



TRANSNET


freight rail

**ENVIRONMENT, SAFETY AND HEALTH PLAN FOR
THE REMEDIATION OF ASBESTOS CONTAMINATES
SITES: PHASE 1 (DEPOTS, YARDS, SIDINGS AND
MAINLINES)**



JUNE 2010

**RISK MANAGEMENT DEPARTMENT
ENVIRONMENTAL MANAGEMENT PORTIFOLIO**

EHS PLAN FOR ASBESTOS PHASE 1 REHABILITATION PROGRAM			
S.RB. 12/5/11/4	Issue date: June 2010	Revision date: July 2010	Revision no.: 1

REVISION 1

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1. INTRODUCTION


The main asbestos mining areas in South Africa were concentrated in the Northern Cape from Prieska northwards to Botswana. Lesser mining activities also took place near Polokwane (Penge) and at Pigg's Peak in Swaziland. The asbestos mined was then transported through the rail network to Durban, Port Elizabeth and Cape Town ports for export.

The handling of Asbestos Ores and processed Asbestos Containing Products for export market through TFR's railway transportation networks, over time resulted in the historical contamination of TFR's operational footprint around the country. At the time of contamination, there was limited knowledge regarding the handling of asbestos and associated health implications.

In response to Asbestos Regulations promulgated in terms of both the Environment Conservation Act, 73 of 1989 and the Occupational Health and Safety Act, 85 of 1993, Transnet Freight Rail then initiated the phasing out of the use of Asbestos and asbestos containing products and instituted moratorium on the transportation thereof. The late 1990's and early 2000 initiatives to rehabilitate contaminated areas were reactive in nature, focused on the cleaning of asbestos only when sighted. The cleaning activities were therefore, not sustainable as asbestos kept on resurfacing.

During the 2008/2009 financial year, Transnet Freight Rail appointed external consultants, CSS Geographical Information Specialists, to undertake a countrywide asbestos risk assessment on areas affected by the historical spillage of asbestos, and to further pronounce on the pollution liability and quantification.

The risk assessment undertaken concluded that of the 25 sites assessed, 12 were highly contaminated, 8 sites with medium contamination and only 5 sites were rated as low contamination. GIS mappings of the contaminated areas were undertaken to calculate volumes of contaminations per areas and to further pronounce on the rehabilitation methodology per site. This is to facilitate the rehabilitation process. This

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plan is intended to provide procedures to be adhered to during the rehabilitation process and to further define stakeholder responsibility.

Asbestos is an indigenous fibrous mineral that has been mined in a number of sites in Southern Africa and, because of its excellent resistance to heat, has been used for the manufacture of various products since the 1900's. Many studies have described a link between occupational exposure to various types of asbestos and lung cancer and associated diseases. Asbestos has therefore been designated as a *known human carcinogen*.


This carcinogenic activity is directly linked to the air pathway and ingestion of the fibres when swallowed and in water does not carry any associated cancer risks. Asbestos shows a slight solubility in water and the natural fibres tend to become blunted on a molecular scale thus greatly reducing the associated cancer risk. Water therefore serves as a natural route for the removal of fibres from the soil and as a mechanism to suppress the emission of fibres into the air environment.

2. PURPOSE OF THE ASBESTOS ENVIRONMENTAL, HEALTH AND SAFETY MANAGEMENT PLAN

Transnet Freight Rail recognises that asbestos is present in its operational areas, in various forms, condition and types and that an effective asbestos clean-up and management strategy is required in order to manage the risks to employees, contractors and community members. This was confirmed through a risk assessment process.

This document sets out the Transnet Freight Rail's procedures for rehabilitation of Phase 1: Country-wide Asbestos Contaminated sites. The objective of this plan is to achieve the following purpose:

- To ensure that the handling of asbestos containing products or material is in accordance with regulatory requirements.
- To minimise occupational exposures to asbestos fibres and future liabilities

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- To protect employees, tenants and the communities from contact with asbestos fibres during rehabilitation.
- To disclose to employees, contractors, tenants and the public, asbestos contaminated sites within TFR and pronounce on management of these.
- To declare identified asbestos contaminated sites as environmental covenants after clean-up.

3. OBJECTIVE OF THE PLAN

The objective of this Health, Safety and Environmental Plan is to:

- 3.1 Ensure statutory compliance with the Occupational Health and Safety Act, 1993 (Act no. 85 of 1993) and the Environment Conservation Act, 1989 (Act no. 73 of 1989) as regards the handling and disposal of asbestos.
- 3.2 Detail procedures which will ensure optimal clean-up of asbestos pollution with due concern for the safety of the public, the TFR workforce and Contractors.
- 3.3 Identify, evaluate and develop procedures to deal with all aspects of the present problem.


4. SCOPE OF THE ASBESTOS MANAGEMENT PLAN

The scope of this plan of work covers the work associated with the encapsulation, clean-up and safe disposal of asbestos waste in the identified contract areas specified, as well as the sampling and monitoring procedures required, all in accordance with the Occupational Health and Safety Act, 1993 (Act no. 85 of 1993). It applies to all risk areas covered by the Asbestos Risk Assessment undertaken.

5. LEGISLATIVE FRAMEWORK

5.1 EXTERNAL REQUIREMENTS

The primary management and the phasing out of asbestos in South Africa is regulated through both the Asbestos Regulations promulgated in terms of Section 20 of the

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Environment Conservation Act, 1989 and Regulations published in terms of the Occupational Health and Safety Act, 1993. In addition, other legislative pronouncements require management of asbestos pollution and environmental degradation.

5.1.1 Environment Conservation Act, 1989 (Act No.73 of 1989): Regulations for the prohibition of the use, Manufacturing, Import, and Export of Asbestos and Asbestos containing material.

Asbestos Regulations were promulgated in terms of Government Notice No. 878 under Section 20 of the Environment Conservation Act, 1989 (Act No. 73 of 1989).


Prohibitions:

- Schedule 2 (1) of the regulations states that no person may acquire, process or repackage asbestos; manufacture asbestos containing material, or distribute asbestos containing material.
- Schedule 2 (2) of the regulations states that no person may import asbestos or asbestos containing material into the republic or export asbestos containing material from the Republic.
- Schedule 3 states that the provisions of Schedule 2 shall not apply to persons importing asbestos or asbestos containing material which is in transit from a state outside the republic to another State outside the Republic, unless further repackaging or processing of the asbestos or asbestos containing material is performed in the republic.

5.1.2 Occupational Health and Safety Act, 1993: Asbestos Regulations, 2001

Asbestos Regulations 2001 promulgated in terms of the Occupational Health and Safety Act, 1993 applies to every employer or self employed person who carries out work at a work place that may expose any person to asbestos dust at that workplace. The regulations further make the following provisions:

- Regulation 4 states that no employer or self-employed person shall require or permit any person to work in an environment in which he or she would be exposed to asbestos in excess of the prescribed occupational exposures limit.

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- Regulations 7 to 12 require that an assessment for potential exposure, air monitoring is undertaken, medical surveillance of employees is undertaken, the respiratory zone is demarcated and that exposure to asbestos is controlled.
- Regulation 13 (1) states that an employer shall ensure that the release of asbestos dust into any environment complies with the provisions of the Atmospheric Pollution Prevention Act, 1965 (Act No. 45 of 1965), the Environment Conservation Act, 1989 (Act No.73 of 1989), the National Water Act, 1998 (Act No. 36 of 1998) and the National Environmental Management Act, 1998 (Act 107 of 1998).
- Regulations 14 (1) (a) and (b) regulate asbestos that forms part of structures of workplace, building, plant or premises. These regulations require that steps be undertaken to identify the location of asbestos in workplace areas and make and maintain a written inventory of location of asbestos.

5.1.3 National Environmental Management Act, 1998 (Act No.107 of 1998) NEMA


Chapter 2 of NEMA provides a set of principles that governs environmental management throughout the Republic and serve as the general framework within which environmental management and implementation plans must be formulated.

The principles further serve as guidelines by reference to which any organ of state must exercise any function when taking any decision in terms of this Act or any statutory provision concerning the protection of the environment;

Principle 4 (a) of NEMA Principles provides for Sustainable development

It requires the consideration of all relevant factors including the following:

- That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;
- that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;
- that waste is avoided, or where it cannot be altogether avoided, minimised and re-used or recycled where possible and otherwise disposed of in a responsible manner.

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Principle 4 (p) of NEMA (Polluter- Pay- Principle)

Advocates that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects must be paid for by those responsible for harming the environment.

Section 28 of NEMA (Duty of Care)

States that “Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or insofar as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment.”

5.1.4. Hazardous Substances Act, 1973 (Act No. 15 of 1973)

The object of the Hazardous Substances Act 15 of 1973 (“the Hazardous Substances Act”) is to provide for the control of substances which may cause injury or ill health to or death of human beings by reason of the toxic, corrosive, irritant, strongly sensitising or flammable nature or a generation of pressure thereby in certain circumstances, and for the control of certain electronic products.


5.1.5 National Water Act, 1998 (Act No. 36 of 1998)

The National Water Act 36 of 1998 also contains a range of provisions which have a bearing on waste issues:

Part 4: of the Act deals with pollution prevention and in particular the situation where pollution of water resources occurs or might occur as a result of activities on land.

Section 19. (1) of the Act states that an owner of land, a person in control of land or a person who occupies or uses the land on which any activity or process is or was performed or undertaken, or any other situation exists, which causes or has caused or likely to cause pollution of a water resource, must take all reasonable measures to prevent any such pollution from occurring, continuing or recurring.

Section 19. (2) states that measures referred to in Section 19 (1) may include measures to -

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- (a) cease, modify or control any act or process causing the pollution.
- (b) comply with every waste standards or management practice,
- (c) contain or prevent the movement of pollution,
- (d) eliminate any source of pollution and
- (e) remedy the effects of pollution.

5.1.6 National Environmental Management Waste Act, 2008 (Act No. 59 of 2008)

The act reforms the law regulating waste management in order to protect health, and the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecological sustainable environment, to provide for specific waste management measures, to provide for the control of waste management activities, to provide for the remediation of contaminated land and to provide for the national waste management system.

The Act covers a wide range of subjects that include storage, collection, transportation, treatment, re-use and recycling, processing and the disposal of waste.

5.1.7 Mine Health and Safety Act, 1993 (Act No. of 1993)


The Mine Health and Safety Act, 1997 provides for the protection of the health and safety of employees and other persons at mines and, for that purpose -

- to promote a culture of health and safety;
- to provide for the enforcement of health and safety measures;
- to provide for appropriate systems of employee, employer and State participation in health and safety matters;
- to provide for effective monitoring systems and inspections, investigations and inquiries to improve health and safety;
- to regulate employers' and employees' duties to identify hazards and eliminate, control and minimise the risk to health and safety;
- to entrench the right to refuse to work in dangerous conditions.

5.2 INTERNAL REQUIREMENTS

5.2.1 Safety, Health, Environment and Quality Policy

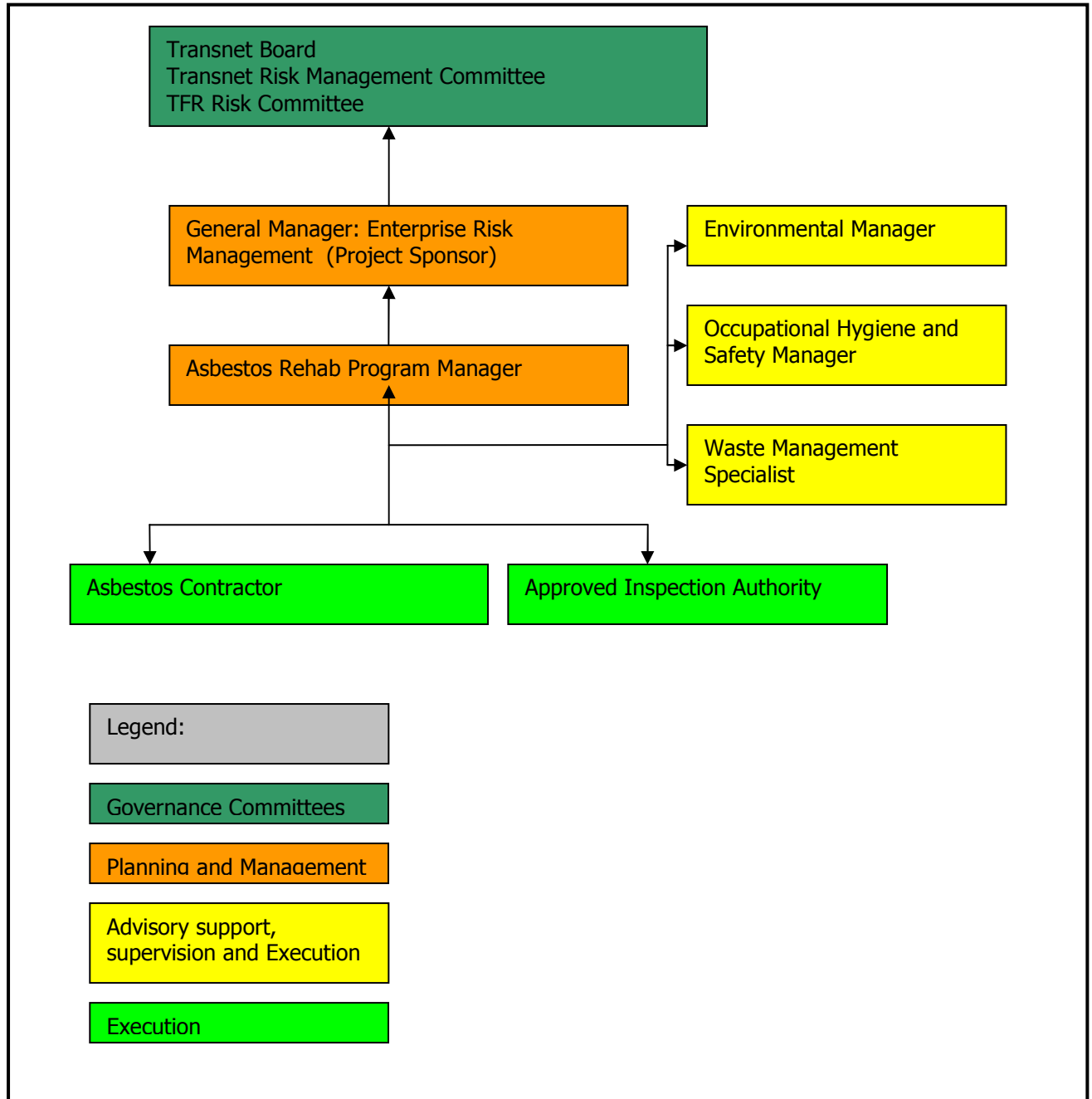
5.2.2 Transnet Ltd.: Risk Management Policy and Framework

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6. IMPLEMENTATION STRUCTURE AND REPORTING PROCEDURES DURING REHABILITATION OF ASBESTOS CONTAMINATED LAND PROPERTIES


The proposed rehabilitation of asbestos contamination is being governed through a four-tier implementation structure namely, governance, planning and management, advisory and execution. Communication, responsibilities and reporting are well defined.

6.1 Project Implementation structure



6.2 Reporting Procedure and responsibilities

- The Project Sponsor reports to Transnet Governance Structure of matters relating to progress on the Rehabilitation Program and recommend decision to be taken in case of deviations and challenges.

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- The Project Manager reports to the Project Sponsor on progress and challenges/ deviations and provide advise on required best practice during the rehabilitation process.
- Environmental Manager, Occupational Health and Safety Manager and the Waste Management Specialist advices and support the Project Manager on the execution of the rehabilitation.
- The appointed Contractor and Approved Inspection Authority shall report to the designated Project Manager and the Execution arm on progress/ challenges and potential deviations.
- The Approved Inspection Authority compiles the works plan, monitors the project implementation and ensures that compliance is achieved during removal/encapsulation and disposal. The AIA shall exercise a joint reporting function to:
 - Department of Labour in terms of the Asbestos Regulations.
 - TFR Officials (Project Manager, Environmental Manager and specialists, Occupational Health and Safety Manager in charge of the contract.
 - The contractor on matters affecting the work on site.

7. ASBESTOS RISK ASSESSMENT UNDERTAKEN, FINDINGS AND RECOMMENDATIONS

Transnet Freight Rail acquired the services of Conservation Support Services cc, an independent asbestos specialists to comply with the legislation and conduct a country-wide asbestos risk assessment. The scope of the risk assessment was to focus on historical asbestos transportation routes across operational footprint. The footprint consists of main railway lines, shunting yards, stations, depots and sidings.

7.1 Scope of asbestos risk assessment undertaken

Conservation Support Services cc was provided with an initial list of known contaminated sites, or sites rehabilitated previously as the lead and were given the following terms of reference:

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- Identification and listing of asbestos contaminated sites. Contaminated areas should include, but not be limited to the sites provided.
- Determination of asbestos types (e.g. blue fibres, asbestos ropes, etc) and quantification of asbestos amounts based on reliable scientific measurements (including drilling /auguring of sites to determine depth of pollution, sampling and analyses). Undertake environmental risk assessment to cover risks in relation to occupational health, legal and business aspects as well as the wide environment.
- Recommending appropriate/ cost-effective remedial measures and complying with all relevant statutory guidelines for the rehabilitation of impacted sites.
- Prioritisation of rehabilitation of the contaminated sites based on the risk findings.
- Making of an estimation of total financial liability for the asbestos polluted sites based on the asbestos quantities and current prices for disposal asbestos waste at the registered landfill site.
- Compilation of a Risk Assessment Technical report containing the findings, conclusions and recommendations for further investigations, or remedial action or a future monitoring programme.

7.2 Risk assessment findings and recommendations

Of the 25 asbestos contaminated sites assessed, 12 were found to be High risk, 8 Medium risk and 5 Low risk sites. The results are depicted below:

Table1. Findings of the Country-wide Risk Assessment

Province	Region	Assessment Focused Areas	Risk Results
Eastern	Western region	Port Elizabeth – Cradock-	

Cape		Noupoort - De Aar (including Evendown, Linde, Hanover, Carlton and Ou Sherbourne)	High
Free State	Western region	Bloemfontein -Kimberley line (Alex yard)	Medium
Free State	Western region	Bloemfontein loco and reverse logistics, Bloemfontein – Harrismith line	High
Free State	Western / Central	Bloemfontein – Kroonstad - Harrismith	High
Northern Cape	Western region	Kimberley – Hotazel (including Postmansburg, Hotazel and ,Lime Acres)	High
Northern Cape	Western region	Draghoender station	High
Limpopo	Central Region	Polokwane & Ladana stations	High
Northern Cape	Western region	Kimberley via McFarlane to Veertien Strome	Medium
Northern Cape	Western region	Warrenton station	Medium
Northern Cape	Western region	Lohattha Old Passesnger Coaches siding	Low
Northern Cape	Western region	Barkley West	Low
Northern Cape	Western region	Koopmansfontein siding in Kimberley	Medium
Northern Cape	Western region	Vryburg - Warrenton	Medium
Kwa-Zulu Natal	Central region	Danskraal - Harrismaith	Medium
Kwa Zulu Natal	Central region	Golale – Durban	Low

Kwa Zulu Natal	Central region	Nsese yard	Low
Mpumalanga	Eastern region	Aspiesdoring station	Medium
Mpumalanga	Eastern region	Barberton, Nelspruit and Komatipoort,	Medium
Northern Cape	Western region	Koopmansfontein siding in Kimberley	Medium
Northern Cape	Western region	Vryburg - Warrenton	Medium
Kwa-Zulu Natal	Central region	Danskraal - Harrismaith	Medium
Kwa Zulu Natal	Central region	Golale – Durban	Low
Kwa Zulu Natal	Central region	Nsese yard	Low
Mpumalanga	Eastern region	Aspiesdoring station	Medium

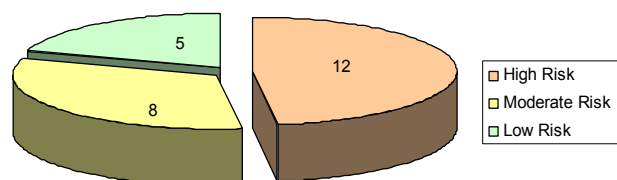



Table 2: Representation of the risk profile of Areas

7.2.2 Recommendations

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The Risk Assessment recommended following:

High Risk	That employees, contractors and the public are at high risk. Immediate rehabilitation action is required
Medium Risk	That employees, contractors and the public may be at risk at certain areas. Risk reduction strategies are recommended.
Low Risk	That employees, contractors and the public do not appear to be in immediate danger and the overall risk level is low. Additional investigation may be warranted.

8. CONTRACTOR PROCEDURES FOR THE REHABILITATION OF ASBESTOS CONTAMINATED SITES


These procedures apply to contractors to be appointed for the purpose of rehabilitating contaminated sites and shall be adhered to. The procedures shall be supplemented by the works plan to be developed by the Approved Inspection Authority. The works plan is to be submitted to the Department of Labour before clean-up commencement.

8.1 CLASSIFICATION OF CONTAMINATED SITES AND REHABILITATION METHODOLOGY

8.1.1 Rehabilitation standards of contaminated sites and the methodology to be employed shall be determined in accordance with the current land-use and the potential future land-uses. The risk factors of individual sites shall also influence the classification of individual contaminated sites.

8.1.2 Decontamination of the works and site shall continue until each pollution location has been cleaned to a standard commensurate with the risk classification of any particular area. The risk classification criteria are provided in the table below:

Pollution class	Location	Risk factors	Standard of clearing	Rehabilitation action
1	Active yards	Staff working, public access. neighbouring and residential areas	Close visual inspection reveals asbestos pollution	Encapsulate area on completion of removal
2	Inactive yards	No regular staff activity. No general access. No general residential activity.	Asbestos to be removed where no asbestos material >10mm in length is present and the number of pieces <10mm do not exceed 5m ²	Encapsulate area and cover with a 100mm thick layer of soil on completion of removal
3	Service roads	Vehicle movement	As per 1	Encapsulate area on completion of removal
4	Open lines – close to track or in immediate adjoining area	Possible disturbance by staff, infrequent	As per 2	Cover with soil and compact surface
5	Open areas in reserves not near	No staff, limited access and no residential activity	Variation of 2, depending on rehabilitation potential and	Encapsulate and cover with soil or topsoil if needed.

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	active lines		potential for future disturbance	
6	All lines, in ballast	Mechanical maintenance activities (ballast sifting)	Remove contaminated ballast up to the lowest level of the sleeper, drench all contaminated ballast lower than sleeper level with encapsulating agent	Backfill with new/uncontaminated ballast.

8.1.3 In the event of any uncertainty as to the risk classification of the particular area, a conservative approach shall be adopted and clearing shall continue until a close visual inspection confirms that there are no visible signs of asbestos spillage nor asbestos fibres at each working site or pollution site. The AIA and Transnet Freight Rail Asbestos Project Manager shall be a sole and deciding judge of risk classification of a work site.

8.2 NATURE OF WORK TO BE UNDERTAKEN

The nature of the remediation work will include the following:

- Notify the relevant authorities of the intended rehabilitation process.
- Access Control
- Undertaking of site specific risk assessment and development of contractor's Health and Safety Plan.
- Demarcate asbestos contaminated sites.
- Establishment of the base camps and decontamination facility.

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- Surface removal, Excavation, Bagging, temporary storage, loading and transportation of asbestos contaminated waste.
- Surface removal, Bagging, temporary storage, loading and transportation of asbestos contaminated waste and Encapsulation of remediated site.
- Disposal of Asbestos Waste.
- Double bagging and labelling according to Asbestos Regulations (15 and 17) of intact and semi-intact asbestos bags and removal therefore.
- Pick and disposal of asbestos residues as per Asbestos regulations.
- Protection of workers' health and use of personal protective clothing and equipment.
- Declaration and Registration of Environmental Covenant Sites.


8.2.1. Notify the relevant authorities of the intended rehabilitation process.

Departments of Labour and Water and Environmental Affairs will be notified 30 days prior to the commencement of rehabilitation process of the following:

- Risk Assessment process undertaken,
- Asbestos Remediation Program
- Environment, Health and Safety Plan
- Extent of the proposed asbestos remediation

8.2.2 Site Access Control

Every attempt will be made to prevent unauthorized site access. Barricades will be used to enclose work areas and posting of appropriate warning signs in visible locations. Key site personnel should be responsible for limiting access to the work site and only authorized personnel should be allowed on site in accordance with the project health and safety plan. All personnel should sign in and out as they enter and leave designated work areas.

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8.2.3 Undertake site specific risk assessment and develop a Health and Safety Plan.

The appointed registered asbestos contractor will conduct the risk assessment prior to commencement of the rehabilitation process with regards to the health and safety risks to which TFR employees, own employees and members of the public might be exposed.

The hazards identified and significant risk assessed will be addressed in the Health and Safety Plan as per TFR' Contractor Safety Management Procedure.


8.2.4 Demarcation of asbestos contaminated sites.

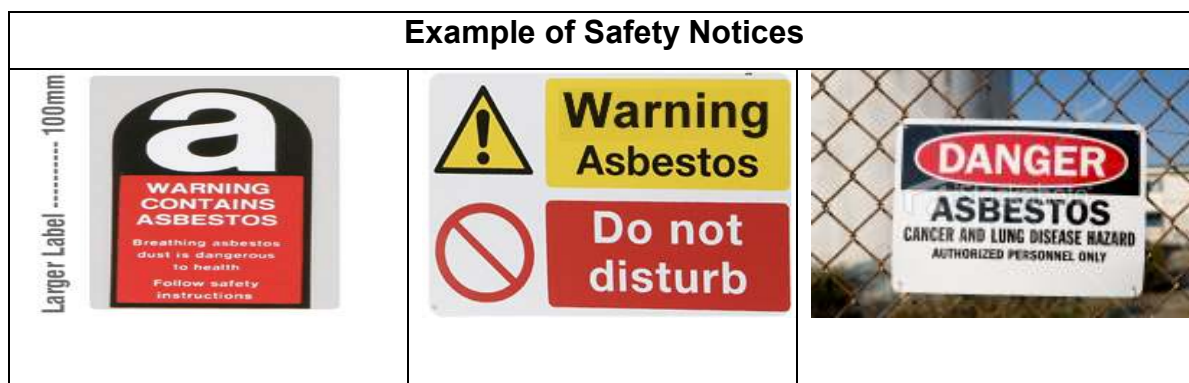
8.2.4.1 Demarcation of workplace

- Available GIS Maps and sampling co-ordinates will be utilised to identify affected areas.
- Identified areas will be inspected and marked out of bound utilising chevron tape or with suitable water resistant non-hazardous marking powder onto surface in compliance with TFR Train Working Rules.
- Where applicable will fence off the contaminated area/s and display applicable asbestos warning signs.

8.2.4.2 Safety Notices

- Mandatory warning/hazard signs that complies with the SANS Code of Practice will be displayed
- Warning signs such as the one depicted below shall be displayed prominently displayed at work sites, and points of public access where applicable. Safety warning sign would simultaneously displayed.
- Notices such as depicted below could be utilised:

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8.2.5 Establishment of the base camps and establishment of decontamination facility

Base camps will be installed near contamination sites and shall be of movable nature to ensure that it will be placed upwind of the work being carried out, thus minimizing any chance of dust contamination caused by disturbance of asbestos fibre during the work process. Positioning of the base camp where work is taking place, must consider the wind direction.

Base camps shall be constructed outside the area earmarked for remediation.

The base camp shall at least be equipped with the following:

- A first aid facility with a trained person with a valid first aid certificate issued by an approved organisation shall be in attendance at all time.
- A decontamination facility/procedure inspected and approved by an Approved Inspection Authority.
- Ablution and eating facilities that complies with the Facility Regulations.
- Emergency Procedures
- Health and Safety File as per TFR Contractor Safety Management Procedure.

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8.2.6 Surface removal, Excavation, Bagging, temporary storage, loading and transportation of asbestos contaminated waste.


8.2.6.1 Surface Removal

The following minimum requirement shall be complied with during surface removal of asbestos contaminated waste from site:

- Before commencement of clearing, the asbestos contaminated site shall be sprayed with water to suppress the release of fibres.
- Stockpiled asbestos waste shall be continuously sprayed with a mist of water so as to effectively reduce and control the release of fibres.
- Damp asbestos should be manually lifted by the use of shovels, forks, or by hand and placed into 200 micro-plastic bags (double bagged and labelled) as per Asbestos Regulations. Bags shall be of a size large enough to accommodate semi-intact bales without having to break them up where applicable.
- Intact bales (without bags) may be suitably punctured to promote water uptake.
- Where asbestos has spilled over the sides of embankments or cuttings this shall be removed, bagged and appropriately disposed of.
- Clearing of asbestos at any site shall be completed entirely before moving onto a new working site as per asbestos regulations.
- Any remaining fibres or contaminated ballast or other material remaining shall be manually lifted and disposed of as per Asbestos Regulations.
- Cleaned areas should then be marked of with a green paint over the existing red paint marks, to ensure that no spill areas are missed.

8.2.6.2 Excavation

The following minimum requirement shall be complied with during the excavation of asbestos contaminated waste from site:

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- Asbestos contaminated sites shall be excavated as per the scope of work to be provided by TFR Project Manager. The depth of underlain contamination differs from site to site and within individual sites as per the risk assessment report.
- Before commencement of excavation, the asbestos contaminated site shall be sprayed with water to suppress the release of fibres.
- Stockpiled excavated asbestos waste shall be continuously sprayed with a mist of water so as to effectively reduce and control the release of fibres.
- Cleaned areas should then be marked of with a green paint over the existing red paint marks, to ensure that no spill areas are missed.

8.2.6.3 Bagging

- Where applicable, intact or semi intact bags or bales should be picked up, double bagged and labelled for immediate disposal, to prevent further spread of the spillage.
- Bags available on site shall be large enough to accommodate the intact or semi intact bales thereby avoiding unnecessary breaking up of bales to fit into smaller bags.
- Encapsulated or damp asbestos shall be placed into 200 micro-plastic bags (double bagged and labelled) as per Asbestos Regulations. Bags shall be of a size large enough to accommodate semi-intact bales without having to break them up where applicable.
- A dedicated and demarcated temporary storage area for bags shall be provided within the remediation site.

8.2.6.4 Temporary storage

- Temporary storage of waste shall be in accordance with the requirements of the NEM: Waste Act, No 59 of 2008.
- The area earmarked for stockpiling of excavated material shall be lined with impermeable material.

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8.2.6.4 Handling and Transportation

- The handling and transportation of Asbestos contaminated waste shall be in accordance with SANS code 10228 and 10229 and Asbestos Regulations.

8.2.6.5 Disposal


- Disposal of asbestos waste shall be at a licensed disposal site specifically designated for this purpose and in accordance with the requirements of NEM: Waste Act, No 59 of 2008 and Asbestos Regulations.
- Asbestos Contractor shall furnish TFR with a safe disposal certificate as issued by the management of the Licensed Waste Disposal site.

8.2.6.6 Encapsulation

- Encapsulation will ensure that asbestos fibres are not emitted from sites.
- The same quantity of fill material will be used to replace the vacuum left by the excavation of contaminated material.
- All affected areas with a high social or worker risk (other than the clean up workers) shall be encapsulated with an approved encapsulating agent that is capable of providing long term binding of asbestos fibres.
- This product shall be non-biodegradable and penetration of product into the asbestos substrate shall be approximately 2 to 3 millimetres.

8.2.6.7 Procedure for the rehabilitation of asbestos sites within rail lines

- If in the case of pollution within the tract area the asbestos has moved to such depth through ballast that further removal of the asbestos contaminated ballast surrounding the rails and sleepers would result in the instability of rails or

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sleepers, thereby constituting a safety risk; then the remaining contaminated ballast shall be flooded with an encapsulating agent so as to bind all of the asbestos on and around the ballast.


- Remediation of asbestos contamination within rail lines shall be done in consultation with TFR Infrastructure Maintenance.
- In areas where contaminated ballast had been removed, it must be replaced in consultation with Transnet Freight Rail.

8.3 PROTECTIVE CLOTHING AND EQUIPMENT

All employees involved with the asbestos remediation process will be issued with personal protective equipment as determined by the risk assessment and not limited to the following:

- An uncontaminated disposable overall will be issued each day, or more frequently if the overall is damaged during the working day. Used overall will be disposed of at a disposal site as per requirements of the Asbestos Regulations.
- An asbestos dust mask of type FF2/FFP2 or equivalent will be issued to each person on site daily and will be replaced if any sign of damage noted. These masks will be disposed of in the same manner as asbestos waste.
- Each person who comes into contact with asbestos on site will be issued with a new pair of latex disposable gloves and will be replaced if any sign of damage noted. These gloves will be disposed of in the same manner as asbestos waste.
- Each worker will be issued with a pair of foot protective equipment as determined by the risk assessment and these will be cleaned on a daily basis. Any water used to clean any personal protective equipment will be filtered before being allowed into a drainage system.
- Any defective or damaged personal protective equipment will be replaced immediately and such equipment will be disposed of as asbestos waste.

The AIA shall ensure that:

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- The exposed employees and members of the clean up team are wearing respirator of a type approved by the Chief Inspector – department of Labour.
- Respirators are worn at all times in the asbestos environment and clean up areas
- The clean up team is equipped with suitable protective overalls
- Members of clean up team do not take overalls home
- Disposable overalls are disposed of together with asbestos waste, and that washable overalls are cleaned only by laundry that knows the precautions necessary for handling asbestos contaminated clothing
- The decontamination facility is operated in accordance with the Asbestos Regulations
- That inspection of the decontamination facility and all other facilities on site will take place
- Any other issues that may negatively impact on health and safety are addressed.

Each asbestos worker will be provided and equipped with:

- An approved unused disposable overall
- Clean gum boots
- Clean PVC gloves
- New approved dust mask (FF2)

Examples of Asbestos Removal PPE are displayed below:

Decontamination disposable suite	Safety Goggles	Latex Disposable Gloves	Dust Mask
			


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8.4 PROCEDURE FOR THE ENCAPSULATION AND PICKING UP OF ASBESTOS WASTE

8.4.1. All affected areas with a high social or worker risk (other than the clean up workers) shall be sprayed/ covered with an approved encapsulating agent that is capable of providing long term binding of asbestos fibres. This product should be non-biodegradable and penetration of product into the asbestos substrate should be approximately 2 to 3 millimetres. High risk areas shall be sprayed as a separate process in advance of the clearing of such areas and shall take place irrespective of whether asbestos may have been previously encapsulated or not. All yards subject to the regular movement of personnel or public shall be deemed high risk areas for this purpose of this contract.

8.4.2 Asbestos fibres and as much of the contaminated substrate or subsoil as possible shall be cleared as defined in all areas, (without damaging the structural integrity of the rail track where applicable as follows:


- Before commencement of clearing, the asbestos shall be thoroughly doused with water to ensure total penetration and wetting of asbestos being worked on. During the entire clearing process, the asbestos being picked up shall be sprayed continually with a mist of water so as to effectively reduce and control worker and environmental exposure to airborne fibres. Intact bales (without bags) may be suitably punctured to promote water uptake.
- Where asbestos has spilled over the sides of embankments or cuttings this shall be removed together with contaminated soils, bagged and appropriately disposed of.
- Encapsulated or damp asbestos should be manually lifted by the use of shovels, forks or by hand and placed into 200 micro-plastic bags (double bagged and labelled) as per Asbestos Regulations. Bags shall be of a size large enough to accommodate semi-intact bales without having to break them up where applicable.

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- Any remaining fibres or contaminated ballast or other material remaining shall be manually lifted and disposed of as per Asbestos Regulations.
- If in the case of pollution within the tract area the asbestos has moved to such depth through ballast that further removal of the asbestos contaminated ballast surrounding the rails and sleepers would result in the instability of rails or sleepers, thereby constituting a safety risk; then the remaining contaminated ballast shall be flooded with an encapsulating agent so as to bind all of the asbestos on and around the ballast.
- As a final and additional measure not replacing proper clearing, encapsulating agent must be sprayed over each and every work area to ensure that any asbestos fibre that may still be present are again sealed into substrate or soil surface.
- New non-contaminated ballast should be placed to refill any areas where contaminated ballast had been removed, to be arranged by Transnet freight rail.
- Cleaned areas should then be marked of with a green paint over the existing red paint marks, to ensure that no spill areas are missed.
- Uncontaminated ballast disturbed in the clearing process shall be neatly replaced and trimmed as far as possible.

8.4.3 Clearing of asbestos at any site shall be completed entirely before moving onto a new working site.

8.4.4 Work should not commence, work in progress should not continue if the Approved Inspection Authority is of the opinion that wind velocity is too high to ensure the safe handling and removal of asbestos. The liberation of visible dust


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form the immediate asbestos work site must serve as a clear indication to stop the work as the asbestos is not wet enough or the high wind velocity causes rapid drying of the fibres. The decision to allow work to proceed must be substantiated by asbestos fibre levels being consistently below acceptable legal limit.

- 8.4.5 If the concentration of regulated asbestos fibres as measured at the perimeter of the worksite is more than or equal to 0.1 f/ml of air, all removal work shall be discontinued and not resumed until the cause of the high level has been identified and rectified. The situation shall be immediately reported to Transnet Freight Rail Project Manager and the divisional inspector of the Department of Labour.

8.5. PROCEDURE FOR COLLECTION AND DISPOSAL OF ASBESTOS CONTAMINATED WASTE

- 8.7.1 All asbestos waste shall be disposed of entirely in accordance with the provisions on the Environment Conservation Act, 1989 (Act No. 73 of 19989) and regulation 17 of the Asbestos Regulations.
- 8.7.2 Asbestos waste may only be disposed of at a waste site specifically registered for the acceptance and disposal of asbestos waste.
- 8.7.3 Asbestos temporary transit sites shall be properly demarcated and protected from unauthorised access.
- 8.7.4 All contaminated soils, ballast and other solid waste shall be double bagged, labelled and disposed of as per Asbestos Regulations.
- 8.7.5 All consumables used on site e.g. protective equipment and vacuum bags etc shall be disposed of as above.
- 8.7.6 The waste contractor and registered disposal site must be informed prior to delivery of asbestos waste to the disposal site.
- 8.7.7 The disposal site must identify and sanction each consignment prior to disposal.

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8.7.8 Disposal procedures at the registered disposal site shall be monitored to ensure that such waste is disposed of as per Asbestos Regulations.

8.7.9 Copies of certificates regarding safe disposal shall be forwarded to the Department of Labour and to Transnet Freight Rail.

8.6 MONITORING PROCEDURE

8.6.1 Air Quality Monitoring

- Approved Asbestos Inspection Authority shall be used to perform all monitoring of the projects
- Work should not commence, work in progress should not continue if the Approved Inspection Authority, are of the opinion that wind velocity is too high to ensure the safe handling and removal of asbestos. The liberation of visible dust from the immediate asbestos work site must serve as a clear indication to stop the work as the asbestos is not wet enough or the high wind velocity causes rapid drying of the fibres.
- The decision to allow work to proceed must be substantiated by asbestos fibre levels being consistently below acceptable legal limit.
- If the concentration of regulated asbestos fibres as measured at the perimeter of the worksite is more than or equal to 0.1 f/ml of air, all removal work shall be discontinued and not resumed until the cause of the high level has been identified and rectified.
- Personal sampling shall be conducted to determine exposure of individuals during remediation process.
- All monitoring procedures shall be in accordance with the Asbestos Regulations.

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- The Approved Asbestos Inspection Authority shall be on-site at all times during the rehabilitation process.
- Asbestos air sampling will be conducted on a daily basis by the Approved Inspection Authority. The results will be provided to the contractor on site daily. The consolidated air sampling report will be provided to the contractor and TFR Risk Management on weekly basis.

8.6.2 Site supervision


- The AIA shall assist the contractor on the safest way of asbestos clearing and disposal work and is responsible for overseeing implementation of the plan of work.
- The AIA has the power to make changes to the approved plan of work, provided that such changes are:
 - Positive to the health and safety workers;
 - Reasonable from a contractual and practical point of view

Any changes disputed or not meeting the above shall be decided by the Project Manager.

The AIA should have a full authority on site and will liaise fully with all persons involved with the implementation structure.

8.6.3 Reporting of results

The AIA shall supply the regional office of the Department of Labour concerned with copies of all monitoring results and inspection reports, regularly as they are issued.

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8.7 PROCEDURES FOR THE PROTECTION OF THE SURROUNDING COMMUNITIES

8.7.1 In order to protect the public from potential asbestos exposure during remediation process the following procedure shall be strictly followed by the Contractor with the guidance of the Asbestos Approved Inspection Authority and the management role of TFR Project Manager, Environmental Manager, Occupational Hygiene Manager and Waste Management Specialist:

- All the contaminated sites will be barricaded and demarcated with applicable asbestos warning signs while asbestos remedial process is being carried-out. Access to the site will be manned and strictly controlled. No member of the public will be allowed 100m closer to the works area.
- Air monitoring shall be undertaken around the sites to first determine the levels of suspended asbestos fibres.
- Dust suppression systems will be used while excavating the contaminated material.
- When there is a visible dust or winds >20 knots, any asbestos remedial process will be stopped until remedial actions has been implemented.
- All machinery involved in an asbestos remedial process will be jet-washed and tested prior to leaving site.
- Final background sampling will be conducted to establish site cleanliness.

8.7.2 Declaration of Environmental Covenant Areas.

8.7.2.1 An Environmental Covenant is an administrative device that restricts activities of tenants and contractors on sites where some asbestos contaminated soil remains in place. It restricts land-uses that involves the digging of foundations or those that might results in the exposure of asbestos to the surface.

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8.7.2.2 The purpose of Environmental Covenant is to limit potential future occupational and environmental liability for residual asbestos contaminated soil.

8.7.2.3 Areas that are to be encapsulated with asbestos still underneath, shall be declared Environmental Covenant Areas and the future management will involve the following:


- Placing of signage around the sites to notify business operators and to declare the sites as Environmental Covenant sites.
- Sites will be capped with concrete or layer of 300mm clean soil compatible with the surrounding soil type and free of alien infestation.
- No digging or excavation would be allowed in the future.
- Environmental Covenants shall be registered in accordance with the National Environmental Management: Waste Act, 2008.

9. COMPLETION OF WORK AND CLOSURE OF REHABILITATION PROCESS

9.1 Before closure and hand-over, it must be certified that that the work sites are deemed clear of asbestos as defined, prior to AIA final inspection.

9.2 Decontamination of the marshalling yards or spillage on open lines shall continue until a close visual inspection confirms that there are no signs of asbestos spillage nor asbestos fibres at each working site, and two static sample is taken at least 48 hours after the completion of the clean confirm that less than 0.1 fibres per millilitre air are present.

9.3 Clearing of asbestos at any specific location will be deemed complete only once the Approved Inspection Authority has issued a written certification to this effect.

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9.4 As a first step in the approval process, TFR Environmental Manager must ensure that the Clean-up terms of reference have been met by both the contractor and the Approved Inspection Authority.

9.5 In all instances, completion of work and clearing of asbestos shall be deemed to have occurred only when random sampling within 48 hours by the AIA at cleared sites shall confirm that no worksite is capable of releasing fibres contrary to the legal of 0.1 fibres per ml of air.


10. MEDICAL SURVEILLANCE

10.1 All personnel involved with the asbestos remediation process will be subjected to medical surveillance as per the Transnet Freight Rail's Medical Code Of Practice as well as compliance to the requirements of the Asbestos Regulations under the Occupational Health and Safety Act, Act 85 of 1993.

10.2 Where contractors will be utilised, copies of medical certificate of fitness will be kept in their Health and Safety file at all times and copies for Transnet Freight Rail's employees will be kept in Transnet Freight Rail's Clinics.

10.3 A medical health baseline examination, including x-rays and lung function testing shall be done prior to personnel exposure and thereafter as contemplated in section 8 (2)(D) of the Occupational health and safety Act, 1993 (act No. 85 of 1993).

10.4 Any person with a pre-testing condition relating to asbestos or any other medical condition or is unstable to work with a respirator and in the opinion of the Occupational Health practitioner is unable to work with a respirator, may not be employed in asbestos related work.

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10.5 Medical surveillance as well as exposure records shall be kept in accordance with regulations 8 of the Asbestos Regulations for a period of 50 years. Such record shall be kept and maintained by the contractor and TFR.

11. LIAISON MEETINGS

A meeting will be held weekly and will be attended by TFR Management, AIA and the contractor to discuss issues pertaining to the contractor and site working.

12. DOCUMENTATION

12.1 All certificates, reports, letters and approvals from the relevant authorities and in terms of occupational Health and safety Act, 1993 (Act No. 85 of 1993), exposure records excluded) must be safeguarded by the contractor for at least 3 years.


12.2 All site diaries, site instructions, waste disposal certificates and other contractor documents shall be retained for at least 3 year for audit and control purposes.

13. EDUCATION AND TRAINING

13.1 Before commencement of any duties on site, all employees shall be given adequate and comprehensive training on both practical aspects and theoretical knowledge, as outlined in the asbestos regulations (GNR.155 of 10 February 2002).

13.2 All employees tasked to work with asbestos and clean up personnel shall be given full training and instructions on the dangers and safe handling of asbestos before permitted to work on site.

13.3 All personnel shall be given training in the basic train working procedures applicable to each site.

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- 13.4 Personnel shall be instructed with regard to the procedures for encapsulating, picking and disposal of asbestos.
- 13.5 Personnel shall be instructed on practical identification of asbestos.
- 13.6 Personnel shall be instructed on the procedures to be followed regarding movement from work to decontamination area.
- 13.7 Personnel shall be trained in the use and limitations of personal protective equipment.
- 13.8 Personnel shall be instructed on appropriate handling and disposal of all waste streams on site, as these may have an effect on the handling and disposal of asbestos waste. These shall include proper labelling of different waste streams. Asbestos mixed with any other waste shall be considered as asbestos waste and shall therefore be handled and disposed as such.

14. CONCLUSION

The above procedures apply to all the asbestos removal works specified. It is intended to be used as a framework and neither supersede the requirements of the asbestos legislation nor the instruction to be issued by the Approved Inspection Authority during rehabilitation. It is solely directed to enhance compliance during the rehabilitation of sites assessed and quantified.