

# Sydney Port Botany Terminal 3 Project

## Hazardous Material and Asbestos Management Plan

### Terms and Definitions

The following terms, abbreviations and definitions are used in this plan:

| Terms | Explanation                                     |
|-------|---|
| SPBT3 | Sydney Port Botany Terminal 3                   |
| CEMP  | Construction Environmental Management Plan      |
| EM    | Environmental Manager                           |
| EPA   | Environmental Protection Agency                 |
| ERAP  | Environmental Risk Action Plan                  |
| OEH   | Department of Climate Change and Water          |
| HMAMP | Hazardous Material and Asbestos Management Plan |
| EIS   | Environmental Impact Statement                  |
| MCoA  | Ministers Conditions of Approval                |

### Distribution

The master 'controlled' Hazardous Material and Asbestos Management Plan (HMAMP) document forms part of the project's CEMP as an Appendix. The controlled copy will be retained in TeamBinder, the Laing O'Rourke document management system, where it can be accessed by personnel as necessary.

All paper copies of this HMAMP will be considered as 'uncontrolled' unless they have been allocated a 'copy number' in a colour other than black.

The client representative will be provided with a copy in conjunction with the submission of the CEMP.

### Issue, Revision and Re-issue

The initial issue of this HMAMP has been reviewed by Laing O'Rourke's Regional Environmental Manager to ensure it meets the requirements of the current EMS and policy, contract, specifications and standards. The plan is approved for use on the project by the Project Director. Evidence of initial review and approval is by signatures on the cover sheet.

In conjunction with the submission of the HMAMP, Laing O'Rourke will coordinate and facilitate an initial HMAMP Workshop with representatives from the client and Laing O'Rourke to discuss the contents and application of the HMAMP to facilitate the approval of the HMAMP and agree the proposed management measures and controls.

Revisions of this HMAMP may be required throughout the duration of the project to reflect changing circumstances or identified opportunities for improvement.

Revisions may result from:

- Management Review
- Changes to the Company's standard system
- Audit (either internal or by external parties)

- Client complaints or non-conformance reports.

Revisions shall be reviewed and approved by the Project Manager prior to issue. Updates to this HMAMP are numbered consecutively and transmitted to holders of controlled copies.

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## 1. Introduction

This Hazardous Material and Asbestos Management Plan (HMAMP) has been developed to address the construction activities associated with the Sydney Port Botany Terminal 3 (SPBT3) Project.

Development of Sydney Port Botany Terminal 3 will involve the construction of onshore civil infrastructure including container stacking areas. The proposed Terminals have four berths with a total length of 1,180 m. The approximate Terminal area, excluding the Wharf area is 46 ha.

The key components of the Sydney Port Botany Terminal 3 include:

- Ground treatment and consolidation measures
- Drainage, utilities, services
- Container yard
- HV & LV electrical
- Buildings
- Rail yard.

### 1.1 Objective

This document outlines asbestos and hazardous material management and procedures for activities undertaken on the SPBT3 Project.

The HMAMP may be revised during the course of the project as more information becomes available. Operating conditions may change as the work progresses, which may require some modifications to certain portions of this plan.

This HMAMP aims to satisfy the following objectives on this project:

- Address the requirements of the planning approval for the SPBT3 Project
- Address the requirements of the Environmental Impact Statement (EIS) for the Port Botany expansion
- Address the requirements outlined in the Aurecon Framework Construction Environmental Management Plan
- Address the requirements of the relevant environmental legislation as it applies to this project
- Address the requirements of the Environment Protection Licence issued for the works undertaken for the SPBT3 Project

Responsibilities for the implementation and management of this HMAMP are in accordance with the Project's Construction Environmental Management Plan.

### 1.2 References

- Protection of the Environment Operations Act, 1997
- Occupational Health and Safety Act 2000
- Occupational Health and Safety Regulation 2001
- WorkCover Authority of NSW requirements
- WorkSafe Australia - Asbestos: Code of Practice and Guidance Notes
- Environmentally Hazardous Chemicals Act 1985
- Code of Practice for the Safe Removal of Asbestos, 2nd Edition (NOHSC 2005)

- Guideline: Your Guide to Working With Asbestos (WorkCover 2008)
- National Code of Practice for the Control of Workplace Hazardous Substances [National Occupational Health and Safety Commission: 2007(1994)]
- Waste Classification Guidelines (DECC 2008)

Reference is made to the NSW Protection of the Environment Operations Act which integrates in to one Act all the controls necessary to regulate pollution and reduce degradation of the environment. The Act also provides for licensing of scheduled development work, scheduled activities and for offences and prosecution under this Act.

## 2. Roles and Responsibilities

| Personnel   | Responsibilities   |
|---|--|
| All Site Workers  | <ul style="list-style-type: none"> <li>• Take reasonable care for their own safety and the safety of others</li> <li>• Follow all safety and environmental instructions, particularly with reference to asbestos</li> <li>• Immediately cease works when encountering suspected asbestos or other hazardous materials</li> <li>• Notify Supervisors and/or Safety/Environmental representatives when working in Asbestos affected areas or encountering Asbestos onsite</li> </ul> |
| Project/Construction Managers, Safety and Environmental Representatives | <ul style="list-style-type: none"> <li>• Engage only suitably qualified and competent staff and contractors</li> <li>• Issue this HMAMP, updating as necessary and managing compliance</li> <li>• Ensure all workers are properly inducted on the procedure for working in Asbestos affected area and the discovery of unexpected/suspected Asbestos materials</li> </ul>  |
| Onsite Environmental Sub-Contractors and AS1 / AS2 Licensed Contractors | <ul style="list-style-type: none"> <li>• Ensure all asbestos affected material is handled and disposed of in accordance with relevant legislation</li> <li>• Manage the excavation and removal of unexpected asbestos discoveries</li> <li>• Co-ordinate with project management and relevant authorities when removing asbestos affected material</li> </ul>  |
| Site Visitors   | <ul style="list-style-type: none"> <li>• Follow all directions issued by the staff accompanying them and Safety/Environmental Representatives</li> <li>• Not to enter Asbestos affected areas without the expressed permission of project management staff</li> </ul>  |

Roles and responsibilities are outlined below:

- Where known or suspected Hazardous or Asbestos Affected Material is to be disturbed, works are to be conducted only by appropriately licensed and inducted contractors. All works are to be undertaken in accordance with the work method statements approved by Laing O'Rourke
- Onsite environmental remediation sub-contractors or licensed environmental hygienists are to provide supervision for activities involving hazardous materials to ensure all works are carried out in an appropriate manner. Upon completion of the works, a report detailing the works and clearance of the area is to be submitted to Laing O'Rourke

### 2.1 General Site Specific Considerations

If Hazardous Material, Asbestos Containing Materials or Suspected Asbestos Containing Materials are discovered, work is to cease immediately and the Unexpected Asbestos/Hazardous Material Field Plan implemented (Appendix 1). An appropriately qualified environmental hygienist is to be engaged to confirm the nature of the material. If confirmed as hazardous, work is to be undertaken in accordance with this HMAMP and the environmental

hygienist procedures. The Site Safety Representative or Environment Manager is to complete the Unexpected Contamination Finds Record Sheet (Appendix 2) and update the Contamination Register (Appendix 3).

Fragments of asbestos cement and asbestos fibres in soil are classified as friable, which prescribes a more cautious approach to work that may disturb the materials. As a result, all works involving asbestos must be undertaken by an AS1 licensed contractor.

The safety procedures described in this HMAMP must be implemented and adhered to during the excavation, backfilling and handling of identified asbestos contaminated soil and surface fragments, where present. In the instant that the environmental hygienist or asbestos removalist positively identifies actual or potential asbestos contamination, all personnel are to cease work. All asbestos subcontractor documents are to be checked against the methods and procedures outlined in this HMAMP.

The area must be secured and exposed soil covered with plastic sheeting or Geo-textile Fabric, and excavated materials stockpiles should be covered to minimise the mobilisation of asbestos fibres. Where covering the material is not possible, the material must either be wet down with water or spray emulsions to prevent the material from drying out. These measures are to be maintained until materials are assessed and a comprehensive full friable asbestos removal procedure can be implemented.

When works are being conducted in asbestos affected areas, airborne asbestos monitoring is to be undertaken by a competent asbestos air monitoring consultant. The consultant is to be independent of the asbestos contractor. Should the monitoring detect fibre levels above the lowest detectable level (<0.01 fibres/mL of air), works will again cease until more stringent controls can be implemented.

## **2.2 Asbestos Removal**

This section of the HMAMP outlines the OHS/Environmental procedures which are to be enforced during excavation/removal works for asbestos impacted soils within the Headland Park site. This HMAMP does not override the requirements of legislation and accepted minimum standards, which apply to works involving the removal of hazardous materials.

This procedure must be read in conjunction with the most recent version of the Work Method Statements (WMS) or Job Safety Analysis (JSA) supplied by the appropriate contractors.

### **2.2.1 Overall Requirements**

If bonded asbestos is encountered and confirmed during works with no asbestos impacted soils present, an AS2 contractor can be utilised to collect and take the asbestos waste to an appropriately licensed facility. A Work Cover permit is required to remove 10m<sup>2</sup> or greater of bonded asbestos material.

The general requirements that apply to the excavation and removal of asbestos impacted soils are as follows:

- The asbestos contractor will determine the specific requirements and procedures for this scope of works. These procedures will be reviewed and approved by Laing O'Rourke prior to commencement.
- An asbestos exclusion zone is to be set up around the impacted area. This area must be clearly sign posted with delineation fences/tape/barriers around the perimeter.
- No person(s)/plant are permitted to enter this exclusion zone without the expressed consent of the environmental hygienist / licensed contractor and appropriate PPE must be worn at all times. The workforce on site will be provided with a pre-start/toolbox relating to the requirements of the exclusion zone.

- Plant operators/truck drivers can work within the exclusion zone without an AS1 license under the supervision of an AS1 licensed contractor, provided that the machines are sealed (i.e. windows closed) and the air conditioning is set on internal recirculation only.
- Plant operators/truck drivers are not permitted to exit the vehicle within the exclusion for any reason (except fire evacuation, where it is still preferable to drive the vehicle out of the exclusion zone before evacuating).
- Where a plant operator holds an AS1 license, the operator can work independently within the exclusion zone, however it is still recommended that there be another AS1 licensed contractor present to complete works outside of the vehicle.
- Personnel handling the impacted soil /material must have the appropriate training and experience for handling asbestos material and requirements for decontamination procedures. This work must be carried out by an AS1 licensed contractor / environmental hygienist. Laing O'Rourke will confirm that the contractor has appropriately trained and experienced personnel undertaking the work.
- All personnel operating machinery involved in excavations, stockpiling and movement of fill must adhere to the requirements of this HMAMP and follow the directions of safely/environmental representatives and AS1 licensed contractor.

Prior to works commencing in an area of known asbestos impact, a designated works zone (exclusion zone) must be set up with barriers along the boundary. Where unexpected asbestos is encountered, this exclusion zone must be set up as soon as practical.

The access requirements for the exclusion zone will be outlined in a pre-start or toolbox briefing for the workforce.

### 2.2.2 Restricted Access to Area

Access to the worksite will be determined by Laing O'Rourke, while access to exclusion zones will be the responsibility of the AS1 licensed contractor in conjunction with Laing O'Rourke.

Should asbestos be found during excavation works within the site, the area would be deemed as inaccessible to non-inducted persons (with the exception of emergency services). Persons needing to enter this area will need to be inducted into the project and the hazards of the exclusion area. The AS1 contractor will be required to develop a site specific induction for personnel who are required to enter the exclusion zone. This will be delivered to all personnel who are required to enter the exclusion zone.

### 2.2.3 Disposal of Asbestos and Asbestos Impacted Materials

All visible asbestos and asbestos impacted material will be removed from the site during the earthworks stages of the project. All of this material is to be taken to an appropriately licensed waste management facility.

Fragments of asbestos waste, handpicked under the supervision of the environmental hygienist / AS1 licensed contractor, must be collected and double bagged in heavy duty, low density polyethylene bags (0.2mm thick). These bags are to be filled to no more than 50% capacity, and marked as 'Asbestos Waste'. The bag is to be 'double necked' and sealed by wire ties or tape and must not exceed a weight of 20kg.

All sealed asbestos waste bags are to be transported in leak proof containers/vehicles to a waste management facility approved by the NSW Office of Environment and Heritage (OEH) to handle asbestos waste. Bags used to transport asbestos shall not be re-used, and any container marked for asbestos material transport shall not be used for any other purpose.

Care must be taken to avoid rupturing any of the plastic bags used to handle and transport the asbestos waste. In particular the bags are not to be thrown or dropped from a height as this can risk tearing the bags. The integrity of all bags is to be confirmed prior to the bags being transported offsite.

Where slurries are suspected of containing asbestos material, the slurry is to be transported in a lined/leak proof truck in a manner that prevents any waste from escaping. Upon transporting the material to a licensed facility, the transport vessel must be thoroughly decontaminated prior to being used to transport any other form of waste.

Stockpiled asbestos impacted spoil is to be removed from the site in haulage trucks with covers. The covers must completely cover the load to prevent any material from escaping the haulage truck during transport.

### **2.3 Environmental Protection Measures**

In order to protect the safety of all employees working within the project, the following minimum environmental controls must be implemented when working with hazardous materials, asbestos or potentially asbestos impacted spoils. These controls include:

- Pre-work Site Protections
- Dust Suppression Measures
- Surface Water Protection Measures
- Stockpile Management Measures
- Equipment Decontamination Procedures.

These measures are to be detailed and documented by the asbestos contractor and must be stringently adhered to in order to prevent any asbestos related hazards. The asbestos contractor will be required to submit and have approved the proposed control measures prior to commencement.

#### **2.3.1 Pre-Work Site Protections**

Prior to any works commencing within Asbestos Impacted Areas a number of safety controls must be in place to minimise the risk posed by the material. Plans of the works need to be submitted to Laing O'Rourke for review prior to commencing works. These plans must include details on the protection measures to be used, proposed methodology and risk assessments for these activities.

All employees working in these areas must be properly inducted by the asbestos licensed contractor about the planned works and the risk posed by these works. All employees must wear the personal protective equipment (PPE) required by the asbestos work method statements for working within an asbestos impacted area.

As previously detailed the exclusion zone must be delineated and signposted to prevent accidental egress from non-inducted employees. The worksite must be secured in a manner so as to prevent cross contamination of non-affected areas, such as laying plastic down on areas where vehicle movements will occur. Specific barriers will be provided around stockpiles to prevent material spilling out of the designed stockpile area.

#### **2.3.2 Dust Suppression Measures**

Dust from an Asbestos impacted area poses a significant risk to employees working within the area and the surrounding public. As such, all possible measures must be in place to suppress dust during the operations.

Factors that contribute to dust generation include but are not limited to:



- Wind blowing across a cleared area of the site, particularly during extended periods of hot/dry weather or during high wind periods
- Loose or stockpiled material
- Movement of plant over loose unsealed surfaces on the worksite.

In order to suppress dust within asbestos impacted areas the following measures need to be implemented by the employees working in the area:

- Dampen access tracks and loading area with water cart or similar controls
- Dampen or cover (with plastic or spray emulsion) all asbestos affected stockpiles
- Where practical, install wind breaks around asbestos affected stockpiles. This may be in form of, for instance, concrete barriers or separate delineated stockpiles
- Cease works in strong winds or when dust generation cannot be avoided
- Undertake all loading/unloading of soils close to the stockpile to prevent spreading the material around the site.

### 2.3.3 Surface Water Protection Measures

As most dust suppression measures would involve the use of water, there is the potential for contaminated surface water to be present within asbestos impacted areas. In order to prevent contaminated surface water from entering adjacent waterways/drainage lines, specific controls must be implemented around hazardous materials or asbestos impacted areas.

Sediment fences or sandbag walls must be installed around the perimeter of the exclusion zones or stockpile to prevent surface water from escaping these areas. These controls must remain in place until all of the material has been removed from the area. Only once the last of the material has been loaded and all of the plant decontaminated, can the controls be removed. These controls would be considered as hazardous or asbestos impacted waste and as such should be placed onto the truck containing the last load of material for disposal at a licensed facility.

Hazardous or asbestos impacted materials should not be stockpiled within 20 metres (preferable not within 40 metres) of natural watercourses or drainage lines as per the CEMP. Where stockpiles are in close proximity to waterways, additional sediment controls, such as duplicate sediment fences/sandbag walls must be installed to minimise the risk of contaminated surface water entering surface watercourses.

### 2.3.4 Stockpile Management Measures

Occasionally hazardous or asbestos impacted materials may need to be stockpiled prior to removal from site. These situations include when asbestos impacted soil is not identified until the material is unloaded or when works cannot be halted for extended periods. These events will require specific stockpile management plans or ERAPs to be implemented to avoid cross contamination of un-affected stockpiles. Additionally, stockpiles of asbestos impacted soil can pose a significant risk of producing dust as the stockpile dries out.

In order to minimise the risk posed by stockpiled asbestos impacted materials, the following measures should be implemented:

- Locate the stockpile as far away from other stockpiles of material on the site as possible/practical. Stockpiled material must be located well away from watercourses or neighbouring residential premises. If stockpiles need to be relocated, they must be relocated onto single ply plastic sheeting to reduce the potential for cross contamination

- Create an exclusion zone around the stockpiled material to keep other personnel a safe distance from the material
- Clearly label/tag stockpiled containing asbestos impacted materials. This can include delineating the stockpile with caution tape and labelled survey pegs
- Ensure the stockpile does not generate dust during high wind or temperatures. This can be achieved through the use of water sprays to keep the material damp or by covering the stockpile with Plastic/Geo-textile Fabric or Spray Grass Emulsion (without seed mix)
- Place sandbag walls or sediment fences around the base of the stockpile to capture any potentially contaminated surface water run-off
- Limit the number of plant working with the stockpile as much as practical. All plant must be decontaminated prior to being used for other purposes
- Notify Safety and Environmental Representatives of the location of asbestos impacted stockpiles. This can include supplying a site map with the stockpile location and associated controls clearly marked.

#### 2.3.5 Decontamination of Equipment

Should asbestos be found during excavation, machinery used for excavation must be decontaminated by washing down prior to leaving the site. The decontamination must be carried out such that cross contamination to site soils does not occur. The wash down area will be validated through a 'emu pick' and soil sampling to confirm that cross contamination has not occurred.

Once the excavator has finished, the excavator bucket and tracks are to be decontaminated in the designated decontamination area. The decontamination area is to be fitted with single ply plastic sheeting where the excavator will drive on to for decontamination. The decontamination will involve hosing and removing soil from the tracks and bucket as best as practical. Following decontamination the plastic sheeting is to be rolled up and placed in the final truck to leave the site.

The loads on all trucks are to be covered with tarpaulins prior to leaving site, to minimise loss of contaminated materials and the generation of dust during transport.

### **2.4 Tracking of Hazardous and Asbestos Impacted Material**

The movement and stockpiling of hazardous or asbestos impacted materials must be tracked from cradle to grave in accordance with the Department of Environment and Climate Change (DECC) Waste Classification Guidelines 2008. Tracking of the material is the responsibility of Laing O'Rourke and the asbestos removal contractor. Copies of tracking documentation must be supplied to the Environmental Representatives.

Tracking logs and location maps should be updated daily, or as required. All tracking documents must be retained in the project filing system. Tracking documents will include quantities, vehicle registration details and disposal dockets as objective evidence that asbestos has been disposed of at a licensed disposal facility.

## **3. Results and Records**

All reports and monitoring results will be filed in accordance with the project filing system. The Unexpected Find Record Sheet and Register are to be completed and used to track the status of the find and whether it is safe to recommence work.

All records generated in relation to the management of hazardous waste will be filed in accordance with the project filing system. The following checklists will be completed to demonstrate compliance with this procedure:

- Unexpected Find Record Sheet
- Unexpected Find Register
- Form F 1227 Weekly Environmental Inspection Checklist located in the CEMP.

## Appendix 1 Unexpected Asbestos/ Hazardous Material Field Plan

### Unexpected Asbestos/Hazardous Material Field Plan

The logo for Laing O'Rourke, featuring the company name in white capital letters on a black rectangular background, with a yellow horizontal line above and a red horizontal line below the text.

#### Distribution: All Staff and Sub-Contractors

Due to the nature of this project it is possible that Asbestos or other Hazardous Materials may be encountered at unexpected locations during the project. In the event that these materials are encountered the following procedure is to be followed to ensure the situation is managed in a safe and appropriate manner.

Should you or any of your work colleagues encounter Asbestos the following should be carried out without exception:

Immediately cease all works. There are no exceptions to this rule.

Advise your Site Supervisor, the safety officer and environmental representative.

Upon advising the appropriate persons, secure the area (unless deemed unsafe to do so). Securing the area can involve covering the area with plastic or geo-fabric and installing barricades and warning signs.


Implement dust suppression techniques (i.e. wetting down) as required.

Contact a qualified consultant to assess the material, and confirm the presence/absence of asbestos (to be contacted by the Site Supervisor, Safety / Environmental Representative or Project Engineer).

Once a consultant has confirmed the status of the material and if asbestos is present, the contaminated material must be removed by appropriately licensed contractors. All contaminated material must be taken to a licensed facility, with tip dockets supplied to the environmental representatives.

Only once the material has been removed and the area deemed as clear by an Environmental Hygienist can works re-commence within the area.

## Appendix 2 Unexpected Contamination Finds Record Sheet

|   |   |
|---|---|
|  | <h1 style="margin: 0;">Unexpected Contamination Finds Record Sheet</h1> |
|---|---|

### Initial Inspection / Actions Undertaken

|   |  |                    |  |
|---|--|--------------------|--|
| UNEXPECTED FIND ID<br>(GET FROM REGISTER)   |  |                    |  |
| DATE / TIME:  |  | PERSON INSPECTING: |  |
| LOCATION:   |  |                    |  |
| OBSERVATION OF MATERIAL   |  |                    |  |
| WORKS THAT LEAD TO THE UNEXPECTED FIND  |  |                    |  |
| ACTIONS UNDERTAKEN TO ADDRESS UNEXPECTED FIND AND MANAGE HEALTH OR ENVIRONMENTAL HAZARDS? |  |                    |  |

### Sampling / Clearance Reports

|   |          |  |  |
|---|----------|--|--|
| IF SAMPLES COLLECTED WHAT ARE SAMPLE IDS?                             |          | IF SAMPLES COLLECTED WHAT IS ANALYTICAL SUITE (INCLUDE RATIONALE)? |  |
| REFERENCE DOCUMENTS   |          |  |  |
| CAN WORK RECOMMENCE? (Circle)   | YES / NO |  |  |
| IF ANSWER IS 'NO' IDENTIFY AREA IN WHICH NO WORK SHOULD BE UNDERTAKEN |          |  |  |

### Disposing of material / Closing out Find

|                                    |                              |          |  |
|------------------------------------|------------------------------|----------|--|
| RECOMMENDATIONS FOR FURTHER ACTION |                              |          |  |
| ANY OTHER COMMENTS                 |                              |          |  |
| SIGNED                             | Environmental Representative | Engineer |  |

**Appendix 3 Contamination Register**

| Contamination Register |      |          |                       |          |                      |                               | LAING O'ROURKE  |
|------------------------|------|----------|-----------------------|----------|----------------------|-------------------------------|---|
| Unexpected Find ID     | Date | Location | Inspection Report No. | Material | Clearance Report No. | Is work area safe to proceed? | Waste disposed of at licensed landfill as "special waste" |
| 1                      |      |          |                       |          |                      |                               |   |
| 2                      |      |          |                       |          |                      |                               |   |
| 3                      |      |          |                       |          |                      |                               |   |
| 4                      |      |          |                       |          |                      |                               |   |
| 5                      |      |          |                       |          |                      |                               |   |
| 6                      |      |          |                       |          |                      |                               |   |
| 7                      |      |          |                       |          |                      |                               |   |
| 8                      |      |          |                       |          |                      |                               |   |
| 9                      |      |          |                       |          |                      |                               |   |
| 10                     |      |          |                       |          |                      |                               |   |
| 11                     |      |          |                       |          |                      |                               |   |
| 12                     |      |          |                       |          |                      |                               |   |
| 13                     |      |          |                       |          |                      |                               |   |
| 14                     |      |          |                       |          |                      |                               |   |
| 15                     |      |          |                       |          |                      |                               |   |
| 16                     |      |          |                       |          |                      |                               |   |
| 17                     |      |          |                       |          |                      |                               |   |
| 18                     |      |          |                       |          |                      |                               |   |
| 19                     |      |          |                       |          |                      |                               |   |
| 20                     |      |          |                       |          |                      |                               |   |
| 21                     |      |          |                       |          |                      |                               |   |