

# **Asbestos Management Plan**

In support of Licence Amendment Application

## LOT 821 (501) ALEXANDER DRIVE, MIRRABOOKA WA 6061



Prepared for: Brajkovich Landfill & Recycling Pty Ltd

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Abbreviation	Definition
ACM	Asbestos Containing Materials
AF	Asbestos Fines
AMP	Asbestos Management Plan
C&D Waste	Construction & Demolition Waste
CBD	Central Business District
DWER	Department of Water and Environmental Regulation
DoH	Department of Health
FA	Fibrous Asbestos
MRS	Metropolitan Regional Scheme
SERS	Site Environmental and Remediation Services (WA) Pty Lto
the Site	LOT 821 (501) ALEXANDER DRIVE, MIRRABOOKA WA 6061



## **Executive Summary**

This Asbestos Management Plan (AMP) has been developed in support of operations associated with the definition of a Solid Waste Depot proposed at a Site located at 501 Alexander Drive, Mirrabooka WA 6061 (Hereby known as 'the Site). This document was prepared to aid the identification and management of Asbestos onsite during waste acceptance, sorting and storage operations of the above-mentioned works.

It is proposed within this License amendment Report that the Site is to be utilised as a solid waste Depot as an ancillary use to the existing license held (L6764/1997/14). It is a general requirement for sites of this nature to have an AMP in place as well as an obligation of the PCBU under the *Work Health and Safety Act* (WA 2020). It is proposed that sorting of materials for waste recovery will occur with the sorting of conforming material for recycling purposes and the export of non-conforming materials.

Methods and procedures to identify suspected ACM are recommended for application throughout the transport and sorting. The objectives of these procedures and controls are to ensure that all work is carried out to minimise occupational emissions of asbestos free fibres as best as can be reasonably practiced negating risk to human or environmental health both to the site and the wider community.



## 1 Introduction

Site Environmental & Remediation Services (WA) Pty Ltd (SERS) were engaged by Brajkovich Landfill & Recycling (Malaga) Pty Ltd, to prepare an Asbestos Management Plan (AMP) for acceptance and processing of material at a proposed Solid Waste Depot located at 501 Alexander Drive, Mirrabooka WA 6061 (hereby known as 'the Site').

It is proposed within this licence amendment application that the Site be utilised as a Solid Waste Depot ancillary to the existing landfill licence (L6764/1997/14). Operations are proposed to be in-line with the following definitions:

#### Solid Waste Depot

Premises on which waste is stored, or sorted, pending final disposal or re-use

#### 1.1 C&D Waste

Construction and Demolition (C&D) material can be defined within the *Landfill Waste Classification and Waste Definitions* (Dec 2019) DWER as;

Building and demolition waste (e.g. bricks, concrete and associated unavoidable small quantities of paper, plastics, glass, metal and timber that should be recovered), being material resulting from the demolition, erection, construction, refurbishment or alteration of building or from the construction, repair or alteration of infrastructure-type development such as roads, bridges, dams, tunnels, railways and airports, and which is not mixed with any other type of waste (specifically green and food waste), and does not contain any asbestos or PFAS.

The proposed onsite operations will sort through C&D materials for stockpiling, removal offsite for further recycling, and disposal purposes.

The clean, inert, demolition waste materials are to be recovered as recyclable building products such as road bases and aggregates. Material that cannot be recovered from the demolition activities will be removed from the site and disposed of at an appropriately licenced facility.

#### 1.1.1 Asbestos Containing Material

Asbestos has been used historically as an integral component of many structures in Western Australia due to its fire-proof properties. It exists in structures across a wide-ranging area in both friable and bound forms and is particularly commonly encountered as ceiling and wall panels, fascia's, eaves, verandas soffits, fencing, roof sheeting, kitchen tilux, vinyl floor tiles (DHW, 2008), as well as drainage and flue pipes, roofing shingles and flexible building boards (Villaboard, Hardiflex, Wundaboard, Flexiboard).



A more comprehensive list of forms in which asbestos is found is provided at <a href="http://asbestopsawareness.com.au">http://asbestopsawareness.com.au</a>

Construction and demolition waste often have the potential to include Asbestos-Containing Material (ACM). ACM is not always found in the more obvious forms listed above and can have been historically covered over with an impermeable layer such as concrete or can be hidden in interior walls that may be inaccessible during hazardous materials inspections conducted prior to demolition.

As a result, it is imperative that a system exists to ensure that any demolition materials onsite do not contain asbestos and if in the event, ACM are found onsite, it is mandatory to store it as a non-conforming material until it is sent out of the site for disposal at suitable landfill facility.

#### 1.2 Objectives

Asbestos management methods are proposed with the objective of minimising the risk of harm to human and environmental health through preventing the exposure to airborne fibres. Operational methodologies thus ensure material is heavily scrutinised at every step of processing. The AMP additionally intends to minimise the potential risk of asbestos contamination within the site boundary.



## 2 Applicable regulations

#### 2.1 Health (Asbestos) Regulations 1992

The Asbestos Regulations govern the following areas of the Health Act: asbestos cement product; material containing asbestos; and disposal of material containing asbestos.

#### 2.2 Code of practice for the management and control of asbestos in workplace (WHSC 2022)

Developed to assist in the control of the risks of ACM in workplaces by setting out steps to be taken to eliminate or otherwise minimise the risks of exposure to airborne fibres including identification of ACM, risk assessments and the implementation of control measures with the aim of reducing incidences of mesothelioma, asbestosis, and lung cancer.

#### 2.3 Code of Practice for the safe removal of asbestos (WHSC 2022)

Advice is provided for the safe removal of asbestos and ACM from buildings and structures, equipment, machinery, and other vehicles.

## 2.4 Guidelines for the Assessment, Remediation and Management of Asbestos-contaminated Sites in Western Australia (DoH 2021)

Provides guidance on sites where Asbestos contamination in soil (ASBINS) exists and outlines regulatory requirements for assessing, sampling and classifying soil wastes.

# 2.5 Guidelines for managing asbestos at construction and demolition waste recycling facilities (DWER April 2021)

These guidelines provide a framework for C&D waste recycling facilities to work within in relation to the asbestos. The expectations of the former Department of Water Environment and Regulation are laid out in relation to waste acceptance, testing and monitoring and management procedures and practices at the site. The document does not provide guidance on occupational health and safety issues associated with C&D waste recycling facilities.



## 3 Site Characteristics

#### 3.1 Site Identification

The Site consists of current Lot 821 (501) Alexander Drive, Mirrabooka WA 6061. The proposed operations will take place on Lot 821. The title details are provided within **Table 1** below. The Certificates of Title is provided as **Attachment C**.

#### Table 3.1-Subject Site Identification Details

Lot No.	Plan No.	Street No.	Street Name	Suburb	Certificate of Title (Volume/Folio)
Lot 802	424564	501	Alexander Drive	Mirrabooka	4040/768

#### 3.2 Site Location

The site is located approximately 12 km north of the Perth CBD and is bounded by industrial/commercial receptors to the east and west and residential receptors to the north and south. The closest commercial receptor is located on east of the site. Vehicle Access to the site is gained off Truganina Road.

#### 3.3 Site History and Description

Originally the Site consisted of remnant vegetation dating back to 1942. Sand quarrying commenced at the site in the late 1950s. Landfill activities have been carried out at the site since 1977, and previously both putrescible and inert wastes were accepted for burial. In 1997, the Premises was reclassified from a putrescible landfill to a Class I inert Landfill facility only, due to the risk to groundwater from putrescibles being buried I unlined cells. The Premises continues to accept putrescible wastes for sorting only.

The Premises was classified under the CS Act as 'Possibly Contaminated- Investigation Required' in 2009. Following the site classified as a possibly contaminated site, groundwater investigation conducted as a result of the investigation notice received in October 2011, the groundwater investigation identified that the risk from identified compound were low and further work was not required to quantify the risk to ecological and human receptors.



#### 3.4 Buffer distances

The site is located within the area zoned as Industrial and Park & recreation (Reserve) according to Metropolitan Regional Scheme, however the surrounding area to the north and south of site has been zoned as Residential/Urban. The nearest sensitive receptor is an industrial receptor located adjacent to eastern boundary of the site. There are industrial and urban receptors located within 100m and 500m of the site boundary.



## 4 Site Operations

#### 4.1 Description of Proposed Development

Operations will be restricted to areas as outlined within **Figure 2 Site Layout and Key Infrastructure**. Site entry is proposed off Victoria Road. There is currently an accessible driveway suitable for Restricted Access Vehicles (RAV), which will be utilised in Site access and egress. Vehicles will be restricted to sealed areas onsite, to ensure appropriate dust suppression.

Vehicles carrying waste will be directed to the waste sorting area on the central western portion of the site, where waste will be deposited into tipping are (*refer* Figure 2 Site Layout & Infrastructure for details). Loaders and excavators will be utilised in the sorting of waste materials. It is proposed that a mechanical screen (McClosky R155 or equivalent) will be utilised and situated on the southwest corner of the site. Materials will be moved alongside the screen and stockpiled.

Stockpiles will be separated into areas clearly marked for unprocessed waste. Clearly visible and legible signage is to be installed in proximity of the stockpiles.

Middle porting of the site will be utilised as a steel sorting area.

The structure on the central-east portion of the site is intended to be utilised as an administration office and amenity block for site staff.

#### 4.2 Equipment and Machinery

The equipment and machinery that will be utilised onsite as part of the proposed operations include.

- Water Cart
- Excavator x 3
- Wheel Loaders x 2
- Mechanical Screen



#### 4.3 Site Management & Staffing

The day-to-day running of the site shall be overseen by the Site Supervisor. The Site Supervisor is directly responsible for management of all activities at the site, including:

- directing staff duties.
- co-ordinating all demolition materials onsite.
- dust controls.
- noise controls; and
- documentation control.

A site induction for onsite personnel will include detailed familiarisation with this AMP, as well as other associated management plans for noise and dust. Each employee will be provided with a copy of these plans and will be required to agree to work within the methodologies detailed in each document. Records of this process shall be retained on-site.

Further training measures are outlined within section 5.1 of this document.



Table 4.1 - Provides details of the specific role's employee is expected to carry out.

		Personnel					Machinery	
		Gatehouse	Site supervisor	Machine operator	Truck Driver	Site worker	Excavator	Loader
1	Inspection of Load on entry to site and administration functions	0			0			
2	Inspection of the load post tipping		o					
3	Stockpiling of waste at the site- Inspection of material as it is stockpiled			0			0	0
4A	ACM identified (at the gatehouse)- Load rejected at the gatehouse	0			0			
4B	ACM identified (during tipping)- Must be quarantined and removed from the site immediately or as early as possible		o	o		0	0	0
5	Removal of ACM from site and disposal of ACM at appropriately authorised landfill facility		0	0	0	0	0	0
5	Material sorting			0		0		o
7	Stockpiling material			0		o		o
8	Inspection of sorted material		o					



#### 4.4 Water Supply

The water source for the site will be groundwater extraction bore, located on site. This bore will have a licensed capacity of 53880kL per annum which will cover all on site water requirement. Water will be pumped from the bore to a water cart as required. This watering cart will operate on permanent basis during operational hours to dampen haul roads throughout the site. The watering cart will also as a pumper truck and will have a fire hose application fitted which will be utilised for additional dust control and in the unlikely event of a fire.

#### 4.5 Complaints

All off-site complains are taken and treated very seriously. It is the aim to handle all these complain without delay. Contact will be made with the complainant and an investigation will occur into the nature and cause of the complaint and a corrective action solution will be devised to mitigate a future similar occurrence. Individual complaint forms and a complaints register will be compiled by SERS for PCUB incorporating all future known complaints from the site. A template complaint form can be seen in **Appendix A**.

#### 4.6 Possible locations of asbestos on site

The pre-acceptance and acceptance procedures which will be put in place on site are expected to ensure that asbestos and ACM do not enter the site. However, it is possible for asbestos to be present on site. The following locations have the potential to contain asbestos:

- i. The landfill tipping area
- ii. Non-conforming waste area

All members of staff will be trained in the identification of asbestos and will inspect the material at all stages of the recycling process. Should asbestos be identified on site it will be transferred to a quarantine area, pending its final disposal at an appropriately license facility.

#### 4.7 Records for Inspection

Records will be maintained on site for inspection should they be required by the DWER. The on-site records will

include the following:

- For all rejected loads, the following will be recorded.
  - i. Waste producer.
  - ii. Waste carrier.
  - iii. Registration number of the carrier vehicle.



- iv. Date of rejection.
- Complaints received and the management response
- Details of incidents of asbestos identification on site and the actions taken in response to the non-conformance
- Record of the visual inspections
- Details of audits which have been undertaken in relation to the implementation of procedures on site.

All records will be kept in a centralised location within the administration of the proponent. All records will be made available for inspection by the DWER, DoH and WorkSafe upon request.



## 5 Asbestos Management Procedures

The risk of encountering asbestos must be managed throughout the entire processing and stockpiling process onsite.

All asbestos material encountered should be managed in accordance with the following documents:

- Work Health and Safety Act 2020 (Western Australia)
- Work Health and Safety (General) Regulations 2022 (Western Australia)
- Health (Asbestos) Regulations 1992 (Western Australia)
- Guidelines for managing asbestos at construction and demolition waste recycling facilities (DWER April 2021).
- Guidelines for the Assessment, Remediation and Management of Asbestos-contaminated Sites in Western Australia (DoH 2021)
- Code of Practice: How to Manage and Control Asbestos in the Workplace (WHSC, 2022)
- Code of Practice: How to Safely Remove Asbestos (WHSC, 2022)

#### 5.1 Training

All Site-Supervisors and experienced personnel are required to undergo an Asbestos training course which involves training and education on the following:

1. VET course- Remove Non-Friable Asbestos (current unit CPCCDE3014) or equivalent

Records are kept of all employees with the above accreditation or equivalent. Refresher training courses will be provided to employees where appropriate to ensure they have a clear understanding and awareness of the environmental and asbestos related issues.

#### 5.2 Pre-Acceptance Procedures

Loads arriving at the depot for waste sorting and storage may contain asbestos and/or waste outside the waste classification presented in license. The following procedure has been implemented for all material arriving onsite:

- Advice all clients (potential and existing) that any asbestos containing material are not permitted and will not be accepted onto site, and a no asbestos clause will be included in any contract with construction & demolition suppliers.
- ii) A 'No Asbestos' sign will be installed at the site entrance.
- Staff are to record the details of all loads accepted onto site including the producer, carrier, vehicle, registration number, date, and time.



iv) All vehicles will be visually inspected at the weighbridge to determine the risk of a load containing asbestos or ACM. This is in accordance with the risk of a load containing asbestos or ACM. This is in accordance with the risk classification procedure as outlined in the DWER 2021 Guidelines for managing asbestos at construction and demolition waste recycling facilities. This has been attached as Table 5.1 below.

Table 5.1	- DWER Risk	Classification	Matrix
		Cracerioni	

RISK CLASSIFICATION MATRIX						
	Type of Load					
Material Type	Commercial	Public, Ute, Cars and Trailers	Skip Bins			
Clean concrete (without formwork)	Low	High	High			
Clean Brick	Low	High	High			
Clean Bitumen/Asphalt	Low	High	High			
Mixed Construction Waste	High	High	High			
Mixed Demolition Waste	High	High	High			

 v) Loads containing visibly identifiable ACM will be rejected from site and recorded in a registry to be always kept on site. Details to be recorded include the waste producer, carrier, registration number, time, date, and reason for rejection. This register will be made available for inspection upon requested.

#### 5.3 Post- Acceptance Inspection

Loads accepted onto site will be directed to a sorting area where non-conforming materials are segregated from the loads and placed in a separate non-conforming waste pile to be removed from the site. Following this, the remaining waste will be tipped and visually inspected by a trained staff member to identify any remaining ACM before allowing the material to be further sorted. All loads will be wet down before any load or unloading of material to minimise airborne dust. Hand pickers are to monitor any asbestos containing material during sorting process.



#### 5.4 Containment of identified ACM

In instances where ACM is identified, work will be ceased immediately until the material is removed and the area is deemed free of ACM. Where possible, ACM will be removed from the affected area by manual hand picking by a qualified staff member wearing appropriate PPE. All ACM will be wetted down to avoid loose fibres becoming airborne. Following this, it will be immediately bagged in a heavy duty, impermeable, 200µm polyethylene bag, which will then be sealed and clearly marked with 'CAUTION ASBESTOS'. The area will then be inspected by a competent site supervisor. If any further ACM is identified, the above procedure will be repeated until the area is declared free of any ACM. In instances where the material is fibrous, friable, or asbestos fines, the area will remain cordoned off until a qualified environmental consultant has inspected the area and advised an appropriate course of action.

If manual picking is deemed unsafe due to large levels of contamination or other concerns, the affected area will be treated as asbestos-contaminated and barricaded off with adequate signage and barriers. The area will be sprayed with water and mechanically loaded directly onto a semi-tipper for immediate transport to a licensed ACM receival facility.

Loading and transport will be in accordance with the Code of Practice: How to Safely Remove Asbestos (WHSC, 2022). Once the material has been removed, the area will then be inspected, and the process repeated until the area is deemed ACM free. All employees involved in this process will be suitably qualified and utilising all appropriate PPE and RPE.

#### 5.5 Storage and Removal of ACM

All ACM identified will be removed from site as soon as practicably in accordance with the Code of Practice: How to Safely Remove Asbestos (WHSC, 2022). This will involve disposal of the ACM at a suitable licensed landfill facility as per the health (Asbestos) Regulations 1992. The nearest landfill site licensed to accept ACM in the area include:

Walyunga Landfill
91 Walyunga Road (Lot 5 on Plan 7892)
Bullsbrook WA 6084

In instances where it cannot be removed immediately, it will be stored in a dedicated ACM skip bin, lined with heavy duty plastic sheeting, and kept damp until a time it can be safely removed from the site.



#### 5.6 Decontamination

Once all the ACM has been removed, employees shall instigate the following procedure:

- i) All visible asbestos dust/residue is removed from the disposable protective clothing by wet wiping all clothing.
- ii) The disposable protective clothing is taken off (while still wearing a respirator) and placed in an asbestos bag.
- iii) Clothing and footwear worn during the removal shall be vacuumed using an asbestos vacuum cleaner and then the footwear shall be wet wiped
- iv) Disposable respirators shall then be discarded as asbestos waste.
- v) Workers shall wash their face and hands, paying particular attention to their fingernails.
- vi) All bagged PPE and RPE materials shall be disposed of as asbestos waste.



## 6 Sampling and Monitoring

No Sampling and monitoring have been proposed at this time as any loads containing asbestos or ACM will be rejected at the gatehouse upon identification. Any ACM or asbestos contaminated material identified post-acceptance will be quarantined upon identification and removed from the facility immediately or as early as practicable.

As there is no proposal to process C&D waste into as recyclable product at the facility (crushing and screening), the sampling and analysis provisions as prescribed within the Guidelines for managing asbestos at construction and demolition waste recycling facilities (DWER April 2021) are not required.



## 7 General Management

#### 7.1 Audits

Auditing shall be undertaken on a regular basis to endure the correct implementation and effectiveness of the proposed management measures.

The audits carried out on site will include the following inspections and observations.

- A visual inspection of the site.
- Checking of all relevant documentation on the first visit and then on a random/ judgemental basis subsequently.
- Observation on a random/judgemental basis of procedures associated with the identification and management of any asbestos material.
- Put forward any actions which should be implemented to resolve any deficiencies on site practices or if any asbestos is identified as part of the audit process.

#### 7.2 Review of Asbestos Management Plan

The methods set out in the AMP ate the most up to date at this time. Should management practices, technologies guidelines or operating procedures change, this AMP will be revised to reflect the alternate practices. Before any changes are put into practice on site, approval will be sought from DWER and DoH.

Irrespective of legislative and process changes, this AMP will be periodically reviewed every 24 months.



## References

Work Health and Safety Act (WA, 2020)

Work Health and Safety (General) Regulations 2022 (Western Australia)

Code of Practice: How to Safety Remove Asbestos (WHSC, 2022)

Code of Practice: How to Manage and Control Asbestos in the Workplace (WHSC, 2022)

Department of Health, *Guidelines for the Assessment, Remediation and Management of Asbestoscontaminated Sites in Western Australia April 2021,* Government of Western Australia, Perth, WA.

Department of Water and Environmental Regulation. (2021). Managing Asbestos at Construction and Demolition Waste Recycling Facilities.

National Occupational Health and Safety Commission, 2005. *Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd ed.* NOHSC:3003(2005) Figures





Figure 1. Ger	neral Site Loca	ation	27	
PROJECT Lot 821 (501) ALexander Driv	ve, Mirrabooka	a WA 6061	PROJECT CODE 004-28	A COMPANY
DESIGN/DRAW Checked By MC	VERSION 02	DATE 1	8/04/2024	
	Source Nea	arMaps		Perts Construction
PREPARED FOR	Scale 0	5 10 km		
Brajkovich Landfill and Recycling Pty Ltd	-			annan 9 mar Ol



	Figure 2. Site Layout and Infrastructure						
Project Code: 004-28	Project : Lot 821 and Southwest part of Lot 820 (501) Alexander Drive, Mirrabooka WA Date: 12 October 2023	Approved BY: MC	Design/Drawn By: BK				
Client: Brajkovich Landfill & Recycling (Malaga) Pty Ltd	Legends: Entry Watertank Site boundary Tipping Area Administration Non-conforming waste Screening Area Weighbridge C&D waste Cell 1 Greenwaste	Scale: 0 100	200 m				



# Appendix A. Source-site Asbestos Inspection Checklist

ASBESTOS IN	SPECTIC	N & CLEA	ARANCE CERTIFI	CATE	
SITE ADDRESS:					
SITE DESCRIPTION:					
AC REMOVAL SUPERVISO	R (NAME):			DATE	REMOVED:
LOCATION OF AC	AC PRESENT Y/N	AC REMOVED Y/N/NA	COMMENT	s	CLEARE
WALLS EXTERIOR					
WALLS INTERIOR					
EAVES					
VINYL FLOORING					
ELECTRIC. BOARDS					
SHEDS/OUTBUILDINGS					
FENCES	_				
OTHER					
ALL ASBESTOS REMOVAL	Y/N:	Y/N:			
DISPOSAL LOCATION:	DOC	DOCKET # :			
SAMPLE AC RESULTS (if a	pplicable)- DE	TAILS or RESULT	#:	.**	
CLEARANCE BY:	CLEARANCE D	ARANCE DATE:			
CLEARANCE BY:	CLEARANCE D	EARANCE DATE:			



## Appendix B. Risk Matrix for Asbestos in Rubble

Revision N	Number:							
	Date:							
5	ite details	i			0		-	
Acci	essed by:				Signed by:		<u>.</u>	
	3							
Asbestos in Rubble/Stockpile Risk Matrix			5	4	3	2	1	
		People	Very limited exposure	Confined exposure	Short term exposure	Long term exposure	Indefinate exposure	
		Environment	Short term impact to small area	Short term impact to large area	Long term impact to small area	Long term impact to large area	Permanent consequence	
		Community	Concern	Immediate workers	Site specific	Multiple sites	Whole of process	
Determine the extent	Α	Extent of AC not ascertainable	High	High	Extreme	Extreme	Extreme	
	В	AC part visable in larger area	Moderate	High	High	Extremé	Extreme	
	С	AC part visable in confined area	Low	Moderate	High	Extreme	Extreme	
	D	AC all visable in larger area	Low	Low	Moderate	High	Extreme	
	E	AC all visable in confined area	Low	Løw	Moderate	High	High	
tep 1:	Determ	ine the severity of the conseque		Step 4: Develop con	trol measures using	heirachy of controls		
tep 2:	Determ	ine the likelyhood that the hazar	incident	Step 5: Determine th				
tep 3:	Analyse	e the true risk (Extreme, High, M	oderate, Low)					
ow to mod	erate risk	will facilitate hand picking of affe	ected area.					
oderate to	High risk	will facilitate localised loading or	ut of material to	AC landfill facility.				
igh to Extr	eme risk	will facilitate bulk removal to an a	approved AC lan	dfill facility.				