







Calibre
Fibrous Material Management Procedure

CP-PRO-HSEQ-010

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0	Issued for Use	CRP 	RCW 	AXH 	RKM 	March 2011
A	Issued for Internal Review	RCW				Jan 2011
Rev	Description	Author	Checked	Approved	Authorised	Date

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1.0 INTRODUCTION

The Pilbara Region of Western Australia is a naturally dusty environment. Dust levels are increased during construction activities, with any strong winds making the problem worse. Fibrous materials are known to occur in the Pilbara, and can be transported in dust from disturbed areas. High dust levels and the presence of fibres, either separately or in conjunction, can create an uncomfortable and unsafe working environment. Dust and fibre levels need to be monitored and controlled in order to maintain a safe working environment, as well as minimise environmental impacts within the areas of construction projects.

2.0 DUST MANAGEMENT POLICY

All activities will be carried out in a manner that limits airborne dust in the workplace to as low as reasonably practicable.

Various methods and technologies will be employed to try ensure that levels are below legislative limits, and the aim is to keep levels to less than one half the current legislative requirements. For hazardous materials, such as asbestos and silica, dust levels will be kept as low as reasonably achievable.

Identified risks and the results of dust monitoring will be freely and openly communicated to all employees by way of induction, tool box meetings, signage, work instructions, notice boards and other means.

The strategy for managing the risk of exposure to dust has the following essential elements:

- hazard identification;
- risk assessment;
- risk control;
- process and review; and
- auditing, with clear accountabilities assigned.

3.0 FIBROUS MINERALS AND THEIR OCCURRENCE

WA Mines Safety and Inspection Regulation 1995 9.33 defines a fibre as a particle with a width less than 1 micron and length greater than 5 microns. Mineral fibres often occur in large, visible bundles, but individual fibres are only visible under high magnification, as the width is often less than 1/50th of a human hair.

The family of minerals broadly called "asbestos" falls into this category. Asbestos is divided into two groups of minerals - the Serpentine and the Amphiboles. These minerals usually occur in non-fibrous form, but under some geological conditions, they are distinctly fibrous, with aspect ratios of more than 100.

There are several types of asbestos - Chrysotile (white asbestos), Amosite (brown asbestos), Crocidolite (blue asbestos), Anthophyllite, Tremolite and Actinolite. All have the potential to cause disease.

Asbestos minerals are prevalent in many gold, nickel and Iron ore deposits in Western Australia and throughout the world. Commercial exploitation of asbestos occurred

historically in Western Australia in parts of the Hamersley ranges centred around the Wittenoom Gorge and Yampire Gorge areas.

Surveyor General Maps, Mines Dept records and RioTinto Geological Data indicate that there is a high probability of encountering asbestos minerals intermittently during the life of a project. Fibrous minerals can be present in “fresh rock” and in topsoils.

Soils and river gravels derived by erosion of asbestos formations sometimes contain fibrous minerals. Usually, the weathering processes degrades most fibrous minerals to a number of harmless secondary minerals such as talc, chlorite, clay and iron oxides. Previous works conducted have identified fibrous minerals in creek beds many 10's of kilometres away from known deposits.

4.0 HEALTH RISKS OF EXPOSURE TO FIBROUS MINERALS

The pathway for contracting an asbestos disease is by breathing in asbestos dust. The important health considerations are that:

- The diseases are all serious and the emphasis must be on preventing the disease in the first place;
- The onset of these diseases usually occurs tens of years after exposure;
- Although different types of asbestos fibres have varying potencies, all fibrous minerals should be assumed to be equally hazardous and treated the same;
- The risk of an asbestos induced disease is related to the dose inhaled over a period of time;
- Other factors such as smoking have a multiplying effect on the probability of contracting some diseases; and
- These aspects will be dealt with specifically in inductions and ongoing awareness presentations.

5.0 MEDICAL SURVEILLANCE

Medical examinations cannot detect asbestos-related disease at the initial stage of development. Additionally there are no tests that can predict the manifestation of disease in the future. As such no specific medical examination is required for personnel working on this project.

However, all personnel working on the Project may be required to undergo as a condition of employment, a Pre Employment medical examination that meets both the clients requirements and that of Mines Medical Health Surveillance requirements (as per regulations – not required on sites regulated by Worksafe WA). Should symptoms present at this time the examining medical officer may request further testing or examination.

6.0 REGULATIONS/GUIDELINES AND EXPOSURE STANDARDS AND REFERENCES

The Australian Standards for exposure to fibrous minerals and some other hazardous dusts exist however the more stringent requirements of the *RioTinto Health Standards* shall apply to this project and are summarised below:

- 0.1 respirable asbestos fibres per millilitre of air, as determined by the method published by the Australian National Occupational Health and Safety Commission, - Membrane Filter Method of Estimating Airborne Asbestos Dust;
- 10 mg/m³ of Inspirable Dust (5mg/m³ recommended) as determined by AS3640;
- 5mg/m³ of Respirable dust (2.5mg/m³ recommended) as determined by AS2985;
- 0.1mg/m³ of Respirable Silica (0.1mg/m³ recommended) as determined by AS 2985 and NHandMRC Method for the Determination of Respirable Silica by FTIR.

Compliance to these levels will ensure that the risk of disease is negligible.

Other references include:

- Calibre Occupational Health and Hygiene Management Plan for RTIOEP CP-PLN-HSEQ-002.
- RTIO Ironsafe Standard 5.6 Particulate and Gas/Vapour Exposures.

7.0 MONITORING AND ANALYSIS TECHNIQUES

Monitoring will be conducted, of a least the following materials, on site by qualified person under the Health and Hygiene Plan:

- Asbestos;
- Inspirable dust;
- Inspirable Metal dusts;
- Respirable dust;
- Respirable Silica dust.

8.0 ACTION LEVELS

The aim of the client is to ensure that exposure to any contaminant is less than the statutory occupational exposure level at all times. For substances that have acute effects, such as carbon monoxide or ammonia this must be rigidly enforced as the standards are set to prevent immediate discomfort or death. For chronic hazards such as asbestos or silica, this is less critical as long as excursions above the standard are not large and that they are balanced by periods below the standards. The standards have been set after careful evaluation of the effects of cumulative exposure to these substances.

For this reason, a single result slightly above the standard in the absence of other information is rarely justification to implement stringent procedures.

Based on this background and sound occupational hygiene principles a progressive implementation of procedures will be imposed in accordance with the table below.

SUMMARY OF RESULTS	RECOMMENDED ACTION
All results < 50% of recommended standard	No additional action necessary. Maintain baseline air sampling program.
All results less than recommended standard and 5% of results exceed 50% of recommended standard or indicator minerals for asbestos have been identified	Classify as a Potentially Hazardous Area . Investigate workplace/work practices and control measures. Invoke agreed work and management procedures. Implement routine personal monitoring.
5% of samples exceed recommended standard or 5% of samples exceed 50% of recommended standard and indicator minerals for asbestos have been identified or visible asbestos has been identified	Classify as Designated Hazardous Area and take remedial action (improve control measures, provide respiratory protection). Investigate workplace/work practices and control measures. Invoke agreed work and management procedures. Implement routine personal monitoring.

Note: Recommended standards are 0.1 fibres for respirable fibre, 5 mg/m³ for inspirable dust, 2.5 mg/m³ for respirable dust, 0.1 mg/m³ for respirable silica.

The recommended actions should be based on data accumulated over a period of time. Caution should be exercised when only a few air-sampling measurements are available. Generally, if results are repeated more than twice, then the indication is generally confirmed by further testing.

9.0 POTENTIALLY HAZARDOUS AREA

An area shall be classified as a "Potentially Hazardous Area" by the Registered Mine Manager/ Appointed Construction Manager or his nominee (as applicable) if it meets the appropriate criteria in Section 8.0.

The Registered Mine Manager/ Appointed Construction Manager or his nominee (as applicable) may classify other areas as "Potentially Hazardous Areas".

The Registered Mine Manager/ Appointed Construction Manager or his nominee (as applicable) shall:

- Notify all employees in the area, and those who regularly use the area of the classification. This will be facilitated through a Construction Notice. The Construction Notice should be attached to the JHA;
- Effectively define and signpost the area as follows:

WARNING !-
POTENTIALLY HAZARDOUS AREA
USE RESPIRATORY PROTECTION

Details of the occurrence shall be entered into the site fibrous materials register.

9.1 Conditions for Access

All personnel must receive authorisation from the Registered Mine Manager/ Appointed Construction Manager or his nominee (as applicable) before entering a potentially hazardous area. This is facilitated through obtaining a copy of the register and issuing a letter of authorisation to all personnel.

9.2 Training and Awareness

No person shall be authorised to enter a designated potentially hazardous area until they have been trained.

All personnel shall receive training in the following areas:

- Fibrous Minerals awareness training;
- Respiratory awareness training; and
- Respiratory PPE fit testing.

A register of a personnel trained will be maintained.

9.3 Conditions of Entry

9.3.1 Personnel

All personnel outside enclosed pressurised cabins must wear a correctly fitted P2 mask, disposable overalls and rubber boots (or coveralls over boots).

All activities in a potentially hazardous area that are not covered by a Standard Work Procedure shall have a JHA conducted.

9.3.2 Mobile Equipment

Prior to entry all vehicles entering the potentially hazardous area must have cabins that are capable of being effectively sealed. All cabin seals must be checked and verified prior to entry, by use of a smoke bomb.

9.3.3 Dust control

At all times the defined work area is to be consistently watered down to maintain dust suppression.

9.4 Fibre Monitoring

Personnel and static positioning monitoring shall be carried out at all times during operation.

All personnel in the potentially hazardous area shall wear a personal monitor throughout operations.

Static monitors shall be strategically placed throughout the work area, taking into account wind direction etc.

9.5 Decontamination

The removal of PPE shall be completed in the designated area, following this sequence:

- Spray overalls with water;
- Remove the overalls by turning them inside out as they are removed from the body and place them in a disposable bag;
- Wash boots to remove any loose material;
- Finally remove the P2 disposable mask and place it in the disposable bag.

The overalls and dust masks should be disposed of in a double sealed plastic bag as they leave the designated area.

All personnel exiting the potential hazardous area after working outside a pressurised cabin should wash their hands and face thoroughly after removing their PPE.

Immediately after vehicles have exited the potential hazardous area exclusion zone the vehicle shall be washed down at the designated wash down area by personnel wearing P2 dust masks, disposable overalls and gum boots (or boot coveralls). A water tanker will be available for these operations.

All precipitants left after the water from the wash down pad has drained away shall be collected and placed in an approved container for the storage of Fibrous Materials contaminated soils or encapsulated in the works.

Equipment cab interiors will be wet wiped after completion of work in the designated hazardous area.

9.6 Final Decontamination

On the completion of the job air filters shall be removed and disposed of as hazardous materials. Personnel carrying out this task must wear P2 dust masks.

9.7 Monitor and Review

A potentially hazardous area should be frequently assessed to ensure:

- Personal protective equipment is of a sufficient rating for the level of exposure and is being used correctly;
- That the continuing level of exposure warrants the area being declared a potentially hazardous area; and
- That engineering or work practice controls are effective in reducing exposure to personnel to within acceptable levels.

9.8 De-classification of a Potentially Hazardous area

The Registered Mine Manager/ Appointed Construction Manager or his nominee may de-classify a Potentially Hazardous Area if:

- Geological predictions indicate that hazardous minerals are unlikely to be encountered and;
- Monitoring results indicate that fibres in the area are below standards set and;
- Future activities in the area are unlikely to expose hazardous minerals.

10.0 DESIGNATED HAZARDOUS AREAS

An area shall be classified as a "Designated Hazardous Area" by the Registered Mine Manager/ Appointed Construction Manager if it meets the appropriate criteria in Section 8.

The Registered Mine Manager/ Appointed Construction Manager may classify other areas as "Designated Hazardous Areas".

The Registered Mine Manager/ Appointed Construction Manager shall:

- Notify all employees in the area, and those who regularly use the area of the classification.
- Section/fence off or effectively define and signpost the area as follows:

WARNING !- ASBESTOS
DESIGNATED HAZARDOUS AREA
NO UNAUTHORISED ENTRY
USE RESPIRATORY PROTECTION

The Registered Mine Manager/ Appointed Construction Manager shall notify the RTIOEP Site Representative that asbestiform minerals have been identified by a NATA accredited laboratory.

Details of the occurrence shall be entered into the site fibrous material database and a copy sent to the RTIOEP Site Representative.

All personnel must receive written authorisation from the Registered Mine Manager/ Appointed Construction Manager or a person appointed by him to do so, before entering a designated hazardous area.

No person shall be authorised to enter a designated hazardous area until they have been trained in risk management procedures appropriate to their work.

All people, clothing, vehicles and equipment entering and working in a designated hazardous area must be thoroughly decontaminated when leaving or as soon as practical there after.

The use of respiratory equipment outside vehicle/equipment cabins is mandatory for all tasks near dust generating activities.

Airborne fibre monitoring shall occur when works are being conducted in the area. Surveillance monitoring shall be conducted at the perimeter to ensure the demarcation area is sufficient to protect those in adjacent areas. (This may include testing when activities are not occurring in the area as well).

All activities in a designated hazardous area that are not covered by a Standard Work Procedure shall have a JHA conducted.

A designated hazardous area should be frequently assessed to ensure:

- Personal protective equipment is of a sufficient rating for the level of exposure and is being used correctly;
- That the continuing level of exposure warrants the area being designated hazardous; and
- That engineering or work practice controls are effective in reducing exposure to personnel to within acceptable levels.

All the relevant safety precautions detailed in Potentially Hazardous Area should also apply, such decontaminating.

10.1 De-classification of a Designated Hazardous area

The Registered Mine Manager/ Appointed Construction Manager may de-classify an area as "Designated", if:

- Geological predictions indicate that further hazardous minerals are unlikely to be encountered; and
- Monitoring results indicate that activities are well controlled; or
- Future activities in the area are unlikely to expose hazardous minerals;

If further work is to take place in the area, the Registered Mine Manager/ Appointed Construction Manager shall classify the area to a Potentially Hazardous Area.

11.0 SAMPLING STRATEGY

Sampling will be conducted for the following reasons:

- To assess and/or isolate potential problem areas;
- To ensure exposure controls are being effective;
- To monitor routine workplace and long term historical exposure levels; and
- Regulatory compliance.

The strategy adopted will depend on the reason for sampling.

11.1 Assessment

Whenever a new process is started on a project, and asbestos or "toxic" materials have been visually identified or are suspected of being present, an initial monitoring program will be conducted to determine the baseline or background level in the area. An intensive program aimed at covering all locations and occupations in the area in as short a time as possible will follow this up. Sufficient data will be collected to establish a valid statistical distribution for the area.

Monitoring will be by occupation, task or static sampling.

It is anticipated that the majority of monitoring will be assessment monitoring during evaluation and construction due to the constantly changing work activities.

11.2 Evaluation of Controls

Monitoring will be conducted from time to time in specific locations or for specific work practices to ensure that control measures are effective.

This may be instigated by:

- Worker or management requests if they believe a particular task will produce high exposure levels;

- Worker or management request if they believe an item of equipment is a problem;
- The Monitoring Technician if a routine sample has suggested a problem area or work practice; and
- This monitoring will be either by task monitoring or static sampling.

It is anticipated that around 10% of all samples collected will be monitored for this purpose.

11.3 Routine Workplace and Historical Exposure Levels

The sampling strategy is based on occupational sampling of groups having similar job functions and essentially equivalent exposures. There will be a number of activities during the evaluation/construction phase that will fall into this category. These include cleaners, supervisory personnel, surveyors, geologists and positional samples at fixed test points of dining room, wet mess and offices.

It is anticipated that around 10% of all samples collected will be for this purpose.

11.4 Regulatory Compliance

This requires similar sampling strategies to that for routine monitoring and comparison to the occupational exposure standards and action levels. The Department of Minerals and Petroleum (DMP) may stipulate a minimum number of samples and occupations to be covered. (for sites that come under the MSI Act).

All results will be forwarded to the DMP for inclusion onto the CONTAM database.

11.5 Distribution of Results

Sample results will be made available as soon as practicable.

The Registered Mine Manager/ Appointed Construction Manager may, however:

- Issue results with an explanatory note;
- Delay issue of the results until affected persons are notified;
- Delay issue of the results until further testing is conducted;
- Delay issue of the results until an investigation is conducted; and
- Any or all of the above.

The Registered Mine Manager/ Appointed Construction Manager (or delegate) will be responsible for distribution of results to RTIOEP representative and other companies on site.

All results will be forwarded to the DMP for inclusion onto the CONTAM database (for sites that come under the MSI Act).

Company representatives shall ensure that a prominent accessible place is available for results to be displayed.

Company representatives shall ensure that all results are promptly displayed (within 1 day of receipt).

It is the responsibility of these persons to display the results where they are accessible to employees.

It is proposed that sampling noticeboards will be placed at a prominent location on the project.

12.0 RISK ASSESSMENT AND SAFE WORK PROCEDURES

The following are a series of risk assessments and procedures for typical activities associated with this project or could occur in the near vicinity. They are presented as a guide as equipment, conditions and technologies may vary from situation to situation and modification may be required. Notwithstanding, it is expected that the intent of these procedures will be adhered to by all involved with this project.

13.0 GENERAL - ALL PERSONNEL

13.1 Risk Assessment

Because the distribution of fibrous and often “toxic” minerals is relatively unpredictable, the greatest risk of exposure occurs when the least is known about an area - that is, **during exploration or early mining, clearing and drilling works**. People involved in exploration and other fieldwork therefore are required to be especially vigilant, and well trained in recognising, identifying and recording fibrous minerals in the field.

As exploration and evaluation of a deposit continues, and more information is gathered, the distribution of fibrous and “toxic” minerals around and within the deposit becomes more predictable. By the time a deposit is ready to develop, the type and distribution of fibrous minerals (if any) is often well known, and the risk of unexpected exposure is low.

Nevertheless, some level of risk remains and all people involved in exploration, evaluation, development, mining, processing and other field occupations need to:

- Be aware of the risk;
- Be trained in risk minimisation and management procedures; and
- Adhere vigilantly to the procedures.

13.2 Monitoring Protocol

All personnel will be made aware that a monitoring program to quantify exposure to various types of hazardous dusts is occurring on this project. In addition to routine surveillance and monitoring, specific tasks or work in specific geographic areas will be targeted. All personnel will have the opportunity to request that they be monitored. No person on site will be permitted to refuse to be monitored (per section 9.13 of the Mines Safety and Inspection Regulations 1995). Tampering of monitoring equipment will result in site disciplinary action and could result in possible prosecution by DMP.

13.3 Risk Management Procedure

Managers and supervisors will:

- Ensure that all employees and contractors are made aware of the risks of exposure to fibrous minerals and silica, through induction and training;
- Ensure that all employees and contractors are trained in the proper use of personal protection equipment (PPE);
- Ensure that there are employees at appropriate sites that are trained to recognise fibrous minerals;
- Ensure that employees and contractors are trained in the risk management procedures to follow under normal working conditions;
- Ensure that the risks of exposure are adequately monitored and documented;
- Ensure that all appropriate employees and contractors are trained in the procedures to follow when working in designated hazardous areas; and
- Ensure that employees and contractors adhere to these procedures.

All personnel will:

- Comply with dust management and safety procedures; and
- Cooperate with the dust-monitoring technicians/ventilation officer's requests,

14.0 RISK MANAGMENT TECHNIQUES

People and machines operating in excessively dusty or potentially hazardous areas should include the following controls.

Drivers shall:

- Pressurise the cabin by keeping the windows closed and air conditioner running on;
- Avoid driving for long periods in the dust of another vehicle. But if unavoidable, keep vents closed and recirculate cabin air;
- Wear a class 'p1' face mask when unpacking and cleaning dusty gear from a utility or tray-top; and
- Cover loads with snug-fitting plastic tarpaulins which are easy to clean - don't use canvas which traps dust.

Field vehicle maintainers must:

- Inspect the cleanliness of the cabin weekly, and vacuum out as necessary;
- Inspect the door and window seals weekly and replace as necessary;
- Test the air conditioner operation weekly;
- Maintain an inspection logbook.
- Use water or steam to clean down field vehicles prior to commencing work - never compressed air;
- Wear a class 'p1' facemask whenever a dusty task is involved;

- Wear a class 'p1' face mask at all times when working on a vehicle that has operated in a designated area and has not been cleared as “contamination free”;
- Remove interior floor mats for washing at each service or inspection;
- Undertake all washing in a well-drained area with sump to collect and settle the sludge;
- After vacuuming the vehicle interior, empty the dust into a sealable container;
- Replace and dispose of used air cleaner elements in a sealed container;
- Don't attempt to recondition filters using compressed air;
- Recycled air filters must be labelled prior to dispatch to a recognised filter cleaning contractor equipped to handle asbestos contaminated filters;
- Dispose of waste materials by burying them at a designated waste dump;
- Companies conducting vehicle maintenance shall:
 - Develop a standard work procedure (SWP) for this activity.
 - Ensure personnel comply with the SWP.

Ensure that vehicle maintainers conduct JHA on this activity.

15.0 EARTH WORKS

15.1 RISK ASSESSMENT

Any earthworks including foundations for plant, buildings and machinery are sometimes excavated in areas where the geology is poorly defined. Sometimes, the foundations are in areas with a higher than normal risk of encountering fibrous minerals.

Borrow pits and quarries for sheeting and fill are sometimes developed in areas that can contain asbestos or its erosion products. If these contain fibrous minerals that remain unrecognised, contaminated fill could be spread to all parts of the mine, placing the health of the entire workforce at risk of exposure.

Where possible geology sampling and assessment prior to work commencing will identify any areas of concerns and these areas should be avoided where practicable.

15.2 Monitoring Protocol

This activity is a moderate risk task as it usually involves earth-works in ‘topsoils’. Greater risks are likely when earth-works are through fresh rock or erosion products from asbestos containing minerals or high silica content rocks. As such whenever:

- If asbestos materials are suspected (or identified) monitoring will occur; and
- If high silica or “toxic” materials are suspected (or identified) monitoring will occur.

15.3 Risk Management Procedure

Managers/Supervisors shall ensure that:

- Regular geological inspections of all areas to be used for foundation work, borrow pits and quarries are carried out;
- An assessment of the risk of encountering fibrous or high silica minerals is performed; and
- Where a higher risk is identified, ensure that all personnel involved wear class 'P1' face masks (or better).

If any person suspects, or positively identifies the presence of fibrous minerals, that person shall:

- Immediately advise the area supervisor on site.

The area supervisor shall immediately inspect the suspect area and if confirmed or unsure shall:

- Immediately advise all the personnel on site;
- Cease operations at that area;
- Place a signpost saying; 'Suspected Asbestos Contamination - Do Not Enter or Disturb'; and
- Report the suspected occurrence to their manager and the Registered Mine Manager/ Appointed Construction Manager as soon as possible.

The event shall be treated as a "near miss or incident" and applicable documentation and investigations conducted in accordance with the "site incident register" processes.

- Submit the sealed samples to the project registered laboratory for fibre identification.

If the sample is positively identified as asbestos then a risk assessment shall be conducted. The assessment will be conducted by the Registered Mine Manager/ Appointed Construction Manager, the Safety Manager, project Occupational Hygienist and other parties as required.

Once the evaluation is completed, a documented safe working procedure shall be developed.

This procedure shall then be implemented by all persons involved at that area. This may involve further training or education to be conducted.

No work shall occur at that immediate area until the Registered Mine Manager / Appointed Construction Manager approves the activity. Future works in that area will require the appropriate contractors to submit a JHA for their activities.

A copy of the procedure shall be sent to the RTIOEP Site Representative for their records.

16.0 HANDLING AND DISPOSING OF HAZARDOUS WASTE

16.1 Risk Assessment

Asbestos contaminated waste only presents a risk if it is disturbed and dust becomes airborne. Exposure can occur because the content of the material is not known, packaging is not labelled or procedures are not followed. Used PPE rarely presents a dust risk as fibres impinge into the filter media. However, biological agents may be present. Vacuum cleaner bags, residual samples and the like present greatest risk.

16.2 Monitoring Protocol

This activity is a low risk task if procedures are followed. Whenever this activity is occurring, surveillance monitoring will occur.

Task monitoring may occur.

16.3 Risk Management Procedure

The Registered Mine Manager/ Appointed Construction Manager shall:

- Maintain Records of hazardous waste dumps location and approximate content.

A copy of the records shall be sent to the RTIOEP Site Representative.

Managers/Supervisors shall:

- Ensure that contaminated items, (including face masks, disposable coveralls, air filters, sample bags, etc) are buried at the designated hazardous waste dump;
- Ensure that hazardous and contaminated waste is covered by clean fill as soon as practicable to a depth of one metre or maintained in sealed drums;
- Ensure that hazardous waste is placed in areas that will not be disturbed by future activities, such as rehabilitation.

All personnel shall ensure that:

- All used PPE shall be placed in designated bins.

All samples containing hazardous materials are in sealed plastic and clearly labelled

WARNING - CONTAINS ASBESTOS

All sample submission paperwork is labelled.

A list of the potentially contaminated samples shall be sent to the nominated Laboratory and approval obtained before dispatch.