

Remediation of the Former Cresco Site, Bayswater

Waste Management Plan

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1. Introduction

This Waste Management Plan (WMP) has been prepared by Parsons Brinckerhoff (PB) on behalf of CSBP for the remediation of the former Cresco fertiliser site in Bayswater. This plan has been prepared as part of CSBP's environmental management commitments as outlined in the *Final Remediation Works for the Former Cresco Site, Bayswater, Public Environmental Review* (PB, 2004). This waste management plan often refers to information contained within the PER document and therefore these documents should be read in conjunction.

This plan has been prepared following the requirements of the Department of Environment (DoE) Contaminated Sites Management Series and will be submitted to the DoE for approval prior to the commencement of remediation works.

As part of the overall environmental management for the proposed site remedial works, waste handling, transportation, noise and dust issues associated with remediation activities, has been addressed in the following documents:

- Traffic Management Plan (PR_13192RevE.doc);
- Dust Management Plan (PR_13230RevJ.doc);
- Noise and Vibration Management Plan (Herring Storer Acoustics Ref 5325-1-05179);
- Waste Management Plan (PR_13226RevE.doc); and
- Monitoring and Reporting Plan (PR_14245RevD.doc).

As covered in the Public Environmental Review (PB 2004), the overall remediation of the site requires demolition of infrastructure, and the removal/excavation of contaminated waste to enable the redevelopment of the site consistent with its current zoning of industrial/commercial. The Public Environmental Review (PER) (Parsons Brinckerhoff 2004) was based upon extraction and disposal to landfill of contaminated soil. This plan identifies appropriate management measures for material storage and ensures the safe disposal of contaminated soils and hazardous waste (e.g. asbestos containing material).

Specific details on volumes and types of waste and the appropriate management measures are contingent upon the site remediation phases, timeframes and the outcomes of groundwater and soil remediation activities. Therefore, this is an evolving document and details will be added as they become available.

1.1 Objectives

The objectives of this Waste Management Plan are to:

- ensure that waste material removed/excavated from the site is appropriately managed;
- keep an inventory of the type and quantity of materials being transported to landfill; and
- to ensure the safety of workers and site visitors that may come into contact with contaminated soils, waters or hazardous materials onsite.

1.2 Project Overview

The current site layout is shown in *Figure 1.1*, and a summary of the remediation proposal is provided in *Table 1.1*.

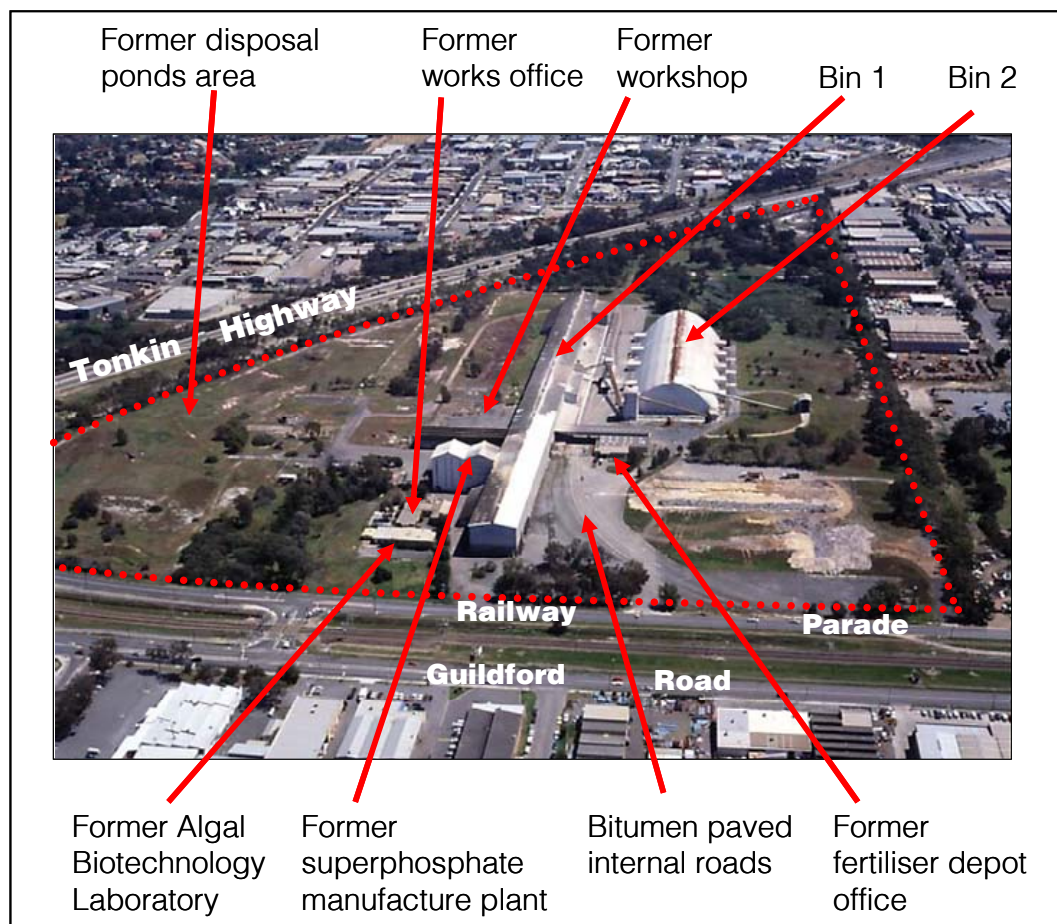


Figure 1.1: Current Site Layout

Table 1.1: Summary of the Remediation Proposal

Element	Description
Volume of contaminated soil material:	Approximately 280,000 cubic metres of soil material containing heavy metals, fluoride compounds and acid generating compounds and other contaminants.
Remediation of soil contamination:	Excavation and either removal to landfill or treatment and reuse onsite.
Management of groundwater contamination:	Abstract and treat groundwater to remove contaminants. Disposal of treated groundwater via infiltration onsite or direct discharge to the Bayswater Main Drain.
Remediation time frame:	Approximately 5 years.
Area for remediation:	Approximately 37 hectares.
Infrastructure, including buildings:	Removed to suitable disposal sites.

The three aspects of remediation are addressed within this Waste Management Plan:

- demolition of existing buildings and other infrastructure and transport to landfill;
- bulk soil excavation and haulage to landfill; and
- lime dosing of groundwater.

The purpose of the final remediation of the former Cresco Fertiliser site, Bayswater is to remove the contaminated soils and hazardous materials such that the site is suitable for its intended future landuse.

The main concern for remediation of the site is the removal of soil with contaminant concentrations exceeding the HIL "F" trigger values. Soils will be remediated until the remaining insitu soils achieve HIL 'F' industrial landuse criteria to a depth of 3 meters below the final fill levels.

In addition, the acid forming potential of the soils are currently resulting in impact on the groundwater in the superficial aquifer. The acid generating capacity of the soils on the site is related to the amount of both sulphide and calcareous minerals present. CSBP has previously considered the potential for the exposure of pyritic cinders during water remediation activities to result in increased oxidation, chemical solubility and contaminant mobilisation and for a 'slug' or pulse of groundwater contaminants to occur. Accordingly, CSBP has installed a lime dosing plant to remove heavy metals from groundwater abstracted via thirty-three interception bores which lie across the south-west corner of the site (already approved under Part IV of the *Environmental Protection Act 1986*). CSBP has been undertaking performance monitoring and adjustments to the dosing regime during the commissioning period to optimise the operational, mechanical and chemical performance of the plant. The plant became operational in October 2004 and has been effective by neutralising the pH of the acidic groundwater and precipitating in excess of 73% of F and 96% of Al and Zn (the principal contaminants of concern identified for the Swan River ecosystem within the PER). The groundwater interception and treatment of the groundwater is part of CSBP's broader remediation strategy and will continue throughout during the remediation.

Once successfully remediated, the 37 hectare site is to be developed as an industrial/commercial estate and will meet the human health and environmental regulatory standards for this end-landuse.

The volumes of soil to be excavated during the soil remediation phase was estimated in the PER and has been updated to the current state of knowledge in *Table 1.2*

Table 1.2: Estimated Remediation Soil Volumes

Potential Scenario	Preliminary Estimate	
	Volume (m³)	Weight (tonnes)
Metal Concentration exceeding HIL "F" guidelines for commercial/industrial land	20,000 – 30,000	40,000-60,000
Metals Concentration exceeding EIL guidelines ¹ including aluminium >20,000 mg/kg	182,120	295,000
Iron oxide concentration exceeds 25%	76,300	123,600

1. The EIL estimate excludes arsenic, which is distributed across the site but has not historically been detected at toxic levels in the Bayswater Main Drain.

Note: HIL = Health Investigation Level; EIL = Ecological Investigation Levels

Source: Final Remediation Works for the Former Cresco Site, Bayswater — Public Environmental Review, September 2004

1.3 Remediation Strategy

The contaminated soil at the site to be removed meets the requirements for disposal as either Class III or Class IV landfill (Parsons Brinckerhoff 2004). Selective mining with excavators will be used to remove the material for direct loading into trucks and transport off-site to the landfills. The excavator may create small short-term stockpiles for the immediate loading into the trucks by a front end loader but no long-term (>1day) stockpiles of contaminated material will be created. Validation samples will be taken of any area which is used to place contaminated material (of any duration) prior to removal from site.

The site has been artificially contoured as a result of construction, waste disposal and drainage activities on the site over many years and the removal of contaminated material will further modify the levels of the site. It has been proposed that clean fill be imported, placed and compacted to appropriate engineering standards to ensure that the final site contours are suitable for the intended future industrial/commercial land uses.

The main areas of active remediation are located in the western portion of the site which is relatively flat laying, is internally drained with relatively high porosity. As such, stormwater falling on the site in the vicinity of excavation areas is expected to directly infiltrate and have limited potential to generate runoff. Therefore stormwater diversion techniques are not expected to be required during soil remediation works.

Remediation of the site will be conducted in relatively small discrete excavations thus decreasing the disturbance of the existing site contours and further reducing the potential for run-off of stormwater.

The Ground and Surface Water Monitoring and Reporting Program is designed to monitor the potential contaminant mobilisation and movement in the groundwater as a result of soil disturbing activities. Surveillance monitoring of on-site groundwater quality will therefore be undertaken to detect the onset of this impact and to gauge the effectiveness of groundwater interception and treatment during and following remediation of the site.

The success of this remediation project will be based on three central propositions:

1. The surface soils remaining on the site will, as a minimum, meet the standards of the ANZECC HIL "F" trigger values for industrial / commercial landuse to a depth of 3 meters below the final fill levels.
2. The groundwater under the site will be improved by the removal of contaminated material, the pumping and treating of contaminated groundwater during remediation, and the continuation of the groundwater treatment after the soil excavation to ensure the groundwater exiting the site is of similar quality when it reaches the BMD as the existing BMD background water quality.
3. The future land uses on the site will be legally constrained from accessing the groundwater under the site for irrigation (i.e. moratorium).

2. Waste Management

An initial cleanup of the site has already been undertaken through the removal of non-essential buildings and infrastructure. The metals have been recycled and concrete / waste materials disposed at landfill.

The remaining buildings may be used for storage of equipment during the remediation activities. The final removal of buildings will occur after the soil remediation phase has been completed.

The soil remediation activities are planned from November 2005 for a period of approximately 6 months. The demolition of the remaining buildings will commence after the soil remediation activities have been completed.

2.1 Preliminary Waste Inventory

The primary source of waste from the former Cresco site is the contaminated soil. Buildings and associated infrastructure will also need to be removed.

A preliminary waste inventory is listed in *Appendix A*. The volumes of waste have been calculated from dimensions scaled from an aerial photograph (*Figure 2.4 Vegetation units on the former Cresco site*, Public Environmental Review) and from visual site inspections. These calculations are not considered to be definitive, however, provide a good indication of the scale of the remediation project. This Waste Management Plan will be updated with additional details as they become available.

CSBP has undertaken the chemical and leachate testing required for waste classification prior to disposal at landfill. The Red Hill Waste Management Facility has the capacity to accept the HIL 'F' contaminated soil from the former Cresco site. These contaminated soils would be placed in the existing Class 3 and Class 4 waste cells. Although a number of landfill facilities in the metropolitan region have been identified as suitable for accepting the Class 3 wastes and other lower grades of wastes (e.g. general building rubble, concrete), the specific landfill facility is yet to be decided for general building waste materials. This is phase 2 of the remediation and will be finalised when demolition contracts are awarded for this part of the remediation. The Waste Management Plan will be updated prior to this phase commencing.

Recycling of metal and timber from the building demolition will be administered where possible.

2.2 Waste Tracking

All waste materials that are exported offsite will be tracked through the following methods:

- Completing a preliminary waste inventory for all wastes on the former Cresco site;
- Records of total volumes and mass of waste sent offsite including truck weighing bridges and random visual truck inspections; and

- Records of the different classification wastes leaving the sites via waste tracking forms and landfill acceptance records as required by law. All records will be collated regularly and details reported to the Site Auditor on a monthly basis.

2.3 Lime Sludge

The lime sludge has been analysed for total and leachable metals and satisfies the criteria for disposal to a Class IV landfill. The quantity of lime sludge produced by the lime dosing plant is estimated at 100 tonnes per year. Approximately 50 tonnes of this material will be removed to the Red Hill landfill from site every 6 months.

2.4 Asbestos Handling Procedures

Asbestos containing material will be removed from the site during demolition of buildings and other infrastructure. An asbestos removal licence is required in Western Australia for the removal or encapsulation of installed thermal or acoustic insulation that contains asbestos. All asbestos removal work will be conducted by qualified asbestos removal contractors in accordance with Worksafe and CSBP's standards and procedures. Monitoring for asbestos in air will also be undertaken during the demolition works in accordance with the Dust Management Plan.

Asbestos containing material can be safely removed without risk to workers or the public provided the following safe work procedures are followed:

- When asbestos containing material are being removed, signs and barriers must be erected to warn of the danger and to prevent unauthorised people entering (an example is shown in *Figure 2.1*);



Figure 2.1: Example of Asbestos Hazard Sign

- All people in the asbestos removal area must wear disposable coveralls and either a class P1 or P2 disposable mask;
- Asbestos containing sheets must be sprayed with PVA (polyvinyl acetate) solution or kept wet with water during removal. Care must be taken on roofs because asbestos containing sheets are brittle and slippery when wet;
- Non-powered hand tools or portable power tools incorporating dust suppression or dust extraction attachments designed to collect asbestos fibres **MUST** be used;

- Asbestos containing material must be removed with minimal breakage, and lowered to the ground, not dropped;
- Removed sheets are to be stacked on polyethylene sheeting, then wrapped and sealed into bundles for disposal, or placed directly into disposable bins lined with polyethylene sheeting and sealed for disposal;
- Sheets must not be left lying about the site where they may be further broken or crushed by machinery or site traffic;
- When removed sheets have been stacked, care must be taken not to skid one sheet over another, as this will result in the release of fibres;
- Roof gutters must be cleaned or sealed prior to their removal;
- Any asbestos containing visible residue remaining in the roof space or within the removal area is to be cleaned up, using an approved vacuum cleaner if necessary;
- All waste containing asbestos is to be kept wet, wrapped in polyethylene or otherwise sealed and removed from the site as soon as is practicable; and
- Used disposable coveralls and masks are to be placed in bags for removal with other asbestos waste.

Testing/sampling of waste materials from demolished/dismantled buildings may be required to ensure that asbestos is not mishandled due to lack of identification.

As with any demolition site, additional occupational health and safety procedures will need to be adopted. The remediation contractor will be required to prepare a site safety plan and provide daily site safety inductions. An Asbestos Removal Control Plan is also required to be prepared by the contractor and supplied to, and approved by the City of Bayswater prior to commencing asbestos removal activities.

Particular attention to safety is required when removing asbestos sheeting from the roof of Bin 1 due to the height of the roof and risk of fatality from falling.

2.5 Proposed Waste Management Procedures

Additional management procedures that will be implemented and documented are shown below:

- Waste management training as part of the site induction program, ensuring contractors and site visitors are aware of the materials on site (in particular any hazardous wastes);
- Track the quantities of materials reused and disposed using waste tracking sheets and receipts that will be furnished by the trucking contractors as proof of the volumes removed from site (all records will be collated weekly attached in Appendix B);
- Include the relevant WorkSafe WA and Department of Environment personnel on the site emergency contact list (for contact in the unlikely event of an accident); and
- Employ a security company to monitor the site during the evenings.

To avoid uncontrolled transportation of contaminated material off-site via vehicles, CSBP have proposed the following procedures:

- Inspecting trucks periodically prior to leaving site to ensuring wheels and undercarriage are clean; and
- Daily inspections by the site supervisor of the entrance/exit from site and the roadway leaving the site (particularly Railway Parade).

CSBP Limited will implement contingency procedures if some material is found to be trafficked on to the road. They include:

- Installation of ripple bars; and
- Wheel wash down area.

The trucks are utilising purpose built limestone roads to access the individual excavation sites. This should limit the amount of material that comes into contact with the wheels of the trucks. Notwithstanding this, ripple bars will be installed as a matter of course to ensure that any materia that may get hung up in the wheel and wheel arches of the trucks is dislodged prior to exiting onto Railway Parade. The internal hardstand areas, the entry and exit ponit and the public roads used by the trucks (particularly Railway Parade, Jackson Street and Collier Road) will be inspected daily to ensure no material from site has been deposited onto the roadways.

The trucks need to travel over approximately 300 meters of internal hardstand area before they exit the site. This will give a good indication of whether material is being trafficked by the truck wheels. If this is found to be the case, a wheel wash or similar facility will be installed to manage this.

3. Community Liaison

3.1 Communication

CSBP Limited is an active community and industry member in Western Australia, with more than 90 years of involvement across the State. The company takes its responsibilities as a corporate citizen seriously and is committed to open communication. Our main stakeholders include our employees, customers, suppliers, and the local communities in which we operate. CSBP acknowledges the community's interest in our operations and is committed to open communication with our stakeholders. A Community Involvement Plan has been developed for this project to inform the community and individual stakeholders about all relevant issues related to the remediation activities. This document has been based upon the Interim Industry Guide to Community Involvement released by the DoE in December 2003.

Community consultation and notification will be conducted before excavation and other remediation activities commence. The following groups have been identified as having an interest or potential interest in the remediation of the former Cresco site:

- landowners, residents and businesses potentially affected by contamination;
- individuals potentially affected by remediation operations;
- Bayswater community;
- Bassendean community;
- relevant local governments; and
- State government regulators.

CSBP has sought comment and advice on its remedial strategy from a range of key stakeholders during this project, including:

- Department of Environment;
- Swan River Trust;
- City of Bayswater;
- Town of Bassendean;
- Eastern Metropolitan Regional Council;
- Main Roads Western Australia;
- Water Corporation;
- Department of Indigenous Affairs;
- indigenous community Aboriginal Elders and Native Title claimants; and
- individual community members through newsletters and meetings.

CSBP has used and will continue to use the following processes to communicate with target groups:

- personal contacts with property owners and neighbours;
- meetings with government stakeholders;
- public meetings with the community;
- local area letter drops;
- individual letters – informing individuals of progress and public meetings;
- community information bulletins – printed and electronic publication;
- questionnaires and comment forms;
- response to enquiries;
- specific issue information packs (fact sheets, key points about a specific issue, information on steps to take to address concerns, etc.)
- media releases;
- telephone inquiry line;
- all updates and information bulletins posted on project website at www.csbp.com.au;
- public display material; and
- other material/activities as required.

3.1.1 Signage

CSBP Limited has a sign with contact details for the site remediation co-ordinator, located immediately inside the main front gate to the site. In addition, the entrance sign displays the CSBP logo and states "Remediation Activities in Progress, For Further Information Contact the Site Coordinator on 0400 214 857, www.csbp.com.au".

6 of these signs will be placed along the Railway Parade boundary and a further 6 along the Tonkin Hwy boundary. This will provide coverage of approximately 1 sign every 150 metres. This is in addition to the current boundary signs which are spaced at 50 metre intervals and state "Remediation Activities in Progress - No Unauthorised Access"

3.2 Complaints Handling Procedure

A complaint response procedure will be implemented as part of the overall environmental management plan.

The complaint response procedure will include the following key elements:

- identify a site contact (e.g. CSBP Project Manager) to whom the community can make a written or verbal complaint;
- document all complaints as they are raised with the following details:
 - < date of complaint
 - < time of complaint
 - < name and contact details of person raising the issue
 - < details of the complaint (note time and location that the event occurred)
 - < name of person responsible for action
- assign the complaint to appropriate staff for resolution;
- investigate complaint and document actions/outcomes on the complaint record:
 - < details of actions to resolve the complaint/issue
 - < date issue resolved
- advise the person who originally made the complaint of the resolution; and
- close the record.

In response to a complaint, corrective measures (including assessment of remediation activities and operational techniques) will be implemented to assess the nature of the complaint and to minimise the likelihood of reoccurrence of the situation leading to the complaint. Timeframes for handling of complaints and provisions of response will be targeted for 7.days from the date of the lodgement of complaint. Follow up monitoring will be used to verify the adequacy of the corrective measure. Following implementation, the complainant will be notified of all action outcomes. In addition, any site works resulting in an incident will be reported to the Site Auditor and the DoE.

4. References

Blesing, N. 2004 Personal Communications (lime sludge details), 29 October 2004.

Environment Protection Authority Victoria 2004 Landfill Levy (Non-Weighbridge) 2003–2004 Annual Statement made under Section 50SB Environment Protection Act 1970, (sourced asbestos density 0.4 tonnes per cubic metre).

Jacques, J. 2004 Report of work placement, year 2004: Asbestos Management Plan on the Bayswater Site, work experience report to CSBP Ltd, June 2004.

Jones, B. 2004 Personal Communications 19 October 2004.

OneSteel Trading Pty Ltd 2003a *OneSteel Market Mills Hot Rolled and Structural Steel Products*, product catalogue, Issue 4.2, July 2003.

OneSteel Trading Pty Ltd 2003b *OneSteel Products Sheet — Sheet (Sheet & Coil>Galvanised>Galvabond>Sheet* [online: www.onesteel.com accessed 21 October 2004].

Parsons Brinckerhoff 2004 Final Remediation Works for the Former Cresco Site, Bayswater — Public Environmental Review, report for CSBP Limited, August 2004.

WorkSafe 2003 *Asbestos Removal — safe removal of building products*, Department of Consumer and Employment Protection, WA, February 2003.

Appendix A

Preliminary Waste Inventory

Table 1: Preliminary Waste Inventory

Type of Material	Estimate		Destination		
	Volume (m ³)	Weight (tonnes)	Reuse or Recycling	Disposal	Comments
Asbestos sheeting (from Bin 1 and other buildings)	1,443	577	N/A	Landfill	Meets Type 1 Special Waste landfill criteria and to be disposed of at appropriate Waste Management Facilities.
Bitumen from paved roads	11,240		N/A	Landfill	This material is likely to be categorised as Type 1 Inert Waste and will be disposed of a suitable and approved Waste Management Facilities
Miscellaneous building waste (e.g. bricks, tiles, window glass, plasterboard, electrical wiring, plumbing and piping)	2,840	2,840	N/A	Landfill	Building material is likely to be categorised as Type 1 Inert Waste and will be disposed of at and approved Waste Management Facilities.
Concrete (from buildings, foundations etc)	26,660	48,000	N/A	Landfill	Concrete is likely to be categorised as Type 1 Inert Waste and will be disposed of at and approved Waste Management Facilities.
Structural Steel (i-beams)		1,570	Recycle as scrap metal	N/A	I-beams and structural steel can be salvaged for recycling as scrap metal.
Wood (Jarrah and Karri)	85		Salvage for reuse as a building material	N/A	Minimal timber left on site. Most of the large Jarrah beams have been salvaged.
Lime sludge (from dosing plant)		500	N/A	Landfill	Sludge from the groundwater lime dosing plant can be disposed at landfill as a Class 4 waste due to high metals concentration.
Contaminated soil exceeding 'HIL F' guidelines (minimum volume to be removed)	20,000	30,000	N/A	Landfill	The Red Hill landfill facility accepts Class III and Class IV wastes and is able to receive the types and quantities of soil from the former Cresco site. Other landfill facilities have been identified as suitable for accepting Class 3 and lower grades of waste.
Contaminated soil (maximum estimate)	182,120	295,000	N/A	Landfill	The Red Hill landfill facility accepts Class III and Class IV wastes and is able to receive the types and quantities of soil from the former Cresco site. Other landfill facilities have been identified as suitable for accepting Class 3 and lower grades of waste.
Structural steel sheeting (from Bin 2 building)		111	Salvage for reuse in current form Salvaged for scrap metal	N/A	CSBP is considering relocating this building for use at its Kwinana site. If this option is not chosen, the building will be recycled as scarp metal.

Materials on site	Estimate		Destination		
	Volume (m ³)	Weight (tonnes)	Reuse or Recycling	Disposal	Comments
Steel from other structures (cranes, hoppers, conveyors etc)	N/A	N/A	Offer for reuse to local industry or recycle as scrap metal	N/A	Useable equipment may be offered to neighbouring light industrial businesses for reuse. Otherwise, the majority of the parts can be recycled as scrap.

Notes: N/A — not applicable or information not available

Asbestos: Jacques, J. 2004, Environment Protection Authority Victoria 2004

Bitumen: scaled area from aerial photograph (Parsons Brinckerhoff 2004), averaged depth to be 137.5 mm

Concrete: visual inspection of buildings, assumed 'raft' floors for all remaining buildings with foundations of 600mm and floor slab 450mm deep.

Structural steel: OneSteel Trading Pty Ltd 2003a

Steel sheeting: OneSteel Trading Pty Ltd 2003b

Contaminated soil: Parsons Brinckerhoff 2004

Iron cinders: Parsons Brinckerhoff 2004

Lime sludge: Blesing, N. 2004

Wood: visual inspection of buildings, scaled size of remaining wood beams from aerial photograph (Parsons Brinckerhoff 2004)

Miscellaneous building materials: visual inspection of buildings, scaled size of laboratory and office buildings from aerial photograph (Parsons Brinckerhoff 2004) and assumed waste as one-third of total volume.

Appendix B

Waste Tracking Documentation

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