



## ResourceCo RRF Pty Ltd Asbestos Management Plan Wetherill Park RRF

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**Purpose:**

To outline the most effective way to respond to, and recover from, any incident involving Asbestos, or Asbestos containing materials (ACM), at the ResourceCo Resource Recovery Facility Wetherill Park, in accordance with legislative requirements.

**Definition – Asbestos:**

Asbestos is a generic term given to several naturally occurring silicate minerals. The most common forms are Chrysotile (White), Crocidolite (Blue) and Amosite (Brown). Asbestos-Containing-Materials were used extensively in Australian buildings and structures, plant, and equipment, in ships, trains, and motor vehicles during the 1950s, 1960s and 1970s. Some uses, including some friction materials and gaskets, were only discontinued on 31 December 2003.

**Scope:**

This management plan applies to all persons on the ResourceCo Wetherill Park Site, or any parties which may be affected by the operations of the facility in the event of an Asbestos related incident.

**Objectives:**

The objective of this Asbestos / ACM Response plan is to provide information, guidance, and to outline ResourceCo's Responsibilities in relation to:

- Preventative measures undertaken to reduce the risk of as Asbestos related incident occurring on site.
- Identification of and monitoring for, Asbestos and Asbestos Containing Material.
- Control measures in place to mitigate and / or monitor Asbestos related risks in the workplace.
- The way in which Asbestos is handled and detailing the process undertaken to remove any contaminated material on site, relevant to each work area and the different protocols involved for each.
- Decontamination protocols and returning the Facility to an operational state.

**References:**

*Code of Practice: Managing the Risks of Asbestos in the Workplace*  
*Protection of the Environment Operations (Waste) Regulation 2014*  
*EPA NSW: Standards for Managing Construction & Demolition Waste in NSW*

**Types of Asbestos:**

There are two key varieties of Asbestos, as defined by the NSW EPA:

- *Friable (non-bonded) Asbestos material:* Any material that contains asbestos and is in the form of a powder or can be crumbled, pulverized or reduced to powder by hand pressure when dry. All Friable Asbestos must be removed by a licensed Asbestos removalist, there is no amount that can be handled without having a class A Asbestos license.
- *Bonded asbestos material:* Any material (other than friable asbestos material) that contains asbestos. Up to 10m<sup>2</sup> of Bonded Asbestos can be removed with no license, and there are no limitations on Bonded Asbestos removal with a class B license.

**Hazards of Asbestos:**

Whilst undisturbed, Asbestos poses little health risk. It is only when the material becomes disturbed (i.e. moved, broken, crushed etc) that individual Asbestos fibres are released. These fibres once

airborne, can easily be inhaled, and become lodged in the lung tissue, leading to irreversible debilitating illness such as Mesothelioma, Lung Cancer, and Asbestosis.

Asbestos-Containing-Materials are not at all accepted at the facility, ResourceCo Resource Recovery Facility is licensed to accept up to 250 000 tonnes of a combination of: Construction and Demolition waste / residuals, and Commercial and Industrial waste / residuals each year. Although these waste types present the highest risk for Asbestos contamination the facility has strict waste acceptance criteria, and binding customer agreements, stating that ResourceCo is an ACM free site. It is only through a customer breach of these agreements that any ACM related incident may occur.

Given the processes that take place at ResourceCo Resource Recovery Facility, of which almost all involve serious disturbance of materials and large potential for dust generation, it can be understood the immense risk that is posed by the possibility of ACM entering the production process.

**Preventative Measures:**

- Pre-qualification process with potential new customers. Refer to PROC 28 Incoming Waste Customer Pre-Qualification Procedure. As well as thorough inspection of 'trial loads' by management to ensure the waste being brought to site aligns with the information disclosed by the customer.
- Direct education with the customer base to ensure that only materials that are free of Asbestos are delivered, and asbestos will not be accepted.
- Appropriate signage on site that clearly states Asbestos is not accepted at the facility.
- The Weighbridge Operator is trained in Asbestos identification and performs a preliminary inspection of loads by means of an overhead camera at the Weighbridge. Any loads suspected to be contaminated will be turned around at the weighbridge and will not be allowed to progress to the Waste Receiving area.
- The Waste Receiving Inspection Officer will be trained in Asbestos materials identification. All loads containing Construction and Demolition materials are to be tipped away from the Raw Feed Stockpile, spread to a thickness of 200mm, and thoroughly inspected for ACM before being combined with the Raw Feed Stockpile. If any material within a load being delivered is determined to be Asbestos, the entire load will not be accepted on site.

## Control Measures:

In conjunction with the preventative measures in place. There are a number of controls in place for managing the risks of ACM at the ResourceCo Resource Recovery Facility Wetherill Park, these include:

- *MicroPhazir Asbestos identification gun*: This allows near instantaneous determination of whether a material contains Asbestos or not. This takes the 'guesswork' out of the equation for Waste Receiving Inspection Officers, and workers in the factory who may be faced with an Asbestos incident. This allows ACM to be quickly and accurately located, and dealt with appropriately, in line with the processes discussed in this document.
- *Asbestos awareness training*: Waste Inspection Receiving Officers, Weighbridge Operators, Plant Controllers, along with a number of other key permanent personnel, will be Trained in Asbestos awareness, and identification of Asbestos.
- *General-purpose hoses*: Are located around site and can be used to wet down any potentially Asbestos containing material.
- *Asbestos kits*: There are Asbestos kits located at Waste Receiving, and the Control Room. These kits contain dedicated Asbestos disposal bags, Polythene sheeting, Disposable coveralls (type 5, category 3), signage and barricading.
- *Dedicated Asbestos removal bin*: Located inside the Manufacturing facility is a large skip bin dedicated to the removal of possible ACM by an appropriately licensed external contractor. Once appropriately dealt with and sealed, ACM can be stored here with a low likelihood of being disturbed. The bin is collected on an as-needed basis.
- *Personal Protective Equipment*: Task-specific PPE including P2 Respirator, Safety Gloves, Disposable Coveralls, and Site-specific PPE including; Hard Hat, Safety Boots, Safety Glasses, Long sleeve Hi-Visibility Clothing

### **Monitoring for Presence of Asbestos:**

Despite the extensive preventative and control measures in place ResourceCo also conducts regular testing of manufactured products, and background air quality testing, for the presence of Asbestos fibres. This is a part of ResourceCo's commitment to the safety of all persons involved in operations either on / nearby site, through to the end-use, of both inert materials, and fuel products.

- Air monitoring: Background air monitoring is conducted on a quarterly basis across five locations inside the manufacturing facility. These locations are varied for each testing cycle to ensure an accurate representation of airborne Asbestos presence is determined; site wide.
- Testing Fuel: Each month, a composite sample is derived from the mixing of daily fuel samples and sent to an external laboratory for testing. Part of this analysis is comprised of testing for presence of Asbestos.
- Testing Inert Materials: Characterisation testing for all inert Aggregates and Fines is also conducted, at regular intervals, which involves testing for the presence of Asbestos

### **Health Monitoring:**

In addition to monitoring for the presence of Asbestos, regular health monitoring is also conducted for permanent employees of ResourceCo. This testing is conducted in line with POL 27-*Health Monitoring Policy* and contains a Spirometry component, which would identify any deterioration in respiratory function caused by exposure to airborne Asbestos fibres.



## Handling of and Response to Asbestos Incidents:

The way in which Asbestos or ACM are dealt with at ResourceCo, varies depending on the type and location of the material.

In the event that suspected Asbestos, or ACM is discovered the following protocols must be adhered to, for the process of identification of the material:

Step	Action
1	Potential piece of ACM to be tested using the MicroPhazir Asbestos Identification Gun. Following positive identification of ACM, load of material is to be rejected.
2	Production Manager, Shift Supervisor, and Plant Controller are to be notified.
3	Ensure that appropriate PPE is worn (Task specific PPE including P2 Respirator, Safety Gloves, Disposable Coveralls (if friable asbestos identified), and Site-specific PPE including Hard Hat, Safety Boots, Safety Glasses, Long sleeve Hi-Visibility Clothing) when handling the ACM.
4	The area is to be cleared, and the material to be wet down. This is to prevent the potential release of Asbestos fibres.
5	Failing step 1 above, an asbestos awareness trained worker shall identify the material and discern whether the material is Friable, or Bonded.

*Note: If material cannot be defined as being either Bonded asbestos, or generic fibreboard, it is to be assumed as Asbestos containing material and treated appropriately.*

### Friable (non-bonded) Asbestos:

There are no provisions at the ResourceCo Wetherill Park site for dealing with Friable Asbestos in any quantity. In the event that Friable Asbestos is discovered in any capacity:

- All operations are to cease, and the site is to be cleared of all personnel.
- The General Manager, or Production Manager is to contact either; a Class A licensed asbestos removalist, or Hygienist, which will remove all traces of the material and dispose of it at an appropriate facility.
- This applies to customer loads being delivered. In the case that Friable Asbestos is tipped onto the floor it cannot be reloaded by ResourceCo personnel and is subject to the same procedure detailed in above point.

### Bonded Asbestos:

If material is found to be Bonded Asbestos, waste inspection staff are to isolate and treat the material as per the following procedure:

Step	Action
1	Ensure that appropriate PPE is worn (Task specific PPE including P2 Respirator, Safety Gloves, and Site-specific PPE including hard hat, safety boots, safety glasses, long sleeve hi-visibility clothing). The entire load of waste is to be rejected.
2	The area is to be cleared, and the material to be consistently wet-down, to prevent the potential release of Asbestos fibres. Appropriate signage and barricading as found in the onsite Asbestos kits should be used to maintain the aforementioned clear area.
3	Depending on the physical size of the Asbestos or ACM, the material is to be contained in heavy-duty 200 µm (minimum thickness) Asbestos disposal bag or heavy-duty 200 µm (minimum thickness) polythene sheeting. <i>Note: Both polythene sheeting and Asbestos Bags must be double wrapped / bagged.</i>
4	All bags should be twisted shut and sealed with duct tape before being doubled over on itself and being taped again. Polythene sheeting should have tape run along the entire length of all overlaps.
5	All ACM is to be placed in the dedicated Asbestos removal bin, which is located inside the Manufacturing facility for transport to an EPA approved facility.

### Specifics – Weighbridge

- The initial inspection point for all loads is the weighbridge. The weighbridge is fitted with several overhead cameras which allow for inspection of a load from the top down.
- If any ACM is found during the weighbridge inspection, the load is to be rejected and directed to tip at an appropriately licenced facility.
- The details of the load should be recorded in the rejected loads register.

### Specifics - Waste Receival / Waste Stockpile

- In the event that a customer tips a load that is deemed to contain Bonded Asbestos, the entire load will be reloaded onto the truck for disposal at an appropriate facility at the customer's expense. Steps 3 and 4 do not apply in this circumstance.
- If ACM is found in the Waste Stockpile, it is to be removed following the above procedure. A thorough visual inspection of the stockpile must be undertaken by Asbestos awareness trained personnel to ensure all ACM is removed.
- If a load is found to be contaminated, or a portion of the Waste Stockpile is found to be contaminated and cannot be immediately removed. It must be wet down, moved to the designated 'Contaminated Materials Quarantine Area', and barricaded as per CR-SP033 Quarantining of Contaminated Materials until such point as it can be removed from site by the responsible delivering party. Alternatively, ResourceCo will dispose of the material at an appropriate facility and the responsible delivering party will be charged an appropriate fee.

### Specifics – Picking Stations

- If suspected ACM is identified on a conveyor / in a Picking Shed, the Production Stop button should immediately be pressed in order to stop the production line.

- The Plant Controller, or Shift Supervisor should be notified immediately. Either they, or an Asbestos awareness trained person, will assess the situation in accordance with the above procedures, and deal with the situation accordingly.

#### Specifics – Processed Material Stockpile

- If a suspected Asbestos or ACM is identified in a processed materials stockpile (i.e. fines, aggregates etc), the material is to be removed in accordance with the above procedures. However, in the event that the stockpile is contaminated, to the point at which it can no longer be dealt with by ResourceCo personnel, the entire stockpile will have to be removed and transported to an appropriate EPA approved facility for disposal.
- The General Manager, Production Manager, or authorised delegate is to organise transport by an appropriate vehicle in line with EPA legislation.
- The material is to be loaded out using the Material Handler and placed, not dropped, in the designated vehicle. The material should also be consistently wet down during this process. Both of these factors are to aid in minimizing the amount of potentially hazardous dust generated during the process.

#### Personal Decontamination:

After any incident in which personnel have had to deal with Asbestos or ACM it is crucial to the health and safety of the individual, and those around them, that they follow the correct decontamination procedure.

Personal Decontamination should be conducted as follows:

Step	Action
1	Remove any visible asbestos dust/residue from protective clothing wiping down with damp cloths or wet wipes. <i>Warning: do not reuse or re-soak damp cloths.</i>
2	Place cloths / wipes into Asbestos disposal bags.
3	Take disposable coveralls off and place into Asbestos disposal bags (P2 Respiratory Protection must still be worn).
4	Twist bag shut and seal with duct tape, double the end over and seal once again.
5	Place inside another Asbestos disposal bag, and repeat step 4.
6	Remove Respirator, place in Asbestos disposal bag, and repeat steps 4 and 5.

The above process reduces the likelihood of residual Asbestos fibres left on personnel from being proliferated from the worksite through to their offices, vehicles, and homes. In following the procedures outlined in this document in conjunction with utilising correct PPE, Asbestos related incidents should be able to be dealt with in a safe and effective manner.

**Resuming Operations:**

In order for operations to resume, there are a number of protocols which must take place:

- Once all suspected Asbestos or ACM has been adequately contained and removed, an Asbestos awareness trained person must thoroughly inspect the affected area. Only trained personnel are able to declare that the area is safe to return to operations.
- In the event that Friable Asbestos was identified, and subsequently removed, only a qualified Hygienist can determine that the site is safe to re-enter and resume operations.
- Any equipment that may have been isolated or altered during the incident, must be returned to serviceable condition before operations can begin.

**Reporting:**

- An incident report must be submitted in accordance with CR-FM019 – Incident Report.
- Customers who bring Asbestos or ACM on to the ResourceCo Wetherill Park site intentionally, or consistently, may at the discretion of the General Manager:
  - Have their permission to tip revoked.
  - In severe cases may be reported to the EPA