found embedded in plaster fragments in one sample, slightly above the reporting limit of 0.1 g/kg at 0.42 g/kg.

Based on visual observations and the laboratory results, the materials within the perimeter bund walls were classified into three categories. The bund walls located adjacent to the northern boundary of the site (i.e. Test Bores 1 - 5 and 19) and the bund walls located at the southern west corner of the site (i.e. Test Bores 14 - 16) were classified as general solid waste (non-putrescible) as these bund walls essentially comprise 'excavated natural material' from the site itself. The materials in the vicinity of Test Bore 12, from the surface to 1.5 m depth into the bund wall were classified as special waste (asbestos). The materials containing building and demolition waste with asbestos fibre analysis below reporting limits (i.e. Test Bores 6 - 9, 17 and 18) and the materials located in close proximity (i.e. Test Bores 10, 11, 13 and 20) should be considered as possible general solid waste which may contain minor traces of asbestos.

It should be noted that if detectable asbestos-based materials are identified during future excavation works, this may change the classification of the fill material from General Solid Waste (non-putrescible) to special waste (asbestos). Materials that contain asbestos (i.e. around Test Bore 12) are required to be disposed of in a landfill licensed to accept special waste (asbestos). The classification of waste defined on site will allow the Proponent to either leave the materials classified as general solid waste (non putrescible) on site within the existing bund walls or emplace the materials on site within one of the planned emplacement cells.

4. PREFERRED REMEDIATION STRATEGY

It is considered impractical to remove all asbestos contaminated soil (special waste) from the site as a significant volume of material will require excavation and removal which could have adverse impacts on the site workers and local community. Further, the costs associated with excavation, transport and off-site disposal of the expected large volume of contaminated soil present on the site would be prohibitive.

The proposed remediation strategy involves the excavation of asbestos contaminated soils (special waste) on the site and their transfer to a proposed-built containment cell constructed on site. Thus, the advantage of this option is that asbestos contaminated soils (special waste) are consolidated to one area on site.

5. OBJECTIVES OF THE AMP

The objective of this AMP is to detail the requirements for the on-site relocation and re-burial of asbestos waste (special waste) and to establish procedures and practices for the management and monitoring of on-site relocation and re-burial.

The AMP is designed to achieve the following:

- Minimise impacts from asbestos within the site on the environment and on public health and safety during on-site relocation and re-burial;
- Provide protection for workers involved with relocation and re-burial works; and
- Render the site safe for the proposed land use and minimises exposure pathways for asbestos present within the soil.

An Occupational Health and Safety Plan (OHSP) is also provided in Section 8 of this AMP, which details the safeguards required to complete the remediation in a safe and responsible manner.

6. RELOCATION AND RE-BURIAL

On-site relocation and re-burial is required for the identified asbestos waste (special waste). The anticipated volume of materials which may contain asbestos waste is approximately 3750 m³, as illustrated in Figure 1, Appendix A. It should be noted that this volume is likely to comprise largely non asbestos materials such as bricks and concrete and that the proportion of asbestos containing materials within the waste mass of 3750 m³ is likely to be minor.

6.1 Regulatory Requirements

If working in areas where asbestos is present in the soil the following legislation, regulations and codes of practice should be taken into consideration:

- *Asbestos in Soils ACLCA Code of Practice, version 2, 25 February 2002;*
- *AS/NZS 1715 Selection, Use and Maintenance of Respiratory Protective Devices;*
- *AS/NZS 1716 Respiratory Protective Devices;*
- *Code of Practice for the Management and Control of Asbestos in Workplaces [NOHSC:2018 (2005)];*
- *Code of Practice for the Safe Removal of Asbestos [NOHSC: 2002 (2005)];*
- *Guidance Note on the Interpretation of Exposure Standards for Atmospheric Contaminants in the Occupational Environment [NOHSC:3008 (1995)] 3rd edition;*
- *Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Dust [NOHSC: 3003 (2005)];*
- *Guidelines for the Assessment, Remediation and Management of Asbestos – Contaminated Sites in Western Australia, May 2009;*
- *NSW Occupational Health & Safety Act 2000;*
- *NSW Protection of the Environment Operations (Waste) Regulation 2005: Part 4 Clause 42 Special requirements relating to asbestos waste;*
- *Occupational Health and Safety Regulation 2001 (OHS Regulation);*

- *The Australian Department of Health and Ageing, enHealth: Management of asbestos in the non-occupational environment, 2005;*
- *The Australian Safety and Compensation Council (ASCC) exposure standards are outlined in Adopted National Exposure Standards for Atmospheric Contaminants In the Occupational Environment [NOHSC: 1003 (1995)]; and*
- *Working With Asbestos Guide 2008 WorkCover.*

The following sections outline the proposed relocation and re-burial strategy for the works. WorkCover must be notified 7 days in advance of any asbestos works.

6.2 Relocation of Asbestos Waste

6.2.1 Excavation of Asbestos Waste

Prior to commencement of work, safe work method statement for the excavation work is to be compiled by the appropriate contractor undertaking and/or supervising that work. The proposed excavation area should be barricaded to restrict entry of unauthorised personnel. Placement of an adequate number of indelibly labelled caution signs at the boundary of the area of asbestos removal works, which comply with AS 1319 *Safety Signs for Occupational Environment*.

The identified asbestos waste should be continually watered during excavation, loading and unloading of asbestos contaminated soils to reduce dust and possibly asbestos free-fibres generation. Asbestos is a health risk to the respiratory system and dust should therefore be carefully controlled prior to and during the relocation and re-burial works.

It is noted that the previous DP report did not encounter any respirable fibres and asbestos was only found embedded in plaster fragments in one soil/material sample out of the 60 samples taken and analysed from the bund materials on the site. Nevertheless, mandatory requirements for air monitoring are required to be undertaken by an environmental consultant during relocation and re-burial of asbestos waste to check on the protection of the health of the general public, in particular, the site workers.

6.2.2 Air Monitoring Program

Dust and possibly asbestos free-fibres can be generated during excavation, loading, transportation and unloading of asbestos contaminated soils. A suitable air-monitoring program is, therefore, required to assess whether air-borne asbestos has been exposed to, or has the potential to be exposed to, the site workers and/or the surrounding environment. A continuous spray of water mist system should be applied during the remedial works in order to reduce dust and air borne fibres.

Prior to any excavation works, a total of six air samples will be collected around the boundary of the proposed excavated area/designated cell as control samples – four air samples will be collected at the four corners of the boundary and two air samples in the middle of boundary (where possible). The purpose of collecting control samples is to record the natural background condition of the atmosphere around the work site and develop a benchmark level for the monitoring program.

Daily air monitoring is required during excavation, loading, transportation and unloading of asbestos contaminated soils. All air monitoring will be performed by a qualified environmental consultant. The monitoring program will be conducted on an eight-hour daily basis until all site remedial works have been accomplished.

Daily air monitoring will be carried out by an environmental consultant at the following locations prior to the commencement of daily remedial works:

- the boundary of the proposed excavation area/designated cell as described above (six air samples);
- on a nominated site personnel (an air sample); and
- the exterior of excavator(s) (one to two air samples).

In addition to the above, the information collected for air sampling will also include the following:

- the date and time of sampling;
- the name of the sampler;

- sampling instrument used, its accessories and the method of analysis e.g. flow rates, filters used and any deviation from standard protocol and reasons;
- the location, nature, dimensions and other distinctive features of the site;
- where static measurements were made; and
- the activities and location of any person wearing a sampling device.

Air samples will be collected at the end of every working day and despatched to a NATA accredited laboratory for analyses.

Air quality/control monitoring is used to measure airborne respirable fibre levels which can then be compared with the action levels shown in Table 1. If these levels are exceeded, action should be taken to re-evaluate controls as outlined in Section 9.

Table 1 - Allowable Levels of Asbestos Fibres in Air

Action Level (airborne asbestos fibres/ml)	Action
Less than 0.01	Continue with control measures
Between 0.01 and 0.02	Review Control Measures
More than 0.02	Stop removal and identify the cause with appropriate rectification action

Code of Practice for the Safe Removal of Asbestos [NOHSC: 2002 (2005)]

6.2.3 Transport of Asbestos Waste

Transport of asbestos waste from the bund area to the designated disposal cell shall be via a clearly delineated, pre-defined haul route. The proposed transport route will be notified and approved by the site manager. A site diary will be maintained by the contractor to record daily progress, abnormal occurrences, incidents, truck movements and load characteristics.

The truck/container used for transport of asbestos waste should be lined with tough (minimum 200-micron thick) disposable polyethylene plastic sheeting large enough to cover the base and sides of the truck/container. The sheets may be secured to the sides of the container with double-sided tape to facilitate loading. When the container is properly filled, a layer of plastic liner should be covered over the top and sealed in such a way as to prevent material from blowing out of the container.

Upon the completion of works, vehicles used for the transportation of asbestos waste – including tyres, wheel wells and undercarriages should be properly decontaminated.

6.3 Re-burial of Asbestos Waste

A 'Cell Design Assessment' report conducted by Aquaterra Consulting Pty Ltd as part of the Specialist Consultant Studies for the proposed Orchard Hills Waste and Resource Management Facility, recommended that asbestos waste '*will be placed at the toe of the active cell's batter and covered initially with 0.15 m and by at least 0.5 m of waste or cover at the end of the day. By disposing of the asbestos at the toe of the active cell's batter, asbestos will not be exposed when the daily cover is scraped back from the top of the emplacement bench in the future*'. It should be noted that the capping layer must be covered by either virgin excavated natural material (VENM) or verified clean fill as in accordance with *Clause 42 (d) of the Protection of the Environment Operations (Waste) Regulation 2005*.

6.3.1 Capping Layer

The final capping layer can consist of either 0.5 m of VENM or verified clean fill but must be placed at least 1.0 m beneath the final land surface of the cell. It should be underlain by a marker layer which is placed to provide a warning that asbestos contaminated material is present beneath the marker in the event of a breach of the capping layer. Construction of the capping layer will consist of the following steps:

- Provision of information on the materials to be used for the marker layer to the environmental consultant for approval. The marker layer will consist of a durable, permeable engineered materials preferably brightly coloured, such as geofabric or open-weave plastic (e.g. Bidim);
- Preparation of the substrate to the pre-capping levels prior to the installation of the marker layer and capping layer;
- The final capping layer should be placed as soon as possible after placement of the marker layer to minimise the risk of damage to the marker layer. The placement of the capping layer will be inspected by an appropriately qualified Environmental Consultant;

- Preparation of a post placement survey plan showing the cell location (coordinates of the cell boundaries and corners), the nature and level and extent of the as-constructed marker layer and capping thickness. This survey plan will need to be appended to the updated version of this document and on the final validation report and construction assurance and quality (CQA) report for the cell.

6.4 Validation Assessment

The validation strategy has been devised broadly on the basis of the Western Australian Department of Health, *Guidelines for the Assessment, Remediation and Management of Asbestos – Contaminated Sites in Western Australia, May 2009*. Section 4.3 of the adopted guidelines states that 'at least 1 sample from each wall per 5 m length of strata of interest (or per 1 m depth' is to be implemented. 'Floor should be visually inspected and if suspect may need to be sampled at twice the minimum density outlined in the *Contaminated Sites Management Series (CSMS)*.

According to the previous DP report, the dimension of the area classified as special waste (asbestos waste) is approximately 25 m x 100 m x 1.5 m. It is, therefore, anticipated that a minimum of 50 samples would be required to sufficiently validate the subject area. As asbestos is the only material of concern analysis would be for asbestos fibres only. Visual assessment of the remaining substrate would also be conducted for potentially asbestos containing materials such as fibrous cement.

Field Quality Control procedures should typically include collection of duplicate and replicate (field split duplicate) samples at an overall rate equivalent to about 10% of samples collected and analysed. After the removal of the identified asbestos contaminated area, a qualified environmental consultant will collect 50 samples on a 5 m (and 1 m depth) grid basis from the walls of the excavation area.

With regard to the base of the excavation area, a qualified occupational hygienist will be required to visually inspect the floor and will either issue an asbestos clearance certificate if no suspect asbestos material or construction debris is found or may suggest further testing with possibly 16 sampling points as outlined in the above guidelines.

Based on the initial outcomes of visual inspection and laboratory results, further excavation works may be required to chase out asbestos-contaminated fill material. Any identified residual asbestos waste will need to follow the implementations specified in Sections 6.2 and 6.3 of this AMP.

A validation assessment report prepared by qualified consultants in accordance with NSW EPA Contaminated Sites *Guidelines for Consultants Reporting on Contaminated Sites* (1997) and other appropriate guidance documentation including the asbestos clearance certificate shall be submitted to the local council at the completion of the remediation works. The validation report shall confirm that the site has been remediated to a suitable standard for the intended waste facility and that no related adverse environmental effects have occurred as a result of the temporary works.

7. RECORD KEEPING AND FUTURE SITE WORKS

The validation report will provide records of the location and depths to asbestos contaminated soils on the site and would include a cell CQA report. This report will need to be included in the Asbestos Record held by the waste facility which it is understood outlines the locations of known asbestos contamination on the site. This record keeping is considered mandatory and forms part of the risk management process for the remediation of the site. The location of the asbestos contaminated soil may also need to be recorded on the planning certificate for the site if relevant.

All future site works undertaken after remediation is completed that may expose workers to the asbestos contaminated soils will need to be carried out in accordance with an approved post-construction Occupational Health Safety Plan. Any such works will also need to be undertaken by an appropriately licensed contractor.

8. MAINTENANCE REQUIREMENTS

The maintenance requirements include reporting of any disturbance to the capping material by the site workers will need to be addressed as soon as been rectified. The maintenance staff should be made aware of the importance of the capping and the risks associated with breaching the capping to ensure that maintenance is carried out immediately.

This maintenance requirement is considered mandatory and forms part of the risk management process for the remediation of the site.

9. CONTINGENCY PLANS AND UNEXPECTED OCCURENCES

It is noted that asbestos containing materials have been identified in filling soils in the eastern bund wall. In addition, trace of asbestos (below the reporting limit) has been identified in parts of the north eastern and south western bund walls.

Given the random nature of asbestos contamination in soil, the potential for presence of “residual” asbestos materials in the subsoils may not be completely ruled out. Therefore, in the event where asbestos material is detected in soils or in air borne fibres during the excavation of the bund walls, the following ‘Unexpected Asbestos Finds Protocol’ will apply:

- Upon discovery of suspected asbestos containing material, the site manager is to be notified and the affected area closed off with the use of barrier tape and warning signs. Warning signs shall be specific to Asbestos Hazards and shall comply with the Australian Standard 1319-1994 – Safety Signs for the Occupational Environment;
- The environmental consultant is to be notified to inspect the area and confirm the presence of asbestos and determine extent of remediation works to be undertaken.
- The Principal (or their representative) and the site manager will be informed of the works required.

The impacted soil will be excavated and relocated to the designated cell as described in Section 6. In the case of detected air borne fibres during the monitoring program, the above

procedures will apply. Moreover, all control measures such as the method of dust suppression will be reassessed until an acceptable level of asbestos fibres in air is reached.

If the capping system is accidentally breached, or damaged at any time without the prior preparation of specific works/management procedures (eg a works-specific EMP), access to the area must be immediately restricted through placement of barriers, or other appropriate means (i.e. PVC sheeting or clean fill) will be placed over the damaged area to prevent exposure to site users. The breach should be rectified as soon as possible and in accordance with the provisions as outlined in the AMP. All relevant paperwork/records should be completed in the event that the capping layer is breached including the Corrective Action Request Form (Appendix C).

10. OCCUPATIONAL HEALTH AND SAFETY PLAN

10.1 Objectives

The aim of the OHSP is to provide information regarding the potential environmental hazards, related training and safe work practices in association with the remedial works. The practices outlined must generally comply with the occupational health and safety (OH&S) policies specified by the relevant Authority and are the minimum requirements of OH&S at the site.

10.2 Site Induction

A nominated representative of the principal contractor will undertake the induction of all site personnel and contractors. The briefing will cover the general and specific (environmental) hazards anticipated at the site.

All site personnel must read and familiarise themselves with the AMP prior to initiating site work. A copy of the AMP (including this OHSP and others which may be developed by the contractors) must be maintained on site at all times.

All personnel and contractors working on site must be competent in the operation of all safety equipment used on-site. Designated personnel must be familiar with the operation of monitoring equipment on the site. Site personnel must also understand the potential hazards associated with the asbestos contaminated soils on site.

Induction of site workers will also be required to deal with the risks associated with long term maintenance.

10.3 Potential Asbestos Hazards at the Site

Asbestos contaminated soil should be managed in accordance with the requirements of WorkCover NSW. Asbestos must be managed by a contractor holding an AS-1 friable asbestos license. Asbestos air monitoring is also required as outlined in Section 6.2.2.

10.4 Safe Work Practices

All site personnel must be aware of WorkCover requirements with regard to confined spaces. Site personnel are not to enter confined spaces without a WorkCover certificate of competency. If a confined space is entered, the provisions of the site emergency response plan must be implemented.

Personnel must endeavour, wherever possible, to avoid direct contact with potentially contaminated material, including contaminated soil or wastes. Workers are to ensure that soils are not ingested or swallowed. Hands must be washed before eating or drinking and at the end of each shift.

In the event that personnel are required to work in areas of potential contact with asbestos contaminated soils, the following personal protective equipment (PPE) will be required:

- Disposable coveralls;
- Safety boots;
- Nitrile work gloves meeting AS2161-1978 requirements or heavy duty gauntlet gloves;

- Class P2 respiratory equipment;
- Safety glasses or safety goggles with side shields meeting AS1337-1992 requirements, if contact with splashed soil or materials is likely;
- Hard hat meeting AS1801-1981 requirements; and
- Hearing protection to AS1270-1988 requirements must be worn when working around machinery or plant equipment if noise levels exceed personal comfort levels or published levels for longer term exposure as specified by WorkCover.

Prior to leaving the work area, persons are to remove their PPE and proceed through the decontamination unit. Provided the cabin of the excavator is air conditioned (with appropriate air filtration unit) and the door is closed throughout the work, the operator of this machine does not need to wear the above PPE.

10.5 Emergency Contacts

Contact details for emergencies area shown the following table.

Name	Contact Details
Emergency Services: Fire Brigade, Ambulance and Police	Tel: 000
Nearest Medical Centre:	
Nearest Hospital:	
NSW DECCW	Pollution Line Tel: 131 555
Water Authority	Emergency Line: 13 20 90
Energy Australia	Emergency Line: 131 388
AGL	Emergency Line: 131 909

Note: This table should be completed and amended by the contractor prior to commencement of works.

A site specific OHSP should be compiled by the contractor for implementation by their own staff.

11. PERSONNEL AND RESPONSIBILITIES

11.1 Site Owner/Manger

It is the site owner's responsibility to implement this AMP and undertake all measures required to manage the site remediation process.

The site owner is responsible for the relocation and re-burial of asbestos waste as part of the site remediation process. The site owner may appoint a suitably qualified sub-contractor(s) with AS-1 licence to undertake the relocation and re-burial of asbestos waste as per Section 4. The site owner/sub-contractor must nominate a representative (e.g. site manager) who will be responsible for the undertaking/ overseeing the relocation and re-burial of asbestos waste.

It is also the responsibility of the site owner or his nominated representative (e.g. site manager) to issue all workers involved during the relocation and re-burial process with a copy of this AMP, and to ensure that they fully understand their responsibilities under the AMP and know whom they are required to contact regarding any issues relating to the AMP.

11.2 Contractors

11.2.1 Operational Contractors

All works associated with asbestos in soil will be undertaken by a contractor holding a class AS-1 License. The contractor shall ensure that all work on the site complies with the requirements of the following Acts:

- *Environmentally Hazardous Chemicals Act 1985* (NSW);
- *Occupational Health and Safety Act 2000* (NSW);
- *Protection of the Environment Operations Act 1997* (NSW); and
- *Protection of the Environment Operations Amendment (Waste) Act 2007* (NSW).

The operational contractor shall also be responsible to ensure that the site works comply with the following conditions:

- Fugitive dust, odours, vapours and noise are minimised within the site;
- Vehicles leaving the site shall be cleaned and secured so that mud, soil or water are not deposited on any public roadways or adjacent areas;
- Routine inspection of works; and
- An induction process for all site personnel that includes relevant information on environmental requirements and ensures that all personnel are familiar with the emergency procedures.

The key to effective management of incidents and emergencies is the suitability of the preventative actions taken before any situation reaches a reportable or critical level. Therefore, monitoring and surveillance activities are extremely important.

11.2.2 Environmental Consultant and Occupational Hygienist

The role of the environmental consultant includes the following:

- Attend full-time supervision at the site during remedial works for a period of one to two weeks;
- Conduct daily air monitoring for the duration of the remedial works as outlined in Section 6.2.2;
- Inspect and verify the capping layer;
- Undertake the validation assessment accompanied by a qualified occupational hygienist as described in Section 6.4; and
- Report on the above on completion of the remedial and validation works.

12. CONCLUSION

Subject to proper implementation of the AMP and validation reporting it is considered that the site can be made suitable for the intended waste facility. Short term exposure during remediation and construction works is unlikely to pose an unacceptable risk to workers providing the environmental controls and safety precautions outlined in this AMP are adhered to.

13. LIMITATIONS

Douglas Partners (DP) has prepared this AMP for this project at Erskine Park Quarry, Patons Lane, Orchard Hills in accordance with DP's proposal dated 7 May 2010 and acceptance received from Mr Rick Miller on behalf of Dellara Pty Ltd dated 10 May 2010. The work was carried out under DP Conditions of Engagement. This report is provided for the exclusive use of Dellara Pty Ltd for the specific project and purpose as described in the report. It should not be used by or relied upon for other projects or purposes on the same or other site or by a third party.

This report must be read in conjunction with the attached appendixes and should be kept in its entirety without separation of individual pages or sections. DP cannot be held responsible for interpretations or conclusions from review by others of this report or test data, which are not otherwise supported by an expressed statement, interpretation, outcome or conclusion stated in this report. In preparing this report DP has necessarily relied upon information provided by the client and/or their agents.

DOUGLAS PARTNERS PTY LTD

Reviewed by:

Wen-Fei Yuan
Environmental Scientist

J M Nash
Principal

APPENDIX A
Figures 1-3 & A

APPENDIX B
Site Induction Statement

**ASBESTOS MANAGEMENT PLAN
SITE INDUCTION STATEMENT**

Please Note: All Designated Site Personnel and Contractors To Sign an Individual Copy

I have read and understand the operational phase Asbestos Management Plan prepared for the site, and have attended the Site Induction Programme. I hereby agree to comply with the provisions of the above documents and environmental management and safety instructions given on the site.

Name:

Signed:

Position/Company:

Date:

Site Manager:

Date:

Countersigned:

APPENDIX C
Corrective Action Request

CORRECTIVE ACTION REQUEST FORM

Project:	No:
Organisation Issued To:	Date:

The items below relate to Environmental Issues that require corrective action	
Time for Correction:	
A .– Immediately B. – Close down work area C. – ASAP	D. – Within the week E. – Remove from site F. – As per site instruction

Issued by:	Position:
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Proposed Corrective Action/Proposed Preventative Action or Reason, if any, for non-action:
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Reviewed by:	Date:
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Proposed Corrective Action/Proposed Preventative Action Implemented and Effective:
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Followed up by:	Date:
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APPENDIX D
Environmental Incident Report Form

ENVIRONMENTAL INCIDENT REPORT FORM

Project:	No:
Date:	Time:

PART A			
<i>Type of Incident</i>		<i>Severity of Incident</i>	
Hazardous Material	<input type="checkbox"/>	Breach of EPA Licence Conditions	<input type="checkbox"/>
Contaminated Water Discharge	<input type="checkbox"/>		
Soil erosion	<input type="checkbox"/>	Breach of Environmental Offences & Penalties Act	<input type="checkbox"/>
Dust emissions	<input type="checkbox"/>		
Noise	<input type="checkbox"/>	Minor pollution event	<input type="checkbox"/>
Other	<input type="checkbox"/>		

PART B	
<i>Description and Cause of Incident:</i>	
Reported By:	Date:

PART C	
<i>Remedial Action Required:</i>	
Approved By:	Date: