

ASBESTOS MANAGEMENT PLAN

126 Kent Road, Marsfield NSW 2122

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Asbestos Management Plan

126 Kent Road, Marsfield NSW 2122

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1 INTRODUCTION

Arcadis Australia Pacific Pty Ltd (Arcadis) was commissioned by St Hilliers (NSW) Pty Ltd (St Hilliers) to prepare an Asbestos Management Plan (AMP) at 126 Kent Road, Marsfield NSW 2122 (herein known as 'the site') to address the conditions within the State Significant Development Approval (SSDA). The location of the subject site is shown on **Figure 1, Appendix A**.

1.1 Project Background

The site is currently occupied by Kent Road Public School, and Schools Infrastructure have a SSDA to undertake development and upgrade works to the school, subject to a number of planning conditions (Conditions B8, B9, B10, D26, D27 and D28 relate specifically to Site Contamination). Arcadis understands that building alterations and additions are currently proposed to be made on the area of interest on the site (see **Figure 1, Appendix A**) as part of ongoing school upgrades.

The site has no history of industrial or commercial use and accordingly does not have a high potential risk for extensive contamination and was used primarily for residential or educational purposes since 1960s. Prior to the 1960s, the site was used for agricultural purposes (potentially market gardens and orchards).

During intrusive investigations completed by Arcadis between 30 September and 2 October 2019, fragments of Potential Asbestos Containing Material (PACM) were observed to be scattered across some of the surface of the site. Ten fragments were collected and given their similarity in appearance; three representative fragments were analysed for asbestos. Laboratory analysis confirmed the material to be Asbestos Containing Material (ACM) and therefore the National Environment Protection Council (NEPM) criteria of no visible asbestos in surface soil was exceeded. ACM was identified and confirmed by laboratory analysis within the fill profile below 10 cm at three (3) of the thirty two (32) locations (TP1, TP4, and GB2) which exceeded the land use criteria of 0.01% (Residential with access to soils) with the results showing the following ACM concentrations:

- TP1 (0.054 w/w%);
- TP4 (0.019 w/w%); and
- GB2 collected from the garden bed (0.008 w/w%).

In addition to where bonded ACM has been reported, anthropogenic materials were observed within the fill material in approximately one third of the locations, comprising of tiles, brick, glass and general poor-quality fill building rubbish. The garden beds also appeared to contain poor quality fill with PACM visually observed in and around many of the raised beds.

Following the Further Supplementary Soil Contamination Assessment (Arcadis, November 2019), together with the preliminary SSDA conditions issued to Schools Infrastructure, the Department of Education (DoE) commissioned Arcadis to prepare a Remediation Action Plan (RAP) (10035770_RAP) to ensure that the site could be made suitable for desired land use. The RAP detailed a combined 'cap and containment' and 'excavation' approach to remediate the site to be suitable for the proposed upgrades and development.

1.2 Asbestos Containing Material

Asbestos is a term for a group of six naturally occurring mineral fibres belonging to two groups:

- Serpentine Group – comprised of only chrysotile (white asbestos); and
- Amphibole Group – comprised of anthophyllite, amosite (brown asbestos or grey asbestos), crocidolite (blue asbestos), tremolite, and actinolite.

Most Asbestos Containing Materials (ACM) found in the urban environment come in the form of bonded (non-friable) or commonly referred to as 'Fibro'. When bonded materials are exposed to certain conditions, the bonding agent (usually cement) can break down causing the bonded ACM to become friable. Asbestos only poses a risk to human health when asbestos fibres are made airborne and inhaled or ingested. When asbestos is bound in a matrix such as a cement or resin, it is not readily made

airborne except through substantial physical damage. Severe weathering or damage (including by vehicle movements) to bonded ACM may also result in the formation of friable asbestos (comprising fibrous asbestos (FA) and asbestos fines (AF)).

The Work Health and Safety (WHS) Regulations require that, where asbestos is identified as contaminating a workplace, a register and asbestos management plan be created for the site.

The management and remediation of sites contaminated with asbestos from illegal dumping, uncontrolled filling and demolition works is a specialised task. In some instances, site remediation may entail removal of asbestos and ACM from the site; in other cases, this may not be practicable, and other management strategies should be used. Engaging specialist asbestos removalists is highly recommended for all but the most minor of non-friable contaminations. For the removal and remediation of the asbestos at the site at 126 Kent Road, Marsfield, NSW 2122, a Class B contractor should be engaged.

A person with management or control of a workplace must ensure a written asbestos management plan (AMP) is prepared for the workplace if asbestos or ACM has been identified or assumed present or is likely to be present from time to time at the workplace. The asbestos management plan must be maintained to ensure the information is up to date.

2 LEGISLATION AND GUIDELINES

All works on the site must be undertaken with all due regard to the environment and to statutory requirements. Work on site is to comply with the requirements of the following NSW legislation and guidelines:

- SafeWork NSW; How to manage and control asbestos in the workplace - Code of Practice, 2019
- SafeWork NSW; How to safely remove asbestos - Code of Practice, 2019
 - The Codes of Practice are approved code of practice under section 274 of the Work Health and Safety Act (the WHS Act);
- Protection of the Environment (Operations) Act 1997;
- Protection of the Environment Operations (Waste) Regulation 2014;
- NSW Environment Protection Authority (2014) Waste Classification Guidelines;
- NSW Safework (2014) 'Managing asbestos in or on soil';
- National Environment Protection (Assessment of Site Contamination) Measure 1999 amended May 2013 (ASC NEPM 2013).

According to The Work Health and Safety Act 2011 (the WHS Act) Section 47 - *The WHS Act requires the person conducting a business or undertaking to consult, so far as is reasonably practicable, with workers who carry out work who are (or are likely to be) directly affected by a work health and safety matter.*

The presence of asbestos on the site and the existence of an AMP are to be explained to all site workers as part of the general site induction, and not only to those who may be completing asbestos related works. Refer to **Appendix B** for an example of an Induction Register.

Note that, discussion of asbestos issues in the induction is not to inform workers how to do work related to asbestos, as they are required to be licensed, rather it is to inform all workers that:

- Asbestos exists within the soils on the site;
- There exist requirements for works requiring the penetration of surfaces (E.g. drilling or cutting into existing surfaces);
- Intrusive earthworks or surface disturbance in areas of the site where asbestos has been identified will be undertaken;
- A copy of the AMP is to be maintained on site during the course of site works/operations.

3 ROLES AND RESPONSIBILITIES

A guide to the roles and responsibilities of the stakeholders is presented in the following sections.

3.1 Project Manager

The Project Manager (PM) nominated by St Hilliers who is responsible for the daily operations of the site, will be responsible for the implementation, maintenance and compliance with the requirements of this AMP. The PM or equivalent representative will be responsible for the following:

- Ensuring that all contractors who will undertake work on the site are inducted and understand the potential contamination issues related to this site.
- Maintaining the following records during the life of the project:
 - Details of all inducted personnel approved to undertake work on the site. As outlined in Section 5.2;
 - Records of unexpected finds on the site. This is further detailed in the Unexpected Finds Protocol (UFP) that is currently being prepared by Arcadis;
 - Assessment reports for the classification of soil (e.g. application for the disposal of soil as waste);
 - Records of approvals to remove or dispose soil from the site; and
 - Soil tracking information for material that is either removed from the site or brought to the site for use.

3.2 Site Workers / Sub-Contractors

Any sub-contractors engaged to conduct work on the site will be required to comply with the AMP by:

- Ensuring they are inducted and where appropriate, understand the requirements of the AMP.
- Undertake relevant training and/or be licensed to conduct their work.
- Report to the PM any occurrences of material suspected of containing asbestos.
- Undertake any tasks as required by the PM.

3.3 Environmental Consultant

A suitably qualified environmental consultant should be available to provide advice and support should material considered to be potential ACM be encountered. The primary responsibilities of the environmental consultant are as follows:

- When required, undertake an assessment of risk for material suspected of being ACM or contaminated by asbestos.
- Provide advice to the PM with regards to the management or disposal of contaminated soil. This may include recommendations for further assessment or disposal of contaminated material.
- When ACM is suspected, the material is to be sampled and tested, and then treated appropriately as a result of the testing.
- In the case that offsite disposal is either required or desirable, the environmental consultant shall:
 - Undertake sampling as required for the classification of contaminated material in accordance with the relevant legislation and guidelines;
 - Prepare correspondence for submission to the consent Authority and/or the Auditor (if required) for the removal of soil from the site, or the containment of the impacted soil on the site, within a containment cell. Arcadis notes that a RAP has been prepared for the site.

3.4 Licensed Asbestos Contractor

In accordance with the WHS Regulation 458:

A person conducting a business or undertaking who commissions the removal of asbestos at the workplace must ensure asbestos removal work is carried out only by a licensed asbestos removalist who is appropriately licensed to carry out the work, unless specified in the WHS Regulations that a licence is not required.

There are two types of licences: Class A and Class B, refer Table 3-1 below. The type of licence required will depend on the type and quantity of asbestos or ACM that is being removed at a workplace.

Table 3-1 Asbestos Licences

Type of Licence	What asbestos can be removed?
Class A	<p>Can remove any amount or quantity of asbestos or ACM, including:</p> <ul style="list-style-type: none"> Any amount of friable asbestos or ACM Any amount of Asbestos-contaminated dust or debris (ACD) Any amount of non-friable asbestos or ACM
Class B	<p>Can remove</p> <ul style="list-style-type: none"> Any amount of non-friable asbestos or ACM <p>Note: A Class B licence is required for removal of more than 10 m² of non-friable asbestos or ACM but the licence holder can also remove up to 10 m² of non-friable asbestos or ACM.</p> <ul style="list-style-type: none"> ACD associated with the removal of non-friable asbestos or ACM. <p>Note: A Class B licence is required for removal of ACD associated with the removal of more than 10 m² of non-friable asbestos or ACM but the licence holder can also remove ACD associated with removal of up to 10 m² of non-friable asbestos or ACM.</p>
No Licence Required	<p>Can remove:</p> <ul style="list-style-type: none"> Up to 10 m² of non-friable asbestos or ACM ACD that is: <ul style="list-style-type: none"> Associated with the removal of less than 10 m² of non-friable asbestos or ACM Not associated with the removal of friable or non-friable asbestos and is only a minor contamination.

For the removal and remediation of the asbestos at the site at 126 Kent Road, Marsfield, NSW 2122, a Class B contractor should be engaged.

Examples of tasks which typically do and do not require an appropriate licence are provided in Section 1.2 of the SafeWork Australia; How to safely remove asbestos - Code of Practice, 2018.

3.5 Reviewing the Asbestos Management Plan

The PM or Construction Manager must ensure the asbestos management plan is reviewed and, if necessary, revised at least once every five years or when:

- There is a review of the asbestos register or a control measure;
- Asbestos is removed from or disturbed, sealed or enclosed at the workplace;

- The plan is no longer adequate for managing asbestos or ACM at the workplace;
- A health and safety representative requests a review if they reasonably believe that any of the matters listed in the above points affects or may affect the health and safety of a member of their work group and the asbestos management plan was not adequately reviewed.

Based on the RAP (Arcadis, 28 November 2019), ACM impacted soils will be capped and contained underneath a building. This AMP is no longer applicable after these remediation works have been completed as the ACM impacted material within the containment cell and will be maintained under a separate operational phase Environmental Management Plan (EMP).

3.6 Accessing the Asbestos Management Plan

According to the requirements of WHS Regulation 429, the PM must ensure the AMP is readily accessible to:

- Workers who have carried out, carry out or intend to carry out work at the site;
- Health and safety representatives who represent workers that carry out or intend to carry out work at the site;
- A person conducting a business or undertaking who has carried out, carries out or intends to carry out work at the site; and
- A person conducting a business or undertaking who has required, requires or intends to require work to be carried out at the site.

The AMP should be kept at the site to ensure it is accessible.

4 ENVIRONMENTAL MANAGEMENT

4.1 Identification of Additional Material Suspected of Containing Asbestos

Asbestos or ACM have been detected in fill material at the site with the distribution being concentrated around the area to the west of the site, localised to the raised garden beds (shaded in red in **Figure 2, Appendix A**). In addition, fill materials located towards the southern portion of the site (shaded in blue in **Figure 2, Appendix A**) were observed to contain anthropogenic inclusions. The potential for additional ACM, therefore, cannot be discounted in all fill materials across the site.

Should additional material be encountered that is suspected of containing asbestos or other unexpected finds, then work must stop immediately, and the PM must be informed of the presence of the material. The following actions are to be undertaken:

- In accordance with WHS Regulation 422, a person with management or control of a workplace (in this case St Hilliers PM) must:
 - assume the material is asbestos or ACM if it cannot be identified but a Competent Person reasonably believes it is asbestos or ACM; and
 - assume asbestos is present if part of the workplace is inaccessible and it is likely to contain asbestos or ACM.
- WHS Reg 422(1) states that all asbestos or ACM at the workplace must be identified by a Competent Person so far as is reasonably practicable. If it is reasonably practicable to identify the asbestos (e.g. by inspection, sampling and analysis) then this should be undertaken;
- Material that is suspected of containing asbestos must be labelled or signposted as contaminated with asbestos in order to restrict access. Signs notifying site workers of the presence of asbestos must be placed on barricades around the area if uncontrolled, to limit the potential for inadvertent exposure. In addition to sign posting, dust suppression mechanisms should also be implemented;
- If friable asbestos is identified at any stage, then the occurrence should be assessed by a suitably qualified and experienced Licensed Asbestos Assessor (LAA).
- All suspicious material must be assumed to contain asbestos until it has been proven otherwise by laboratory analysis; and
- The mechanism for identification of all suspicious material and other unexpected finds should include supervision and regular inspection of the work by a Competent Person that is suitably trained, qualified and/or experienced to identify asbestos and any other relevant contaminants. This is to help ensure that unexpected finds can be identified prior to excessive disturbance and exposure/cross contamination. Supervision is required during excavation of the red and blue shaded areas defined in **Figure 2, Appendix A**.
- Once positively identified unexpected finds are to be surveyed by a Competent Person and logged in an Unexpected Finds Register. Further details on unexpected finds will be provided in the Unexpected Finds Protocol (UFP).

5 HEALTH AND SAFETY MANAGEMENT

5.1 AMP Audience and Availability

This AMP provides guidance for safe work practices to protect against possible adverse exposure to occurrences of possible ACM on the site. The AMP is to be made freely available to all onsite staff and sub-contractors whose work has the potential to come into contact with ACM on the site.

5.2 AMP Induction Requirements

Prior to commencing work on the site, especially that has been pre-classified as 'Special Waste – GSW' (the red shaded area in **Figure 2, Appendix A**), all workers must be inducted into the AMP.

The initial induction for staff of the St Hillier's nominated PM and other key contractor personnel must be done prior to commencing earthworks on the site.

The induction must outline the following topics:

- Details of the project;
- Brief history of the site;
- The possibility of contamination being present;
- How to identify material suspected of containing contamination;
- Procedures in the event suspicious material is encountered;
- Requirement for approval from the appropriate regulatory authority to remove any material from the site; and
- The location of, and access to this AMP.

Records of personnel inducted into the AMP must be maintained by the PM, until the conclusion of the project.

5.3 Personal Protective Equipment (PPE)

PPE plays a major role in the protection against exposure to asbestos. The recommended PPE that should be available to all workers whose work has the potential to result in contact with ACM includes:

- Safety glasses;
- Safety boots;
- Coveralls / long-sleeved short and long pants. The SafeWork NSW *Code of practice: How to safely remove asbestos*, August 2019, (p. 41) indicates that disposable coveralls rated type 5, category 3 (EN ISO 13982–1) would be suitable;
- Protective gloves;
- Dust masks to protect against inhalation of dusts and asbestos fibres. For example, a Class P2 or P3 filtered disposable half-face mask conforming to AS/NZS 1716:2003 'Respiratory Protection Devices (Table 4.2 therein); and
- Single use disposable coverall suit for protection against asbestos fibres.

It is the responsibility of the person in control of the site (PM from St Hilliers) to ensure that workers on the site have the appropriate PPE and that it is used when necessary. PPE must be inspected for damage, correctly fitted, cleaned and maintained.

Note that additional PPE to that listed above may also be required for specific occupational tasks, and / or in the event that potential ACM is encountered. For the latter, task specific guidance regarding additional PPE is to be provided by a LAA.

The PPE Requirements should be reviewed in consultation with the Asbestos hygienist after sufficient air monitoring data is available. The hygienist should also refer to other relevant data such as the available soil (fill) analysis results and other site inspection results.

All persons engaged in intrusive works within the vicinity of the affected area should wear respiratory protective equipment conforming to the requirements of AS/NZS1716-2003 Respiratory Protective Devices.

5.3.1 Using and Maintaining Respiratory Protective Equipment

Respiratory Protective Equipment (RPE) must be worn at all times in the asbestos removal areas and until the appropriate stage of personal decontamination. Respirators should be selected, used and maintained in accordance with AS/NZS 1715:2009 (e.g. Table 4.2 therein).

All workers undertaking any asbestos removal work must receive instruction and training in:

1. Fit testing/checking;
2. The importance of a correct facial fit;
3. The correct method of using their respirators;
4. The procedures for regular cleaning, inspection and maintenance of respirators before use; and
5. When to stop asbestos removal work and leave the area if they think their RPE is not working properly.

The respirator must be worn in accordance with the manufacturer's instructions and the coverall hood must go over the respirator straps. It should be examined in accordance with the manufacturer's instructions before use to ensure that it is not damaged and is in good working order. Respirator defects should be reported immediately to the asbestos removal supervisor. The pre-use examination should include an inspection of:

- The condition of the straps and face piece, including the seal and the nose piece;
- The condition of the exhalation valve; and
- A fit check.

Non-disposable respirators should be cleaned, disinfected and stored in a safe place away from the asbestos-contaminated removal area.

The length of time a particulate filter can be used for the asbestos removal work depends on the resistance to breathing and damage to the filter. The filter should be replaced if damaged or when resistance increases. A damaged filter must be replaced before resistance begins to increase. The replacement should be according to the manufacturer's instructions.

Certain brands of filters may not be usable after being exposed to certain conditions such as a full decontamination shower. Specific advice should be sought from the supplier regarding the effectiveness of a filter after being subjected to certain conditions.

All parts, including filters, valves and seals, should be inspected before and after each use. Respirator defects should be reported immediately to the supervisor for repair or replacement. A system of regular cleaning, inspection and maintenance of non-disposable respirators should be in place to ensure they are clean and in a safe working condition.

Records of all respirator issues, uses and maintenance should be kept up-to-date. At the end of a shift or at a break, as part of the decontamination process, ensure the respirator is taken off last.

5.4 Records

Detailed records must be kept regarding implementation of the AMP. The PM and their sub-contractors will maintain relevant records, including but not necessarily limited to the following:

- Records regarding correspondence relating to notification of site access issues including;

- Unauthorised access to site;
- Workers undertaking tasks without the proper induction; and/or
- Workers undertaking tasks without the appropriate licencing;
- Records regarding AMP familiarisation including:
 - Who has been familiarised with the requirements of the AMP including their signature confirming their understanding of the AMP requirements;
 - The name of their employer / organisation;
 - When the person was trained;
 - The name, signature and employer / organisation of the Supervisor who is confirming the AMP familiarisation has taken place; and
- Copies of any training certificates applicable to the type of work to be conducted at the site, conducted by the worker as it pertains to the requirements of the AMP.
- Records regarding maintenance and / or construction workers undertaking works with the potential to disturb soil (for example, names of contractors, personnel and companies, type and date of work, locations and depths, confirmation of asbestos awareness course training);
- Details of any potential ACM observed which is not recorded on the Site Asbestos Register and associated follow-up actions;
- Details of any environmental issues / complaints associated with any works pertaining to ACM or potential ACM (irrespective of the form of the communication), including the name and contact details of the person making the complaint, date and time of the complaint, and the associated corrective measures.

The complaint register along with all records are to be maintained on the Site and be available for inspection by the Regulator.

5.5 Management of Risks

Non-friable asbestos, previously referred to as 'bonded asbestos', in sound condition represents a low human health risk. However, friable asbestos materials or damaged, crumbling bonded asbestos, have the potential to generate, or be associated with, free asbestos fibres and therefore must be carefully managed to minimise the release of asbestos fibres into the air. Non-friable asbestos is asbestos that is bound in a matrix such as cement or resin. 'Fibro' is the most common form of non-friable asbestos. When in a sound condition, the potential for these materials to release fibres is relatively low.

Friable asbestos is usually in the form of loose asbestos that is not bound together. The most common forms of friable asbestos are thermal lagging used on steam pipes, boilers, as fire protection, ceiling insulation and the like, and raw asbestos waste from asbestos products manufacturing. Friable asbestos can usually be broken up or crumbled using hand pressure to generate free fibres. If it is disturbed, friable asbestos has the potential to generate significant quantities of airborne fibres, and because of this requires a high level of control.

Work that involves the disturbance of vegetation, soils or the movement of machinery on the site must be made aware of the potential for non-friable ACM becoming friable due to weathering, deterioration or machinery movement. This type of work will increase the risk of exposure levels.

5.6 Procedure for Management of Bonded Asbestos

Only workers who have been appropriately trained in asbestos removal techniques, that include identification, safe handling and suitable control measures, may conduct asbestos removal work or asbestos related work at a workplace. SafeWork Australia has published 'How to safely remove asbestos code of practice' (2018) which provides additional information on safety standards when removing asbestos.

For non-friable asbestos totaling greater than the equivalent of 10 m² of fibro sheet or fragments, only a class A or B asbestos removal license holder may conduct the asbestos removal work. If there is uncertainty about the quantity of asbestos material, a licensed removalist (Class A or Class B) must be engaged. All workers involved in removing fragments of non-friable asbestos constituting a total of greater than 10 m² of fibro, must hold current certification showing that they have successfully completed the approved non-friable removal course.

The following procedures must be followed to effectively manage the handling and movement of asbestos impacted soils (if encountered):

- Notify the regulator (SafeWork NSW) of any licensed asbestos removal work, ensuring the asbestos removal contractor is appropriately licensed.
- Set up of exclusion zone around asbestos impacted areas including visible signage notifying workers of the presence of asbestos within the area;
- Site inductions for workers conducting non-asbestos related work and workers handling the asbestos impacted materials or surface ACM;
- Emu bob (hand-picking) to remove ACM fragments from the surface by suitably qualified asbestos personal/contractor or personnel trained to handle ACM removal;
- All ACM should be double bagged in plastic bags identified with Asbestos labelling clearly marked on the outside;
- Suitable PPE including dust masks that conform to the Australian/New Zealand Standard 1715 Selection, Use and Maintenance of Respiratory Protective Equipment (usually a class P2 filter, twin strap disposable respirator is appropriate for non-friable asbestos) must be worn along with cut resistant gloves. Disposable coveralls should be used to prevent the contamination of clothing and footwear. The SafeWork NSW *Code of practice: How to safely remove asbestos*, August 2019, (p. 41) indicates that disposable coveralls rated type 5, category 3 (EN ISO 13982–1) would be suitable. All PPE should be a 'wear once only' usage. Keep the respirator on until the work session has been completed, the cleaning is done, and contaminated clothing and PPE has been removed, bagged and sealed;
- Any machinery (i.e. excavators and / or trucks) that are required to conduct work on the site will need to be enclosed (windows wound to the full up position) with re-circulatory air functioning. Machinery should be fitted with air filters that capture airborne asbestos fibres such that air in the operator's cabin is, to the extent reasonably practicable, maintained free of airborne asbestos fibres. Movement outside of the vehicle should be conducted with the required PPE. Equipment and PPE must be handled as outlined in Section 5.3;
- Excavation of service trenches or other earth disturbing activities should have the additional procedures undertaken;
 - Air monitoring during removal of asbestos impacted soils;
 - Excavation of asbestos impacted soils to ensure full removal of impacted soils by Class-B licensed removalists;
 - Movement of impacted materials directly from work zone via tip truck to the containment cell. No long-term stockpiling of impacted soils is permitted. Stockpiling of impacted soils, unless conducted on appropriately sealed ground requires additional sampling of the stockpile footprint to ascertain that no residual impacted soils are present onsite;
 - Wetting down of materials during excavation works, transportation, backfilling and surrounding areas while excavation of impacted soils occurs; and
 - Provide and maintain a decontamination area for workers and vehicles. Ensure that the installation of decontamination facilities are compliant with the relevant code of practice.

Refer to the WHS Regulation and relevant codes of practice (See Section 2) for additional requirements that have not been specified in this section.

5.7 Procedure for the Disposal of ACM Material

No ACM impacted soils are planned to be disposed of off-site as the impacted soils will be relocated to a containment cell beneath one of the proposed building blocks which is located on-site. However, if there is a requirement to dispose of asbestos waste off-site the following should be undertaken.

If material is to be disposed to landfill, the assessment and classification and subsequent disposal must be in accordance with the applicable NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*. This may involve analytical testing for the site chemicals of concern. Provisions for temporary storage of excess spoil in an environmentally responsible manner prior to disposal must be undertaken, including:

- Dust suppression;
- Placement of material on a sealed or plastic lined surface;
- Covering of all excavated/stockpiled material; and
- Construction of sediment retention features around stockpiled materials.

Asbestos waste must be disposed in accordance with the regulatory requirements under clause 42 of the Protection of the Operations (Waste) Regulation 2014 which apply to asbestos waste and includes:

- Asbestos waste stored onsite prior to disposal must be done so in an environmentally safe manner;
- Non-friable asbestos must be securely packaged at all times;
- Friable asbestos (if encountered) must be kept in a sealed container;
- Asbestos contaminated soil must be wetted down;
- All asbestos waste must be transported in a covered, leak-proof vehicle (applicable to asbestos impacted soil);
 - This requirement should be adopted for both onsite and offsite transport of asbestos waste;
- Asbestos waste can be disposed of:
 - Onsite if regulatory and development approval is secured prior to the disposal; or
 - At a landfill site that can lawfully receive this waste. It is recommended that the landfill is contacted beforehand to find out if the facility can receive the waste and whether there may be any special requirements;
- It is illegal to dispose of asbestos waste in domestic garbage bags;
- It is illegal to re-use, recycle or dump asbestos waste.

If friable asbestos waste requires disposal, then only a person with a Class A removal license is permitted to remove the waste material and air monitoring will be required to be undertaken by a LAA.

If more than 100 kg of asbestos waste or 10 m² of asbestos sheeting is proposed to be removed from the Site, then information is to be provided to the EPA, under the NSW EPA Asbestos and Waste Tyre Guidelines 2015. This guideline contains the legal requirements that consignors, transporters and occupiers of premises must meet in addition to the Waste Regulations.

It is recommended that the requirements provided within the guidelines for the offsite transport and disposal of asbestos or other waste types are similarly adopted, as appropriate, as best practice for management of the onsite transport and disposal of asbestos and inert wastes.

From the guidelines, the following requirements for transporting Asbestos Waste are noted:

- A transporter of Asbestos Waste must be registered as a transporter of Asbestos Waste on WasteLocate before any transport of Asbestos Waste is to occur.
- The transporter of Asbestos Waste must provide the following information to the NSW EPA upon registration on WasteLocate (<https://wastelocate.epa.nsw.gov.au>) no later than on delivery of its first load of Asbestos Waste to the receiving facility:

- Name and address of the transporter;
 - Mobile telephone number of the transporter's registered driver;
 - Email address of the transporter;
 - Trading name or agency name of the transporter;
 - Drivers licence number of the transporter's registered driver;
 - Postal address of the transporter, if different from address;
 - Primary telephone number of the transporter;
 - The Australian Business Number (ABN) for the transporting company (if the entity has an ABN); and
 - WorkCover licence number of the transporter, if held.
- The transporter of a load of Asbestos Waste must provide the following information to the NSW EPA by using WasteLocate before the transportation of any load of Asbestos Waste:
 - The type of Asbestos Waste in the load;
 - Vehicle registration; and
 - Number of the vehicle driven by the transporter's registered driver for the specific consignment.

5.8 Clearance and Inspections Reporting

Asbestos clearance inspections will be undertaken at the following milestones:

- After all the fill has been placed within the containment cell/removed offsite; and
- After weekend excavation works are finished but before school commences. This to ensure that there are no human health risks for the users of the school.

An asbestos clearance certificate verifies that the following steps have been taken:

- Air monitoring during removal works;
- Testing of settled dust samples in a NATA accredited laboratory;
- A visual inspection to ensure asbestos containing materials have been removed effectively; and
- The removal work is consistent with the Code of Practise.

The clearance must be undertaken by an independent LAA for Class A works or an independent Competent Person for Class B works. The LAA or Competent Person must not be involved in the removal of the asbestos and is not involved in a business or undertaking involved in the removal of the asbestos. A clearance certificate can only be issued when the assessor satisfied that the asbestos removal area and the area immediately surrounding it are free from visible asbestos contamination.

The regulations (How to safely remove asbestos, SafeWork2019) state that unauthorised persons cannot enter the asbestos removal work area until a clearance certificate has been issued. Any protective barricades need to remain in place until all asbestos removal work is finished, and the final clearance certificate has been issued.

6 HEALTH AND SAFETY (ASBESTOS MATERIAL ASSESSMENT AND REMOVAL)

This section describes the process that should be considered prior to undertaking any earthworks. ACM at the site requires careful management in order to mitigate potential health risks to occupants of the site.

Planning requirements for the removal of ACM can differ greatly, depending on the specific asbestos removal task, the type, location, quantity and condition of the ACM to be removed, whether there are workers or other persons nearby and many other factors. Any misunderstanding could lead to the use of unsafe removal methods, potentially endangering the health of asbestos removal workers, persons in adjoining properties and local residents.

6.1 Potential Exposure Pathways

Workers involved in disturbing the known impacted soil, and surrounding stakeholders, could be exposed by:

- Respiration of dust or potential fibres generated from the soil;
- Dermal contact with asbestos contaminated soils;
- Ingestion of asbestos contaminated soils; and
- Possible secondary exposure from contaminated equipment or clothing.

Planning of the earthworks involving exposure and / or disturbance of ACM impacted soils that has been pre-classified as 'Special Waste – GSW' (the red shaded area in **Figure 2, Appendix A**, including any unexpected finds) and implementation of appropriate health and safety measures, will minimise the potential for contact with contaminated materials through the above listed pathways.

All machinery (i.e. excavators and / or trucks) that are required to conduct work on or pass over the site will need to be enclosed (windows wound to the full up position) with re-circulatory positive pressure cab. Machinery should be fitted with air filters that capture airborne asbestos fibres such that air in the operator's cabin is, to the extent reasonably practicable, maintained free of airborne asbestos fibres. Movement outside of the vehicle should be conducted with the required PPE. Equipment and PPE must be handled as outlined in Section 5.3 and 7.4 unless done in a designated clean area of the site.

6.2 Training Requirements

If not already covered in the general site induction the person in control of the site must ensure that information, training and instruction provided to a worker is suitable and adequate, having regard to:

- The nature of the work carried out by the worker;
- The nature of the risks associated with the work at the time the information, training or instruction is provided; and
- The control measures implemented.

The person in control of the site must, so far as is reasonably practicable, ensure the information, training and instruction is provided in a way that is readily understandable by any person to whom it is provided.

The person in control of the site must ensure workers who they reasonably believe may be involved in asbestos removal work in the workplace or the carrying out of asbestos-related work are trained in the identification, safe handling and suitable control measures for ACM, Friable Asbestos (FA) and Asbestos Fines (AF).

This training should include the following topics:

- Purpose of the training;

- Health risks of asbestos;
- Types, uses and likely presence of asbestos in the workplace;
- The worker's roles and responsibilities under the asbestos management plan;
- Where the AMP is located, how it can be accessed and how to understand the information contained in it;
- Processes and safe work procedures to be followed to prevent exposure, including exposure from any accidental release of airborne asbestos;
- Where applicable, the correct use of PPE including Respiratory Protective Equipment (RPE);
- The implementation of control measures and safe work methods to eliminate or minimise the risks associated with asbestos to limit the exposure to workers and other persons;
- Exposure standard and control levels for asbestos; and
- Purpose of any exposure monitoring or health monitoring that may occur.

The training for earthworks contractors is more general than the training that a worker undertaking asbestos removal work would receive. Further information on these specific training requirements is available in the Code of Practice: How to Safely Remove Asbestos (2018). Records of all training must be kept while the worker is carrying out the work and for five years after the day the worker stops carrying out the work. These records must also be available for inspection by the regulator.

6.2.1 Worker Induction

The person in control of the site will work with contractors to ensure a site-specific induction is provided for all workers before starting work.

This induction must outline:

- The expectations outlined in this AMP, including all policies and procedures;
- The emergency meeting point;
- The site rules;
- The facilities;
- Any site-specific hazards;
- High risk construction work activities; and
- Explanation of the Unexpected Finds Protocol

6.2.2 Worker Training

The person in control of the site will:

- Ensure workers are trained and competent for the work to be carried out;
- Ensure workers are trained to deal with any risks associated with the work and understand the control measures in place;
- Ensure all workers have had relevant white card training (or other appropriate training from another jurisdiction);
- Ensure on-site training and supervision is provided;
- Organise external training for specific tasks where required;
- Seek high risk licences for all high-risk work and maintain a register of licences; and
- Communicate with other contractors to ensure their workers are appropriately trained and competent.

6.3 Required Preparation Works

Prior to exposing and/or disturbing the known or potential ACM impacted soils by intrusive earthworks or excavation works, the following activities should be carried out and implemented by the party responsible for the disturbance of soil in the affected areas:

- Notify the regulator (SafeWork NSW) of any licensed asbestos removal work, ensuring the asbestos removal contractor is appropriately licensed.
- Notification to the person in control of the site to discuss the scope of works to be undertaken, the likelihood of generating dust, excess spoil or waste and the management of this material;
- Ensure contractors / workers are aware of the potential for asbestos contaminated materials to be encountered;
- Setup of work area, and exclusion zone including appropriate signage and barriers;
- Installation of decontamination facilities compliant with the relevant code of practice;
- Assess proposed scope of works to minimise the requirement to expose and / or excavate asbestos contaminated materials;
- Ensure contractors / workers, where any works involving asbestos contaminated materials is expected or identified, are conducted by an appropriately qualified person as required by the relevant legislation (i.e. Class-A or Class-B licensed contractor). Actual works will be undertaken by a Class A or Class B licensed contractor;
- Preparation of a specific occupational health and safety plan that caters for the proposed activities / works including the provision of PPE (refer to Section 5.3);
- Consideration and/or preparation of a Dust Management Plan to mitigate/minimise dust generation;
- Consideration of the equipment used to minimise potential soil exposure and dust generation;
- Preparation of a specific environmental protection plan including soil, water and air management protocols;
- Preparation of a methodology for managing excavated soil; and
- Contingency planning to include encountering other suspected asbestos impacted material other than that expected.

It is noted that the information provided in this AMP, although it may be common to other tasks, is generally limited to managing works associated with the disturbance of the known and potentially impacted ACM soils, identified in **Figure 2, Appendix A** (shaded in red and potentially blue). Planning and implementation of earthworks will also need to consider other environmental, health and safety risks associated with the specific task to be undertaken at that specific location.

6.4 Health and Air Monitoring

Health and air monitoring must be undertaken when a worker is at risk of exposure due to work that is not licensed asbestos removal work and is required per the WHS Regulation (e.g. Regulations 435 to 444 and Regulations 368-378). The need for health and air monitoring of these workers should be determined on the basis of the potential for exposure, frequency of potential exposure and duration of the work being undertaken.

Consideration must be given to the worker's demographic, medical and occupational history and records of the worker's personal exposure. The health and air monitoring must include a physical examination of the worker with emphasis on the respiratory system, including standardised respiratory function tests, unless another form of health and air monitoring is recommended by a registered medical practitioner. Workers must be informed of any health and air monitoring requirements before the worker carries out work that may expose them to asbestos.

All areas or equipment with asbestos or ACM in situ should be assessed by a Competent Person to determine the appropriate inspection periods to ensure risk controls are effective. Inspection periods are to be identified on the Asbestos Register and organised by the PM responsible for the area. An example of an Asbestos Register is provided in **Appendix C**.

Air monitoring for asbestos exposure may be required as result of the assessment and should be conducted by a Competent Person in accordance with *Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition* [NOHSC:3003(2005)].

Exposure standards set out the airborne concentrations of asbestos, which should not damage the health of workers. The exposure standards for asbestos are:

- Amosite (brown asbestos) 0.1 f/mL (Fibres per millilitre of air);
- Crocidolite (blue asbestos) 0.1 f/mL; and
- Chrysotile (white asbestos) 0.1 f/mL.

Any situations or areas which exceed the asbestos exposure standard are to be controlled to eliminate or minimise risk of exposure.

Note that the WHS Regulation 420 requires that exposure of a person at the workplace to airborne asbestos is eliminated so far as is reasonably practicable. As such, control should commence at detection of airborne asbestos fibres (i.e. 0.01 f/mL). Controls should be commensurate with the degree of risk.

6.4.1 Site Specific Health and Air Monitoring

Due to the site operating as a primary school, air monitoring will be required during school hours, in addition to being required each day of excavation works, to check that there is no risk to the children. Arcadis understand that the excavation and remediation work will only be undertaken on weekends and over school holidays. A clearance certificate where the asbestos removal work was undertaken must be provided by a LAA to clarify that the site is safe to attend, before the school children can return to the site.

The number of air monitoring points should be determined by the person conducting the monitoring and must be continued until a LAA has advised that air monitoring can be decreased. Air monitoring should not cease until all relevant clearance certificates have been issued and installation of an appropriate capping material over the asbestos containment cell has been achieved and confirmed by a suitably qualified and experienced environmental consultant. A conceptual design and an approximation of the geometry of the containment cell have been specified in the RAP (Arcadis, 28 November 2019).

7 HEALTH AND SAFETY (EARTHWORKS AND EXCAVATION WORKS)

7.1 Personal Protective Equipment (PPE)

PPE shall be used, maintained and disposed of in accordance with Section 5.3 of this AMP.

7.2 Safe Work

To avoid any adverse impacts to site personnel, the minimum PPE requirements given in Section 5.3 should be adhered to at all times within the identified 'working' area. Any disposable "dirty" PPE shall be removed, double bagged and disposed to an appropriately licensed landfill.

On leaving the designated ACM impacted working area, all personnel should remove and dispose of their PPE wash their hands and face thoroughly, including prior to using the toilet, smoking, eating or drinking.

7.3 On-site Management

The overall objectives of the strategy to be adopted for management of ACM contaminated soils at the affected areas are:

- Ensure supervision and regular inspection of the work by a Competent Person that is suitably trained, qualified and/or experienced to identify asbestos and any other relevant contaminants. This is to help ensure that unexpected finds can be identified prior to excessive disturbance and exposure/cross contamination. Supervision is required during excavation of the fill material onsite.
- Ensure all works involving the disturbance of the ACM contaminated soils are conducted under the supervision or are conducted by a suitably qualified Class A or Class B asbestos licensed contractor;
- Ensure wetting down of soils to reduce the potential generation of dust;
- Undertake the required air monitoring;
- Minimise erosion at the site, including erosion of soils exposed during excavation and demolition works;
- Protect nearby receiving environments from potential contamination;
- Prevent the re-contamination of areas in which excavation works have been completed via migration of surface water;
- To comply with all regulatory requirements; and
- To facilitate the implementation of the excavation and / or decommissioning programs.

7.3.1 Soil Management

The specific objective of the management of soils relates to the minimisation of cross-contamination to other areas of the site. Measures that can assist in this aspect of site management include, but are not limited to:

- Ensure that machinery that may have been in contact with the ACM impacted material is kept within the footprint of the containment cell until all piling works and placement of the marker and sand layers have been undertaken. After this, ensure that the machinery is decontaminated;
- Ensure contaminated site plant are decontaminated prior to commencing work in clean soil. Plant should undergo a clearance inspection prior by a Competent Person(s) before moving into any 'clean' area of the site;
- Signs and record keeping should indicate the origin and location of contaminated materials;

- No stockpiling of impacted soils (where possible) to prevent cross contamination of clean soils.
- Direct transport from contaminated area to burial site;
- Wetting down area during excavation and dumping within burial pits;
- Use appropriate waste receptacles for maintenance waste;
- Minimisation of areas of exposed soils, wherever possible, by staging the works, or covering with geotextile warning layer;
- Validated areas should be isolated to prevent cross contamination; and
- Routine site inspections by a Competent Person(s) that is suitably trained, qualified and/or experienced to identify asbestos and any other relevant contaminants.

7.3.2 Air Quality Management

Earthworks and excavation procedures have the potential to generate significant amounts of dust including free asbestos fibre. Possible dust-generating activities include major earth excavations and vehicle movement. The generation of dust should be minimised and meet relevant air quality standards as specified in the NOHSC:1003 (1995) *Adopted National Exposure Standards for Atmospheric Contaminants in the Occupational Environment*.

Dust control measures that may need to be instigated include:

- Minimising volume and area of disturbance;
- Treatment of soil with an appropriate wetting agent before disturbance;
- Using dust suppression during excavation and covers on soil stockpiles;
- Installing wind barriers;
- Using sheltered areas wherever possible;
- Minimising access to contaminated areas, especially by vehicles;
- Monitoring meteorological conditions and modifying or stopping work when they are adverse;
- Regulating the speed of vehicles;
- Implementing a community dust complaint and response system.

Air monitoring when disturbing the soils across the site should be implemented. Any air monitoring of asbestos should be performed in accordance with the NOHSC:3003 (2005) *Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres*.

Air monitoring up and down wind of the asbestos impacted area at the exclusion zone boundary should be implemented (with air monitoring filters to be situated at the boundary of the exclusion zone and also within 10m of the asbestos removal work) in conjunction with secondary monitoring locations whilst moving or disturbing asbestos impacted soils. Monitoring is normally limited to locations along the boundary of the exclusion zone, decontamination areas and the lunchroom.

The action level for detectable airborne asbestos has been defined in Section 6.4 to be 0.01 f/mL. If airborne asbestos is detected above this level everyone (children and adults) will be required to vacate the area, regardless of work environment.

Further details on site specific air monitoring requirements have been provided in Section 6.4.1.

7.4 Decontamination

Decontamination for the work area, workers, PPE and tools used in asbestos removal work is an important process in eliminating or minimising exposure to airborne asbestos fibres, particularly to persons outside the asbestos removal work area. The code of practice list two types of decontamination procedures that may be used:

Wet decontamination, or **wet wiping**, involves the use of damp rags to wipe down contaminated areas. Cleaning rags should only be used once, although they may be re-folded to expose a clean surface. The rags should be used flat and should not be wadded. If a bucket of water is used, the rags should not be re-wetted in the bucket, as this will contaminate the water. Care should be taken to avoid any potential electrical hazards when using this procedure.

Dry decontamination should be only used where wet methods are not suitable or pose a risk because of other hazards such as electricity or slipping. Dry decontamination procedures include carefully rolling or folding up and sealing plastic sheeting and/or vacuuming the asbestos work area with an asbestos vacuum cleaner. Large pieces of asbestos debris should be wetted and picked up by hand rather than vacuumed.

7.4.1 Decontamination of Tools, Equipment, or Machines

All tools / equipment used during earthworks / excavations of asbestos impacted soils should be fully dismantled (where appropriate), cleaned under controlled conditions and decontaminated using either the wet or dry decontamination procedures before they are removed from the removal work area. The method chosen will depend on its practicality, the level of contamination and the presence of any electrical / mechanical hazards.

If tools cannot be decontaminated in the asbestos impacted work area, or are to be reused at another asbestos impacted work area, they should be:

- Tagged to indicate asbestos contamination; and
- Double bagged in asbestos labelled bags before removing from the asbestos removal work area.

The bags containing the tools must remain sealed until decontamination or the commencement of the next asbestos maintenance or service task where the equipment can be taken into the removal work area and reused under full control conditions.

PPE should be worn when opening the bag to clean or reuse the equipment or tools, and decontamination should only be performed in a controlled environment.

In some circumstances, it may be better to dispose of contaminated tools and equipment, depending on the level of contamination and the ease of replacement.

All machinery (i.e. excavators and / or trucks) that are required to conduct work on or pass over the site will need to be enclosed (windows wound to the full up position) with re-circulatory air functioning working. Machinery should be fitted with air filters that capture airborne asbestos fibres such that air in the operator's cabin is, to the extent reasonably practicable, maintained free of airborne asbestos fibres. Movement outside of the vehicle should be conducted with the required PPE unless done in a designated clean area of the site.

All machines used during earthworks / excavations of asbestos impacted soils should be fully dismantled (where appropriate), cleaned under controlled conditions and decontaminated using either the wet or dry decontamination procedures before they are removed from the removal work area. The method chosen will depend on its practicality, the level of contamination and the presence of any electrical / mechanical hazards.

7.4.2 Personal Decontamination Procedures

Personal decontamination involves the removal of all visible asbestos dust/residue from PPE and RPE. Personal decontamination must be undertaken each time a worker leaves the asbestos removal work area and at the completion of the asbestos maintenance or service work. Personal decontamination should be done within the asbestos removal work area to avoid recontamination. Personal decontamination should be carried out where a decontamination unit is not necessary such as during minor or small-scale removal and maintenance work.

Asbestos-contaminated PPE must not be transported outside the asbestos removal work area except for disposal purposes. Before work clothes and footwear worn during asbestos removal work are removed from the asbestos removal work area for any reason, they should be thoroughly vacuumed

with an asbestos vacuum cleaner to remove any asbestos fibres and the footwear should also be wet wiped.

PPE should be used until all contaminated disposable coveralls and clothing has been vacuum cleaned and/or removed and bagged for disposal and personal washing has been completed. Any PPE used while carrying out asbestos removal work must not be taken home by a worker.

Personal hygiene and careful washing are essential. Particular attention should be paid to the hands, fingernails, face and head. Personal Decontamination procedures are provided in Table 7-1, below.

Table 7-1 Personal Decontamination (SafeWork Australia, October 2018)

Personal Decontamination

- Remove any visible asbestos dust/residue from protective clothing using an asbestos vacuum cleaner or wiping down with damp cloths. Do not reuse or resoak damp cloths.
- Carefully remove disposable protective clothing and place into bags (RPE must still be worn).
- Place cloths into disposal plastic bags (200 µm thick).
- Take disposable coveralls off and place into disposal bags (RPE must still be worn).
- Use damp cloths to wipe down footwear and place cloths into disposal bag.
- Seal all plastic bags with duct tape and place each into a second plastic bag.
- Seal this second plastic bag and label/mark as 'Asbestos Waste'.
- Use damp rags to wipe external surfaces of the disposal bags to remove any dust before it is removed from the asbestos removal work area.
- Remove PPE and double bag, seal with duct tape and mark as 'Asbestos Waste'.
- Remove non-disposable PPE and place in container labelled as containing asbestos.
- Remove RPE and double bag, seal with duct tape and mark as 'Asbestos Waste'.
- Ensure the outside of the bags are decontaminated by using a damp cloth.
- Place the damp cloth into disposable bags.
- Dispose of asbestos waste at the appropriate waste facility

7.5 Additional Health and Safety Controls for the Bored Piling Process

In the case that ACM impacted materials are penetrated, exposed or must be moved around due to the bored pile installation requirement underneath Block R, the following controls must be implemented.

- Piling must only be undertaken outside of school hours to reduce the risk of ACM exposure to the school children.
- Soils around the pile locations must be moistened using a mist curtain.
- Air monitoring is required.
- Drill spoil from the installation of the bored piles must be disposed of off-site as 'Special Waste – GSW' to an appropriately licenced landfill.
- A class A contractor should be engaged since there is a possibility that ACM pieces will be releasing asbestos fibres as a result of the drilling process.

8 VARIATIONS TO THE AMP

Should site conditions change which require an amendment to the AMP, then the variations should be completed by a suitably qualified environmental consultant. See Section 3.5 for details on the requirements for reviewing and revising the AMP.

Any variations to the AMP must be documented. St Hilliers and their nominated representative will be responsible to ensure all revisions to the AMP are appropriately distributed.

When a Construction Environmental Management Plan (CEMP) is prepared for the site, it is intended that this AMP will be included as an appendix.

9 REFERENCES

- Arcadis Australia Pacific Pty Ltd (Arcadis, 27 April 2018) Preliminary Site Investigation
- Arcadis Australia Pacific Pty Ltd (Arcadis, 30 July 2018) Due Diligence Soil Contamination Assessment
- Arcadis Australia Pacific Pty Ltd (Arcadis, 11 November 2019) Further Supplementary Soil Contamination Assessment
- Arcadis Australia Pacific Pty Ltd (Arcadis, 28 November 2019) Remediation Action Plan
- Arcadis Australia Pacific Pty Ltd (Currently being prepared) Unexpected Finds Protocol
- Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC:2002(2005)]
- National Environment Protection Council (NEPC, 10th December 1999) as amended 11th April 2013, *National Environment Protection (Assessment of Site Contamination) Measure* [NEPM].
- NSW Office of Environment & Heritage (NSW OEH, August 2011) *Guidelines for Consultants Reporting on Contaminated Sites*.
- NSW Environment Protection Authority (NSW EPA, November 2014) *Waste classification guidelines Part 1: Classifying waste*
- NSW WorkCover (2014) *Managing Asbestos in or on Soil*.
- Protection of the Environment (Operations) Act 1997;
- Protection of the Environment Operations (Waste) Regulation 2014; and
- Work Health and Safety Regulation 2011.
- SafeWork NSW; How to manage and control asbestos in the workplace - Code of Practice, 2019
- SafeWork NSW; How to safely remove asbestos - Code of Practice, 2019

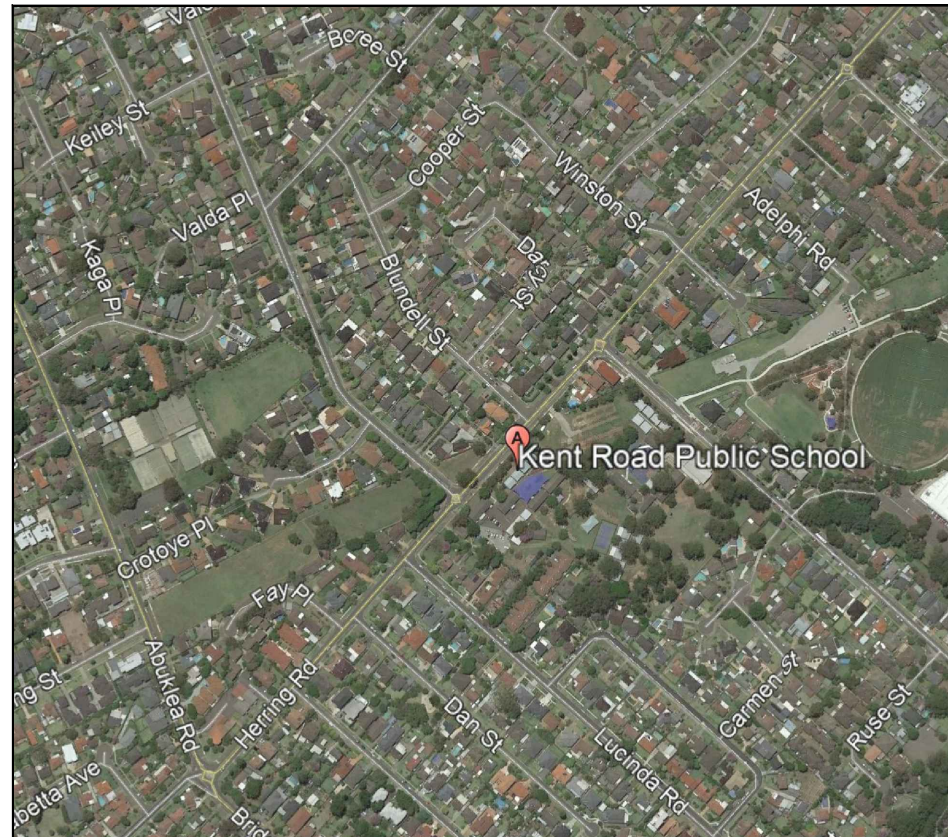
APPENDIX A FIGURES

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COUNTRY



REGION



SITE LOCATION



LEGEND:

--- Site Boundary



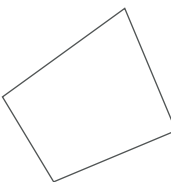
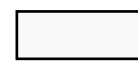





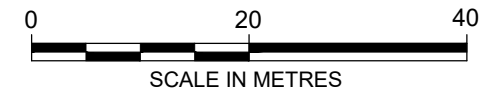
KENT ROAD PUBLIC SCHOOL- 126 KENT ROAD
MARSFIELD, NSW, AUSTRALIA

SITE LOCATION PLAN



LEGEND:

-  Site Boundary
-  Test Pit Location
-  14 m Grid
-  GSW CT1 Recyclable
-  GSW due to TRH exceedance
-  GSW CT1 Recyclable.
Providing no ACM is observed when
excavating anthropogenic material
observed in fill
-  Special Waste with GSW matrix



KENT ROAD PUBLIC SCHOOL- 126 KENT ROAD
MARSFIELD, NSW, AUSTRALIA

**SITE LAYOUT AND INDICATIVE WASTE
CLASSIFICATION**

APPENDIX B INDUCTION REGISTER

Asbestos Management Plan

Date	Inductor				Inductee			
	Name	Company	Position	Signature	Name	Company	Position	Signature

APPENDIX C ASBESTOS REGISTER

Asbestos Management Plan

Asbestos Register					
Workplace address: 126 Kent Road Public School, Marsfield, NSW, 2122					
Date	Type of asbestos	Friable / not friable	Condition	Location	Accessible area?

