FACT SHEET

ASBESTOS REMOVAL AND DISPOSAL AT EBAC

What regulations apply to asbestos removal?

Asbestos removal and handling are strictly controlled under the Victorian Occupational Health and Safety Regulations, 2017 Part 4.4.

(1) A Class "A" asbestos removal licence holder must, so far as is reasonably practicable, enclose the area where the Class A asbestos removal work is performed to prevent the release of airborne asbestos fibres.

(2) For sub regulation (1), a Class "A" asbestos removal licence holder must ensure, so far as is reasonably practicable, that the enclosure is smoke-tested by using a smoke-generating device to detect any leaks or other deficiencies in the enclosure before asbestos removal work commences.

(3) A Class A asbestos removal licence holder must, so far as is reasonably practicable, use a wet method when performing Class "A" asbestos removal work.

(4) For the purposes of sub regulation (3) wet method means the use of water or another wetting agent on the asbestos but does not include the use of a high-pressure water jet.

All Friable or Class "A" asbestos removal will be conducted within a sealed enclosure that is under negative air pressure controlled by negative air units that (a) eliminates the release of airborne asbestos fibres; and (b) prevents the contamination of areas adjacent to the asbestos removal.

Class "B" asbestos, that is bound asbestos such as asbestos sheeting, requires that special precautionary safe work methods are used in its removal as well. Removal of this material does not require encapsulation, but it must be double wrapped in 200 micron sheeting and/ or placed in asbestos bags following removal for disposal at the EPA licensed site.

EBAC intends to conduct random air monitoring at demolition fence boundaries, over and above the day-to-day monitoring for asbestos fibres within the planned demolition areas to ensure no release of fibres above the prescribed limits is occurring within the site. These monitoring results will be regularly posted on the https://ebacdemolition.com.au/ web site within 24 hours of their receival.

Are all products containing asbestos considered a health risk?

All asbestos containing products have the potential to cause health risks once disturbed. All products containing asbestos must be treated and disposed of according to the required legislated requirements.

Do the asbestos fibre limits used contain a suitable safety margin prior to anybody being exposed to excessive levels?

The exposure standard for all types of asbestos is 0.1 fibres/mL, however when occupational air monitoring is carried out during asbestos removal, the limit is 0.01 fibres/mL. i.e. 10 times less than the allowable limit. This then allows advanced warning if a breakdown in dust control mechanisms occurs, prior to the maximum legal safety level being reached.

Is it true that one asbestos fibre can kill you?

No, asbestos fibres exist naturally within the air we breathe. This is due to asbestos being both a natural product and the fact is has been extensively used over the last 100 years. Significant amounts of asbestos sheeting still exist on buildings today and this is safe if it is handled and disposed of appropriately. It is the release of fibres into the air above the legal limit of 0.1 fibres/mL that causes risk.

ENERGY BRIX AUSTRALIA

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Do you know where the asbestos is in the old Morwell Power Station?

Since asbestos was identified by the SECV as a hazardous material, EBAC has kept a very detailed asbestos register, identifying areas where asbestos has been detected and removed. This register is updated as new discoveries are made. In addition to this listing, extensive onsite testing and sampling has been conducted over the last 12 months in areas that had not been previously tested and further testing is planned by the selected demolition contractor. A review of onsite design drawings has also been conducted to identify potential locations.

How will asbestos be removed from the old Morwell Power Station?

Asbestos removal will be scheduled for removal to match the planned demolition sequence on the structures. Where this involves Class "A" asbestos removal, the areas will be scaffolded, tented, smoke tested to verify appropriate sealing and then have negative air units applied prior to asbestos removal commencing.

All asbestos removed from these types of areas is fully sealed and wrapped prior to it being removed from the encapsulation to ensure no contamination occurs outside of the tented areas. Once stripping is complete, it is inspected by the independent hygienist; if acceptable it is then sprayed with PVA to entrap any fugitive fibres that may still be present.

Once dry, air monitoring is conducted inside the enclosure to ensure that levels are <0.01f/mL. On satisfactory results being obtained, the encapsulation and the decontamination units along with the negative air units are removed. The area is then re-inspected by the independent hygienist and the results recorded.

Is the contractor suitably trained in asbestos removal?

Yes, one of the conditions of the demolition tender being issued was that the contractor had asbestos removalists qualified and trained to the required Australian and Victorian standards.

Extensive contract audits have been conducted on both the demolition contractor and its asbestos removalist contractor to ensure the best possible contractors for the process. Both the asbestos removal contractor and the demolition contractors selected have extensive experience in managing large demolition projects containing asbestos.

How do we know it will be done safely?

There will be audits on the removal of the asbestos conducted by a fully qualified independent hygienist along with independent audit checks by EBAC's staff. The hygienist will be on site during all asbestos removal and disposal activities. All appropriate Health and Safety guidelines will be followed. We also expect that WorkSafe, as the Health and Safety responsible agency, will also be conducting random audits onsite during asbestos removal.

A presentation is planned to both WorkSafe and the Environment Protection Authority (EPA) on how the demolition contractor intends to approach both asbestos removal, asbestos disposal and building collapse during demolition.

Where will asbestos be disposed of once it is removed?

The best disposal point has been under active discussion between EBAC, the Latrobe City Council and ENGIE Hazelwood for the last four months. Following full evaluation of all options, EBAC still believes its onsite option is the best overall solution.

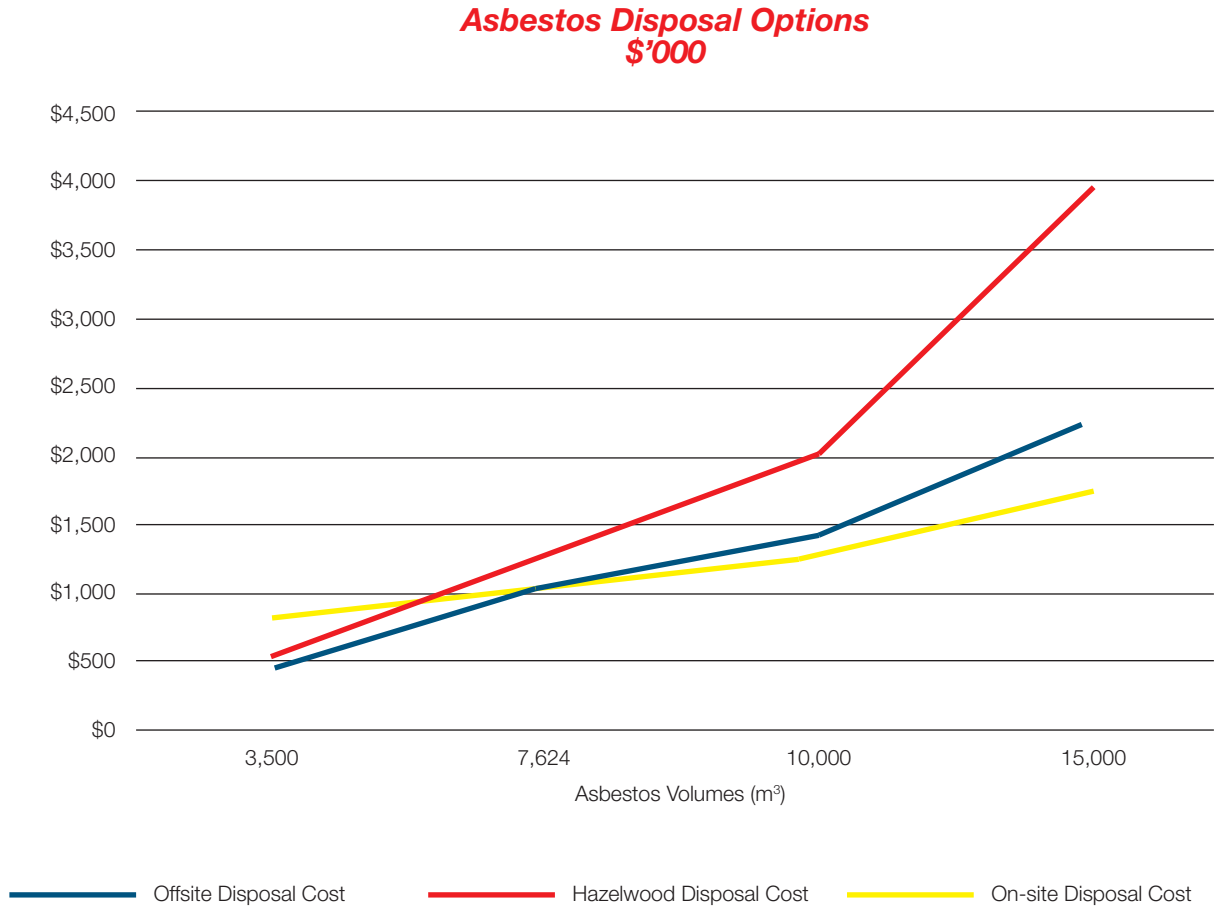
The cell design has been completed by GHD, the design has been independently reviewed and approved by an independent environmental auditor, and an EPA works approval has been granted. Council will vote on a planning permit approval for this cell on Monday 1 October 2018.

Why does EBAC believe the onsite disposal is the best option?

The onsite cell is the safest option as the haulage distance from the work site is the shortest. All asbestos disposed into the cell is fully encased or wrapped so no fibres can escape. In addition, following the placement of material in the cell it must be earth covered at the end of each working day. Hence the local disposal option provides no opportunity for fibre release, provides the lowest risk of traffic incidents and is the most cost-effective solution.

Dependent on the quantities of asbestos required to be disposed of, it also reduces a significant risk of disposal cost blow-out to the project if large quantities of asbestos are produced from the demolition. These resultant savings can then be used potentially to remove additional asbestos sheeting from other buildings across the site, again making the site safer for future uses (note: removal of this additional sheeting will require Heritage Victoria approval).

The estimated cost of the various disposal options, inclusive of transportation cost is shown below:



ENERGY BRIX AUSTRALIA

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Why do Hazelwood disposal costs increase so significantly after approximately 10,000m^3?

ENGIE Hazelwood has quoted EBAC a rate per tonne of material up to 11,000t and then a higher rate after 11,000t including an EPA landfill levy of $30 per tonne. EBAC has no insight into how these rates have been prepared. Also, if EBAC asbestos volumes are at the higher end of the anticipated range, it will also be heavier in weight as it can only result from brick work contamination which EBAC is planning to avoid. This increasing weight per m^3 significantly increases offsite disposal costs at Hazelwood. Disposal weight for onsite disposal is not a consideration as EBAC is only managing volume within a defined cell. EBAC will pay no fees based on weight.

EBAC understands the Hazelwood cell will not be available for use until April 2019, approximately five months after EBAC expects to commence asbestos removal. EBAC believes it would be very inefficient for ENGIE Hazelwood to operate its cell during the period it is not using the cell and this is reflected in the costs quoted to EBAC.

Does the EBAC cell need to be monitored regularly after capping?

Yes, all landfill cells must be monitored once the final cap is installed. EBAC will monitor, and if necessary maintain, leachate levels within the cell to ensure that an excessive build-up in leachate does not occur. The final cap is the primary environmental control to ensure that the buried asbestos does not become exposed in the future. The cap will be regularly inspected over the long term to ensure that its integrity is maintained. Maintenance works will be undertaken as necessary to mitigate the possible effects of wind and water erosion or the burrowing of animals.

In the early years, some subsidence of the capping is also normal, so this area will be inspected regularly and rectification works undertaken as necessary. The cell is designed to shed surface water once capped, so minimal leachate is expected within the cell once the final capping is installed. Asbestos does not migrate through soil and the cell is clay lined, so underground leakage is considered an insignificant risk.

How many times will the cell be used per month?

This will be purely dependent on the quantities of asbestos being produced. Currently it is estimated that the cell disposal rate should be approximately 500m^3 per day. On this basis, even under the highest quantities of asbestos for disposal, the operation of the cell would only likely occur on 2-3 days in each month.

Is there a risk of dust being generated during cell construction or disposal?

The disposal cell is not large (approximately 80m X 40m) so its surface area is quite small (about two and a half times larger than an Olympic size swimming pool). In addition, it is clay lined so its propensity to cause dust is quite low. Earth material removed during the construction of the cell will be compacted in small stockpiles to minimise dust generation during high wind days. Disposal of asbestos into the cell will also be minimised or, if necessary, avoided during high wind events in the direction of residents as a matter of courtesy. These dust control measures are specified in the site's Environmental Management Plan.

Will asbestos from other sites be deposited into this cell?

No, the cell is licensed for EBAC material disposal only.

What will happen if the Latrobe City Council does not approve planning submission for the asbestos cell?

Due to the delays in this approval, EBAC already has no choice but to send some of its early asbestos removal material via road to external disposal cells at Bulla. However EBAC wants to minimise this traffic where possible as it creates additional transportation risk that can be avoided. Hence, EBAC is seeking approval for the construction of the disposal cell onsite as it poses no risk to the surrounding community.