



Northern Territory Waste Transporters Licence

Asbestos Waste Transport Management and Emergency Response Plan

Prepared By	Position	Document Owner	Position
Steve Nassif	Senior Project Engineer	Liberty Industrial	Principal Contractor
Jenny Gough	Environmental Manager	Liberty Industrial	Principal Contractor

Authorised By	Position	Signature	Date
Anthony Milanich	Project Director		26/10/2022

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Contents

1	Overview	3
1.1	Introduction.....	3
1.2	Purpose	3
1.3	Scope	3
1.4	Roles and Responsibilities.....	4
2	Waste Transport.....	4
2.1	Vehicle Loading & Transport	4
2.2	Reporting, Record Keeping and Measuring of Waste.....	5
2.3	Complaints Handling.....	6
3	Management And Planning	6
3.1	Licensing	6
4	Emergencies	6
	Appendix A – Hierarchy of Management Plans	8
	Appendix B – Relevant Legislation and Standards	8
	B.1 Legislation Requirements	8
	B.2 Standards	8
	Appendix C - Reference Documents	9
	Appendix D - Abbreviations And Definitions	10
	Appendix E - Terminology.....	10

1 OVERVIEW

1.1 INTRODUCTION

Liberty Industrial (Liberty) is committed to understanding and controlling any safety or environmental hazards and preventing any adverse impacts from our work, including collection, transport, and delivery for disposal of asbestos waste and soil containing asbestos.

Liberty provides a safe working environment for all employees and contractors, and strives to protect all aspects of human health and the environment, while providing top quality service to our clients. Our Management System encompasses all aspects of the business, including environmental management plans and specific operating procedures where required.

As part of the overall Management System, this Asbestos Waste Transport Management Plan (AWTMP) is made expressly for transporting specific listed wastes (asbestos waste, and soils containing asbestos) generated from the Rio Tinto Gove Refinery Decontamination, Demolition, and Disposal Project (DDD Project), and addresses how Liberty will manage environmental aspects to ensure that there is no impact to the community or the environment resulting from the transport of these wastes.

1.2 PURPOSE

This Asbestos Waste Transport Management Plan defines the strategy for the uplift, transport and disposal of asbestos from the DDD Project to appropriately licensed landfills (the designated Landfill) within the Northern Territory, including the Nhulunbuy Corporation Limited Landfill, located on Melville Bay Road in Nhulunbuy, Shoal Bay Landfill, located in Darwin, and/or Katherine Landfill, located in Katherine.

Liberty Industrial is currently permitted for up to 500 tonne asbestos disposal with Shoal Bay Landfill in Darwin. Other landfills may require an asbestos disposal application to be submitted and approved, prior to shipping any asbestos waste to those landfills.

The purpose of this plan is to ensure that these activities are undertaken in accordance with the requirements of the Northern Territory Environment Protection Agency, applicable waste management legislation, and Liberty's Environmental Management Plan.

Specifically, it helps Liberty to ensure that appropriate management practices are identified and implemented, such that risks are adequately managed.

1.3 SCOPE

The AWTMP is prepared for transporting appropriately packaged asbestos waste from the generating site (the Refinery) to the designated Landfills only, and will be in effect throughout the execution phase for the DDD Project.

The AWTMP details the approach for transporting asbestos waste transport to its final disposal location associated with the DDD Project, in accordance with NT legislation and in compliance with both Rio Tinto and Liberty Industrial policies, procedures and specifications.

The AWTMP is a sub-plan of *252-HSE-PLN-000-010 Asbestos Removal Control Plan*. It has been developed in conjunction with other plans to ensure that all workers involved with the asbestos removal, transport and disposal of asbestos waste have the formal training, supervision and instruction, along with the understanding of the specific risks associated with handling and removal of Asbestos Containing Material (ACM), in order to safely undertake the works. The hierarchy of management plans developed for the DDD Project is shown in Appendix A.

NOTE 1: The scope only includes asbestos waste and soil containing asbestos, and does not include any other listed wastes. No other listed wastes will be accepted for transport by the Liberty Industrial transport vehicle.

NOTE 2: No asbestos waste or soil containing asbestos (or other listed wastes) will be transported outside of the Northern Territory.

1.4 ROLES AND RESPONSIBILITIES

All of Liberty's employees and contractors are responsible for upholding Liberty's environmental performance and commitment to comply with all relevant legislation, policies and guidelines. This extends to the management and control of environmental risks associated with transporting asbestos waste and soil containing asbestos, within the Northern Territory. All workers are responsible for ensuring that works are conducted in a manner that is safe and without risk to themselves, other workers, the community, and the environment.

The Liberty Industrial Environmental Manager is responsible to ensure that this Plan is updated as required, and communicated to all Site Supervisors, and understood by employees and contractors involved in completing the required tasks for transport of the relevant listed wastes.

The site Asbestos Supervisor is responsible for all aspects of the asbestos removal related to the DDD project, including implementing Liberty Management Plans, and observing all WHS legislation. The Asbestos Supervisor provides advice and assistance to all workers and contractors with respect to asbestos handling, including transport and disposal.

2 WASTE TRANSPORT

2.1 VEHICLE LOADING & TRANSPORT

2.1.1 ASBESTOS WASTE HANDLING

Asbestos waste (including soil containing asbestos) will be appropriately packaged and prepared for transport to prevent the generation of fibres during transport and disposal activities (i.e., wrapped and sealed in heavy duty 200 µm thickness polyethylene, double-bagged, goose-necked and appropriately tagged and labelled for disposal denoting that the waste contains asbestos), as described in *252-HSE-PLN-000-010 Asbestos Removal Control Plan*.

Additional site conditions relating to temporary holding of asbestos containing materials (ACM) prior to off-site disposal are captured in the *252-HSE-PLN-000-009 Caustic and Hazardous Substances Management Plan*.

A look-ahead schedule will be used to forecast departure dates for the transport and off-site disposal of asbestos waste.

Prior to loading the vehicle with asbestos waste (including soil containing asbestos), the Asbestos Supervisor will arrange for each load containing asbestos waste and soil containing asbestos to be scheduled for delivery and immediate disposal at the designated Landfill.

Should immediate disposal not be an option, the Asbestos Supervisor will ensure that all asbestos wastes are segregated at the receiving site until they are appropriately placed for final disposal.

NO VEHICLE LOADING MAY OCCUR until the designated Landfill schedules a date and time to accept the waste load for disposal into an appropriate cell within the Landfill.

Note that asbestos waste and soil containing asbestos residual may not be stored in the vehicle at any location outside of the Refinery.

The Asbestos Supervisor is responsible for notifying the Environmental Manager to create a Waste Tracking Manifest for each load of asbestos moving within the NT (further details in Section 2.2 – Reporting, Record Keeping and Measurement of Waste).

2.1.2 TRANSPORT TO DESIGNATED LANDFILLS

The vehicle used to transport asbestos waste and soil containing asbestos residual is an Isuzu FZY Skip/Hook Bin, registered in New South Wales, plated XN1601, with a 13-tonne carrying capacity. Additional vehicles may be added at a later date, with appropriate submission provided to the NT EPA.

No other listed wastes will be transported with this vehicle.

Liberty Industrial ensures that all plant and equipment used in the collection and transport of asbestos waste, including the nominated vehicle described above, is maintained such that it is reasonably fit for the purpose and use as described, is operated by a person trained to operate it, and is operated by a person (or accompanied by a person) who is trained to handle, transport and dispose of asbestos waste or soil containing asbestos residue.

All Liberty employees and contractors conduct themselves according to the WHS legislation and the Motor Vehicle Act. Liberty has in place a Verification of Competency (VOC) process for operating vehicles. Any employee or contractor operating the waste transport vehicle is appropriately trained, and competency verified, prior to operating the vehicle.

Information relating to the vehicle is submitted on the online NT EPA Register, and should any changes be made to the vehicle, this information will be updated forthwith.

The vehicle will carry a copy of the license to transport listed waste, as well as legible manifests of the load being carried. The vehicle is equipped with appropriate spill response equipment and personal protective equipment, in order to provide response capabilities in the event of an unplanned release to the environment.

Each load will be weighed for appropriate tracking of waste movements, as outlined in Section 2.2.

2.2 REPORTING, RECORD KEEPING AND MEASURING OF WASTE

Records will be kept of all movements of asbestos waste and soil containing asbestos residual from the Refinery to the designated Landfill.

As there is currently no requirement for waste tracking within the Northern Territory, all asbestos waste (controlled/listed waste) will be recorded on shipping manifests prepared for each individual load.

The Liberty Industrial Environmental Manager (or delegate) is responsible for generating waste manifests. The Asbestos Supervisor is responsible for providing the required information (dates of upcoming shipments, weight of each shipment) to the Environmental Manager, and must await confirmation that the appropriate manifest has been prepared, PRIOR TO allowing the waste shipment to be loaded.

2.3 COMPLAINTS HANDLING

An Asbestos Waste Transport Complaints Log (Appendix F) outlines the process for managing complaints received from the community in relation to the transport of asbestos waste, and includes the following information;

- Date and time of complaint
- Date and time relating to the event which caused the complaint
- Nature of the complaint
- Person receiving the complaint
- Name and contact details of person making the complaint (or denote if complaint is anonymous)
- Person assigned to investigate complaint
- Prevailing weather conditions at the time of the event
- Actions taken to resolve complaint, including follow-up communication with complainant (or if no action taken, a rationale for no action required)

The Liberty Industrial Environmental Manager is responsible for ensuring the Complaints Log is maintained up-to-date and that any actions are followed through. All Liberty employees and contractors who receive a complaint, are responsible for ensuring that their Supervisor and/or the Environmental Manager are informed of the complaint.

3 MANAGEMENT AND PLANNING

3.1 LICENCING

Liberty Industrial has applied for an Environmental Protection License (EPL) to transport this listed waste within the Northern Territory only (Transporter).

All licenses and related documentation are maintained by the Environmental Manager.

4 EMERGENCIES

All on-site and off-site emergencies related to the DDD Project are addressed by the overarching guidance document *252-HSE-PLN-000-005 Emergency Response Management Plan*.

This section provides specific information to address any emergency that may occur during transport of listed waste. Emergencies involving transport of listed waste may include;

- vehicle accident;
- release of fibres from improperly packaged materials;
- exposure of community members;
- partial or complete loss of waste load.

The Asbestos Supervisor, transport vehicle drivers, and all involved workers must familiarise themselves with the appropriate spill response equipment and personal protective equipment, in order to respond in the event of an unplanned release to the environment.

IN ALL SITUATIONS the following must be observed;

- NEVER put property or equipment above a person's safety;
- NEVER take action that may cause risk to yourself or others;
- ALWAYS call 000 or 112 from mobile, to request assistance, even if the situation appears to be easily handled

- ALWAYS be aware of current location;
- ALWAYS report incidents, accidents and injuries so that proper investigation can be conducted.

Emergency release spill measures required to be on-board the transport vehicle include;

- Two (2) full sets of asbestos PPE, including disposable coveralls rated Type 5 & 6, Category 3 (ISO 13982-1) (or equivalent), gloves, booties, and monogoggles
- Driver's and accompanying workers' personal fitted respirators
- Roll of 200 µm heavy-duty polyethylene plastic

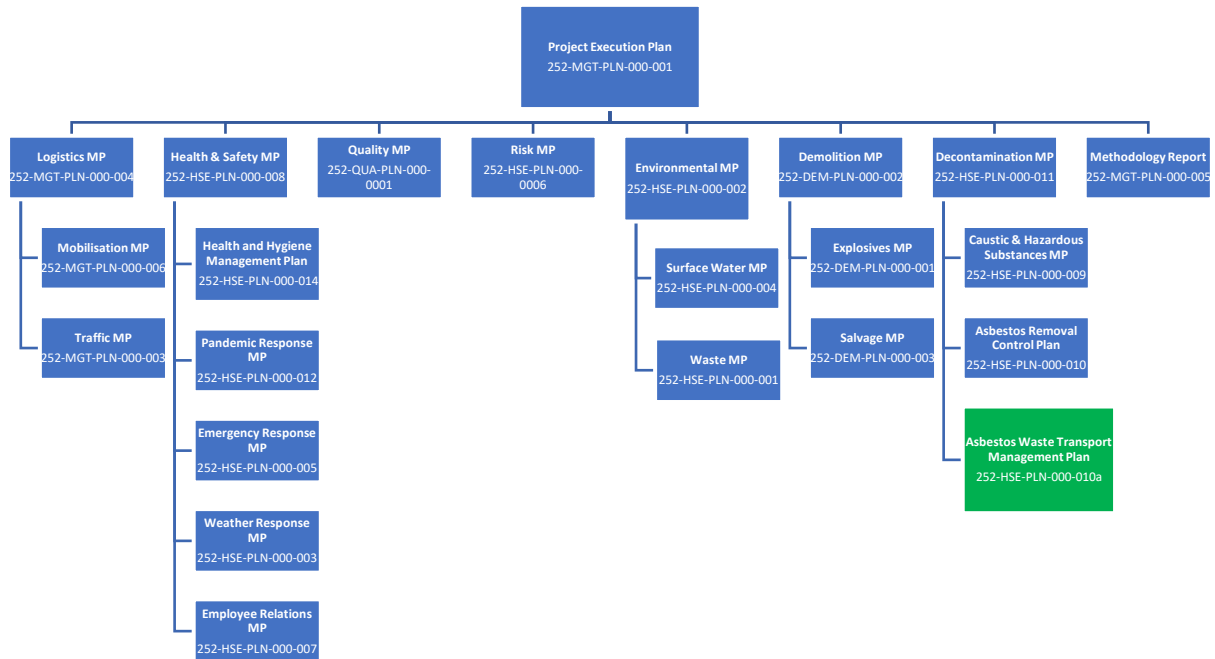
In the event of an accident off-site, the driver or workers must call the Asbestos Supervisor immediately, and 000 (Emergency), to notify of the nature of the emergency.

ONLY IF SAFE TO DO SO, the driver and workers, wearing appropriate personal protective equipment, are to cover the released material as much as possible with heavy-duty polyethylene plastic, to prevent further releases of asbestos waste, and to capture the material can be safely and effectively recovered.

Additional emergency procedures are provided in *252-HSE-PLN-000-005 Emergency Response Management Plan*.

The potential impact of extreme weather events, including cyclones, will be taken into consideration during the planning of works requiring transport of asbestos waste or soil containing asbestos to the designated Landfill. No transport will proceed when a cyclone is anticipated.

APPENDIX A – HIERARCHY OF MANAGEMENT PLANS



APPENDIX B – RELEVANT LEGISLATION AND STANDARDS

B.1 LEGISLATION REQUIREMENTS

Works for the DDD Project are undertaken pursuant to the following legislation:

- Asbestos Disposal in the Northern Territory NT EPA;
- Code of Practice for the Safe Removal of Asbestos (NOHSC:2002) (Cth);
- Guidelines To Prevent Pollution from Building Sites 2015;
- Northern Territory Environmental Protection Act 2019;
- NT WorkSafe Australia. 2020 Demolition Work: Code of Practice;
- NT WorkSafe Australia 2020 How to safely remove asbestos: Code of Practice;
- NT WorkSafe Australia 2020 How to manage and control asbestos in the workplace: Code of Practice;
- The Work Health and Safety (National Uniform Legislation) Act 2011;
- Work Health and Safety (National Uniform Legislation) Act 2011;
- WorkSafe NT Demolition Licensing;
- WorkSafe NT Friable Asbestos Licensing;

B.2 STANDARDS

- AS 1319: Safety Signs for the Occupational Environment;
- AS1715 -2009: Selection, use and maintenance of respiratory protective equipment;
- AS1716-2012: Respiratory protective devise;
- AS 1885.1 – 1990: Workplace injury and disease recording standard;
- AS ISO 14004 – 2018: Environmental management systems – General guidelines on principles, systems and support techniques;
- AS/NZS ISO 14001:2016: Environmental management systems – Requirements with guidance for use;
- AS/NZS ISO 19011:2019 Guidelines for Auditing Management Systems;

- AS/NZS 4801 – 2001: Occupational Health and Safety Management Systems – Specification with Guidance for use;
- AS/NZS ISO 9001:2016: Quality Systems – Model for quality assurance in production, installation and servicing;
- AS/NZS 4804 – 2001: Occupational Health and Safety Management Systems – General guidelines on principles, systems and supporting techniques; and
- Protective clothing for use against solid particulates (ISO 13982–1:2004).

APPENDIX C - REFERENCE DOCUMENTS

Liberty Document Number	Rio Tinto Document Number	Document Title
252-HSE-PLN-000-001	G-Z2264007-CM-PLN-40003	Waste Management Plan
252-HSE-PLN-000-005	G-Z2264007-HE-PLN-40016	Emergency Response Management Plan
252-HSE-PLN-000-008	G-Z2264007-HE-PLN-40017	Health & Safety Management Plan
252-HSE-PLN-000-009	G-Z2264007-HE-PLN-40018	Caustic And Hazardous Substances Management Plan (CHSMP)
252-HSE-PLN-000-010	G-Z2264007-CM-PLN-40004	Asbestos Removal Control Plan
252-HSE-PLN-000-011	G-Z2264007-CM-PLN-40005	Decontamination Management Plan
252-HSE-PLN-000-014	G-Z2264007-HE-PLN-40022	Health and Hygiene Management Plan
252-HSE-REG-000-001	G-Z2264007-HE-REG-40002	Hazardous Material Register
252-ASB-REG-000-001	G-Z2264007-HE-REG-40003	Asbestos Register
252-MGT-PLN-000-006	G-Z2264007-PM-PLN-40003	Mobilisation Management Plan
252-HSE-REG-000-008	n/a	Gove Training Needs Analysis Matrix
N/A	56125/121959	Hazardous Materials Survey, prepared by JBS&G, (Rev0) dated 11 June 2019
N/A	60565619-PL-1000-PR-0001	Hazardous Substances Management Plan, Gove Closure Phase 1 Refinery Remediation, prepared by Veolia Australia and New Zealand & AECOM Australia, dated 23 October 2018
N/A	G-N0000848-CM-SKT- 20002	Operations and Demolition Area Battery Limits and Plant Areas North Plot Plan
N/A	G-N0000848-CM-SKT- 20003	Operations and Demolition Area Battery Limits and Plant Areas South Plot Plan
N/A	GPM-EHS-038	Management of Materials Containing Asbestos
N/A	GPM-EHS-061	Personal Protective Equipment Requirements
N/A	H350030-1000-230-0011	Hazardous Substances Management Plan, prepared by Hatch, dated 02 June 2016
N/A	H362271-1000-240-0001	Hazardous Material Register, prepared by Hatch, dated 08 July 2021

APPENDIX D - ABBREVIATIONS AND DEFINITIONS

Abbreviation	Definition
ACD	Asbestos-Contaminated Dust or Debris
ACM	Asbestos Containing Material
ARCP	Asbestos Removal Control Plan
AS	Australian Standard
CA	Consignment Authority
DDD Project	Decontamination, Demolition and Disposal Works as per the Contract
HAZMAT	Hazardous Materials
HSE	Health, Safety, Environment
HSEQ	Health, Safety, Environment and Quality
NT	Northern Territory
QA	Quality Assurance
RPE	Respiratory Protective Equipment
SFAIRP	So far as is Reasonably Practicable
WHS	Work Health and Safety
WP	Work Plan
WTC	Waste Transfer Certificate

APPENDIX E - TERMINOLOGY

Term	Meaning or Definition
Airborne Asbestos	Means any fibres of asbestos small enough to become airborne. For the purposes of monitoring airborne asbestos fibres, only respirable asbestos fibres counted.
Asbestos	Means the asbestos form varieties of mineral silicates belonging to the serpentine or amphibole groups of rock forming minerals, including Actinolite asbestos, Grunerite (or amosite) asbestos (brown), Anthophyllite asbestos, Chrysotile asbestos (white), Crocidolite asbestos (blue) and Tremolite asbestos or a mixture of any of these
Asbestos Containing Material (ACM)	Means any material or thing that, as part of its design, contains asbestos
Asbestos Removal Work	Work involving the removal of asbestos or ACM; Class A asbestos removal work or Class B asbestos removal work as outlined in Part 8.10 of the WHS Regulation.
Asbestos-Contaminated Dust or Debris (ACD)	Means dust or debris that has settled within a workplace and is (or is assumed to be) contaminated with asbestos
Asbestos Related Work	Means work involving asbestos (other than asbestos removal work to which Part 8.7 of the WHS Regulation applies) that is permitted under the exceptions set out in regulation 419(3), (4) and (5)
Competent Person	A person who has acquired through training, qualification or experience, the knowledge and skills to carry out the task.

Term	Meaning or Definition
Consignment Authority	Authorisation to move Controlled Waste to a receiving facility
Demolition Site	<p>The area within an area, which has been designated and defined by a boundary, within which the practice of demolition will occur.</p> <p>The Demolition Site, also referred to as the Major Refinery Demolition Area in the Contract, that is to handed over to Liberty Industrial,</p>
Hazard	A source or a situation with a potential for harm, in terms of human injury or ill health, damage to property, damage to the environment or a combination of these.
Hazardous Substance	Any substance or material that poses a threat to human health and/or the environment. Typically, hazardous materials are toxic, corrosive, inflammable, explosive or radioactive.
Hazardous Substances Management Plan	A plan provided by the property owner, the owner's agent, or the person on whose behalf the demolition work is done, which identifies all hazardous substances that may affect the health of site personnel or members of the public.
Incident	Any unplanned event resulting in, or having a potential for, injury, ill health, damage, or other loss.
Immediate environment	The properties, including public thoroughfares and spaces, having common boundaries with the demolition site, and where the property is a public thoroughfare, including the properties directly opposite the demolition site.
Operator	A person or organisation operating in one or more of the roles of waste producer, waste transporter or waste receiver
Producer	A person or organisation that is the source of listed waste
Receiver	A licenced facility that is a receiver of listed waste
Refinery	The Gove Refinery, including the administration buildings, workshops and Cargo and Export Wharfs. The Liberty Industrial Demolition Site is located within the Gove Refinery footprint.
Refinery Closure Area	<p>199.3ha of area, including all Refinery infrastructure, as described in the Contract, inclusive of:</p> <ul style="list-style-type: none"> a) The Major Refinery Demolition Area aka the Demolition Site; b) The Post Water Treatment Demolition Area that is to be demolished by Others upon completion of treatment of SNL from the RDA.
Respirable asbestos	<p>Means an asbestos fibre that:</p> <ul style="list-style-type: none"> • Is less than 3-micron metres (µm) wide; • More than 5-micron metres (µm) long; • Has a length to width ratio of more than 3:1.
Transporter	A licenced transporter of listed wasted
Waste Transfer Certificate	The details of each waste movement, issued by NT Online Waste Tracking
Work Plan (WP)	Specifically prepared document that details the methods and procedures for the safe demolition of a structure.