



INSITE REMEDIATION SERVICES PTY LTD

SITE SPECIFIC

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Project:

URBN SURF Sydney

Prepared for:

URBN SURF (SYDNEY) Pty Ltd - (USS)

Project Construction Environmental Management Plan (CEMP) version control and revision status.

Version	Date	Author	Change Description
V01	13-03-17	Tim Dick	

This Construction Environmental Management Plan must be site specific.

The Project Manager must ensure this plan is written to meet the needs and conditions of the client/contract and any relevant legislation for the State or Territory to which it is intended.

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PROJECT CONTACTS & SITE WORK HOURS

Site Specific Details	
InSite General Manager	Phone #: Greg Dick – 0488 090 242
InSite Operations Manager	Phone #: Paul Cheadle – 0400 502 483
InSite Project Manager	Phone #: Tim Dick – 0408 123 678
InSite Project Supervisor	Phone #: Terry Rodgers – 0438 754 114
Client Project Manager - contact	Ben McCarthy – 0403 308 099
Site Contact / representative:	TBC
Site Specific Address:	Cnr Hill Road and Holker Busway, Sydney Olympic Park
Work Site Access:	Via Holker Street Busway
Work Operations	
Project Start Date:	TBC
Duration of Work:	TBC
Work Hrs Mon-Fri:	7:00am to 5:00pm
Work Hrs Sat:	8:00am to 1:00pm

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1 MANAGEMENT DECLARATION

I have read and understand this Project Site Specific Construction Environmental Management Plan, including: (To be signed on the last page of this CEMP):

- Project and site specific details and contacts.
- The Contract
- Environmental and other Hazards associated with this project.
- Emergency Evacuation Procedures
- Company's Policies and procedures.

Date:	Name	Position:	Signature:
Date:	Tim Dick	InSite Project Manager	
Date:	Paul Cheadle	InSite Operations Manager	
Date:	Ben McCarthy	Client Project Manager	

Distribution of Controlled Copies of CEMP

Copy No.	Issued to:	Company / Position	Date Issued:
1	Ben McCarthy	URBN SURF / PM	14-03-17
2			
3			

1.1 Project Description

Details	
Project description:	Urbnsurf Sydney, Cnr of Hill Road and Holker Busway, Sydney Olympic Park NSW 2127
Client's Name:	URBN SURF (Sydney) Pty Ltd
Contract Job Number:	N/A
Phone / Fax Number:	0403 308 099 / 08 6323 1116
Email:	bmccarthy@waveparkgroup.com

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2 Introduction

2.1 Introduction

InSite Remediation Services (InSite) is pleased to provide this Construction Environmental Management Plan (CEMP) to Urbn Surf (Sydney) Pty Ltd for the environmental management of asbestos impacted soils during the construction and development works associated with the proposed Urbn Surf (Sydney) Pty Ltd site.

The CEMP provides supplementary information in support of WSPs Environmental Site Investigation, WSP, 22nd August 2016, which should be read in conjunction with this CEMP.

This CEMP documents how InSite's Environmental Management System (within our more comprehensive Integrated Management System) and procedures will be employed to manage any potential environmental Impact associated with the asbestos management works.

The CEMP has been prepared in accordance with ISO 14,001 and covers all personnel and subcontractors working on the site. The CEMP shall be monitored for regular compliance to any applicable State or Territory legislation regarding the works.

2.2 Background/ Site History

A summary of the site history is presented in the table below:

Site History and Stage 1 Works
<p>Historically Sydney Olympic Park was subject to uncontrolled tipping of power station ash, demolition waste and other waste from the late 1950s until the late 1980s. Containment works were undertaken in the 1990s and, although the site has been subject to filling, the site is not located within one of these containment cells.</p> <p>Asbestos was identified above the adopted criteria (of no asbestos detected) in soil samples obtained from locations BH01, BH02, A7, B8, E2, F6 and D7 at depths between 1 mBGL and 3 mBGL. Asbestos identified comprised small fragments of bonded asbestos sheeting, friable asbestos fibreboard and fibre bundles.</p> <p>The confluence of asbestos detections and presence of foreign material in the soil indicate that during historical filling of the site some imported or reused material containing a variety of foreign material including asbestos waste was placed in some areas of the site, principally in the northern corner but in other localised areas as well.</p> <p>The asbestos-impacted material represents a potential risk to construction workers during the proposed redevelopment work at the site, as well as a potential risk to nearby site users or passers-by in the event of dust generation during excavation or construction work.</p> <p style="text-align: right;">- Source – WSP Environmental Site Investigation, Aug 2016</p>

A copy of the site layout plan is included in Appendix B.

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2.3 Objective and Scope

The objective of this CEMP is to provide a framework for the management of works in order to reduce adverse impacts on the environment and in particular;

- to ensure that works are carried out in accordance with appropriate environmental statutory requirements,
- to ensure that works are carried out in such a way to minimize environmental risk;
- ensure that all personnel engaged in works comply with the CEMP;
- to ensure that no changes are made to the CEMP without the written permission of the InSite Project Manager / Urbn Surf (Sydney Pty Ltd) or their representative; and
- to respond to changes in environmental conditions during the works through review, monitoring and control programs with the Project Manager, or their representative, to ensure that corrective actions are completed in a timely manner

InSite Remediation Services Pty Ltd (InSite) is committed to operating within the framework of sustainable development with no adverse impact to the environment. InSite acknowledges the fundamental requirements for the management, monitoring and maintenance of environmental controls and policies so as to minimise the potential for environmental impacts and risks. InSite adheres to the principles of Ecologically Sustainable Development as stated in the NSW Protection of the Environment Operations Act, 1997.

The scope of this CEMP is to manage identified potential environmental risks by setting clear guidelines on appropriate control measures for specific site activities. It also provides a means to include future environmental aspects as part of a continuous development / improvement of environmental management procedures. As a minimum, InSite will work to the requirements of the NSW Governments Environmental Management System Guidelines Edition 2, (September 2009).

2.4 Environmental Management Plan Development

This CEMP was developed referencing the following Acts, Codes and documents;

- Request for Tender received by InSite Remediation on 2nd March, 2017
- WSP Environmental Site Investigation (Project No: 2270060A-CLM-REP-001 Rev B) dated 22nd of August 2016.
- NSW Government Environmental Management Systems Guidelines Edition 2, (Sept 2009)
- Protection of the Environment Operations Act 1997 (POEO Act)
- Contaminated Land Management Act 1997; Amended 2008
- Environmental Planning and Assessment Act, 1997 (State Environmental Planning Policy N 55 – Remediation of Land)
- Environmentally Hazardous Chemicals Act, 1985
- Work Health and Safety Act 2011

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- AS/NZS ISO 14001:1996 Environmental Management Systems – Specification with guidance for use
- AS/NZS ISO 14004:1996 Environmental Management Systems – General Guidelines on principles, systems and supporting techniques
- “Managing Urban Storm water” – Soils and Construction 4PthP edition - (Landcom) March 2004.
- NSW EPA (1999 as revised 2004) Environmental Guidelines for the assessment and management of liquid and non-liquid wastes.
- ANZECC (2000) Australian and New Zealand Guidelines for Fresh & Marine Water Quality.
- Pollution Control Manual for Urban Storm water.

2.5 Project Activities

The proposed works will include:

- Development of preliminary documentation and notification to regulatory authority (Sydney Olympic Park Authority SOPA, and NSW EPA Accredited Site Auditor)
- Mobilisation of personnel, plant and equipment to site
- Establishment of amenities and asbestos exclusion zone and asbestos works area on site by licenced asbestos removalist (InSite holds a current Class A removal licence). Establishment of other dust and migration control measures prior to commencing excavation works
- The preliminary earthworks strategy has been designed minimise disturbance and assumes all potentially impacted soil will be retained on site.
- Supervision and visual identification of potentially asbestos affected soils using olfactory methods in conjunction with analytical sampling. As per the WSP site investigation, potentially affected soils were consistent with a darker more organic soil.
- Soils of this nature, where required to be cut as part of the bulk earthworks will be segregated for testing in stockpiles no larger than 100m³.
- Stockpiles that are “non-detect” for asbestos containing materials will be suitable for reuse around the site as needed. Stockpiles in which asbestos is identified will be demarcated and isolated for consolidation into areas identified for filling as part of the detailed earthworks design.
- Excavation of these areas will be undertaken by contractor as directed by environmental consultant.
- Covering of the asbestos impacted soil with A120 Geofabric delineation layer and capping on top of the geofabric of 300mm of clean sourced backfill i.e. clean quarry material or re-use materials won from Virgin Excavated Natural Material (VENM) from another construction site.
- Surveying of the capped areas for input into site Asbestos Management Plan (AMP)
- Asbestos Management Plan (AMP) to be developed by Environmental Consultant and implemented by site owner post-works. This asbestos management plan is to be provided to and implemented by any future owner of the site as long as asbestos containing materials remain on site. The AMP

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is to include the asbestos register for the site, identify the type, location and condition of any materials containing or assumed to contain asbestos, the nature of the asbestos capping works undertaken and the dates they were undertaken, clearance certificates provided by a qualified Asbestos Assessor, the risks involved with the asbestos capped on site and any other requirements within the Code of Practice – How to Manage Asbestos in the Workplace 2011.

2.6 Remediation Contractor Responsibilities

Remediation contractor responsibilities include:

- Prepare CEMP
- Implement and maintain environmental controls
- Ensure compliance with CEMP
- Induct site staff to CEMP
- Inspect and monitor controls,
- Report and address non-conformances.

2.7 CEMP Objectives

The main objectives of this CEMP are to:

- Ensure compliance with InSite Policies and Procedures
- Ensure compliance with relevant environmental legislation
- Ensure environmental risks associated with InSite activities are properly managed

The table below details how the above objectives will be achieved:

Project Objectives					
Objectives	Description	Timeframe	Achieved?		
Effective Consultation	Communicate effectively with all relevant stakeholders i.e. residents, regulatory authorities, councils government departments etc.	Prior to commencing works			
Zero Environmental complaints & Incidents	Anticipate inherent issues like odour, noise, dust etc. and mitigate prior to works commencing, effective risk management. Training	Prior to works commencing			
Where practical innovate to reduce waste outputs by recycling or reusing materials (reduce, reuse, recycle)	Retention of asbestos impacted soil on site and cap rather than dispose of impacted soil off-site	During the project			
Effective erosion control	Employ adequate erosion and sediment controls onsite to ensure sediment runoff is	Prior to and during the project			
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Project Objectives			
Objectives	Description	Timeframe	Achieved?
	minimise as much as practical.		
Comply with all Legal and regulatory requirements	Ensure all legislation and relevant codes of practice are understood and complied with throughout the project.	At all Times	

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2.8 InSite Environmental Policy



Environmental Policy Statement

InSite Remediation Services is an Australian owned business that has been established to provide professional remediation contracting and waste management services. We are committed to an organisational culture which continually pursues improvement and excellence in the environmental performance of our activities.

Our Corporate Environmental Objectives are as follows:

- Comply with environmental laws, regulations, codes, standards, and other legal and contractual requirements.
- Implement and maintain management systems, programmes and procedures to ensure the environment is protected. Environmental management performance indicators will be recorded and regularly reviewed for improvement opportunities.
- Communicate with clients and other interested parties to ensure we understand and address relevant environmental concerns.
- Prevent pollution, reduce waste, conserve resources and properly dispose of all waste products.
- Increase environmental awareness of employees and subcontractors through communication, induction and training ensuring environmental obligations are understood and met.
- Efficiently use natural resources including fuels and water, and reduce, reuse or recycle wastes.
- Utilise research and implement commercially viable technologies to manage environmental impacts and improve environmental outcomes.

Supporting this Environmental Policy is an effective Environmental Management System based on ISO14001, which is fully integrated into our Corporate Management System. All personnel are required to participate in, and contribute to, activity based plans for environmental management, awareness and improvement. Training and education where necessary to supplement managerial and vocational skills will be provided.

The attainment of these environmental goals requires strong and responsive management and a united commitment from all personnel. The outcome will be a respected Company reputation and a rewarding and responsible organisation in which to work.

Signed: 

Date: 28th January 2015

Name: Greg Dick

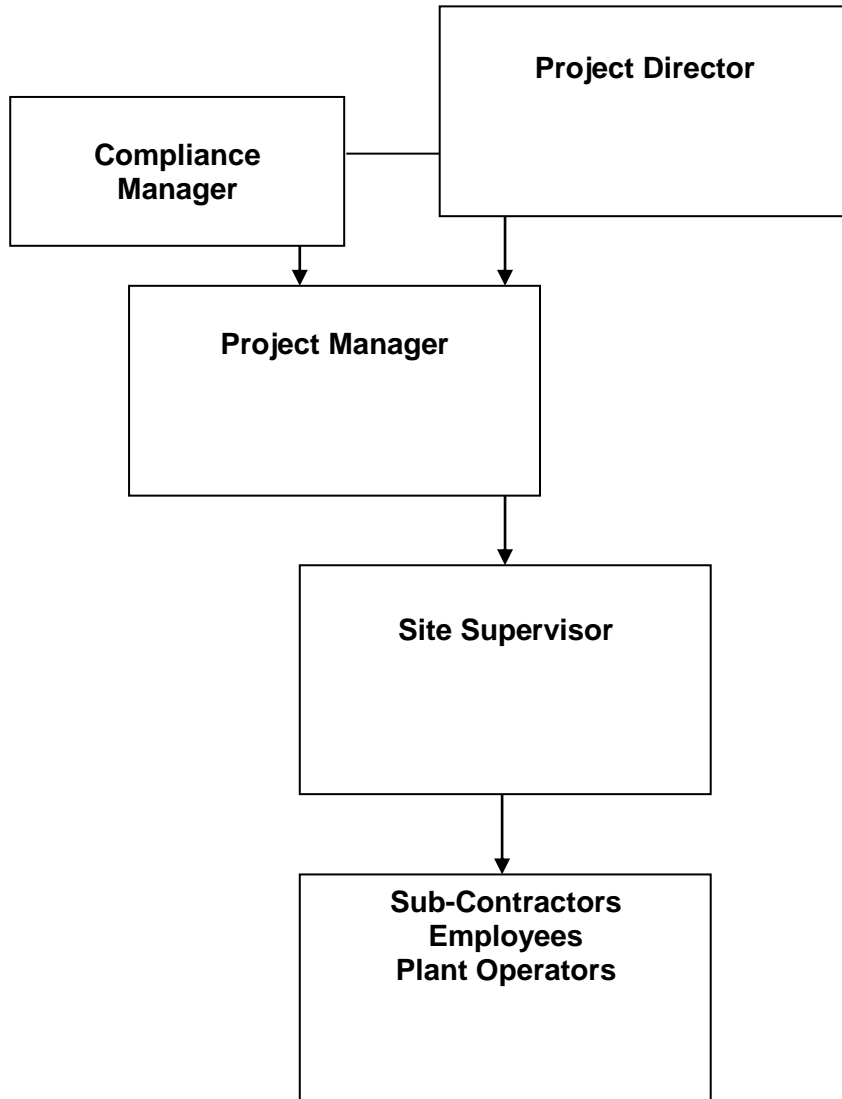
Managing Director of InSite Remediation Services Pty Ltd

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3 Environmental Management

3.1 Structure and Responsibility

3.2 Project Org chart (Project Structure)



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3.3 InSite Project Role Descriptions

General Manager

The General Manager has responsibility for the operation of the Company, inclusive of contract and management review. Responsibilities shall also be in accordance with regulatory compliance of the company for Environmental Management and continual improvement in Workplace Health and Safety (WHS) systems, Training and Industrial Management. He has to approve role descriptions and responsibilities and ensure the operation of and WH&S committee if one is required under the National WHS Regulations 2011 for the company.

Operations Manager

The Operations Manager is responsible for ensuring the project covered by this CEMP is completed in accordance with all environmental and legislative requirements. The Operations Manager reports to the General Manager. He is responsible for the necessary provision of adequate human, technical and financial resources to meet WHS and environmental issues, contract and project specifications. Responsibilities shall also include performance to ensure compliance to Quality requirements, operation within budget, management of staff and equipment, contract review, management review and liaison with consultants and all statutory and government bodies.

Senior Project Manager (PM)

The Senior Project Manager is responsible for the day-to-day operation within the projects under his control. Responsibility shall include works allocation of adequately trained and inducted personnel and equipment to meet schedules, reporting and implementing quality control at the site, reporting of compliance of WHS and Environmental procedures to the Operations Manager. He is accountable for verification and control of actual performance with the project specifications. This person is also responsible for;

- managing compliance of the Workplace Health and Safety System via Site Specific Plans on all site operations
- managing compliance to the corporate Environmental Management System via Site Specific Environmental Management Plans for all site operations
- ensuring compliance with relevant WHS legislation, regulations, standards and codes
- interaction with the Client Project Manager and Consultants on a daily basis

Project Supervisor

For this project the Project Supervisors will be on site whilst works are being conducted at all times. The Project Supervisor will conduct daily checks on environmental measures in the checklist found in Appendix D (Forms).

For the asbestos related works a competent supervisor included on InSite Asbestos Removal License will also be present.

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The Project Supervisors will report to the Project Manager on a daily basis regarding project environmental performance indicating any non-conformances or issues. The Project Supervisors are directly answerable to the Project Manager and is responsible for the placement of orders and purchasing of materials, the performance of laborers, plant operators and construction staff. This responsibility shall extend to ensuring performance of work is in accordance with procedures and the quality requirements of the project, monitoring the status of the maintenance of equipment, and ensuring only trained and inducted operator's carry out relevant tasks. This shall include the supervision of work to ensure environmental, safety and regulatory requirements are adhered to by operational personnel. Non-conformance shall be reported to the Project Manager for action. The Project Supervisors are also responsible for;

Acquiring and communicating WHS and environmental information from employees and subcontractors to the Project Manager for review planning and conducting WHS and Environmental training specific to the project, including induction and refresher training developing site specific emergency procedures and their implementation ensuring all site personnel comply with the safe working methods as detailed in the Safe Work Method Statements and Risk Assessment ensuring that the workplace environment on site will be kept safe always by quarantining unsafe work areas, materials, plant and equipment

Plant Operators, Laborers and other construction staff

This group of personnel is directly answerable to the Project Supervisors. This responsibility extends to the performance of work to the instructed Quality and within the scope of their qualifications and enterprise procedures. All work will be performed in accordance with safety, environmental and regulatory requirements.

As part of the site induction, all site personnel will be familiarised with the requirements of this CEMP. It will be the InSite Project Supervisor's responsibility to ensure that all personnel are briefed on specific environmental matters. And personnel will be required to demonstrate their understanding by signing an induction acknowledgement form.

Site induction is given to all site personnel involved in the works. The subcontractor engages in work under instruction from the InSite Project Supervisor only. There will be continuous consultation and supervision during the course of the works.

InSite has looked to team strategically with subcontractors, suppliers and professional services providers who have been selected on the basis of a proven backlog of successfully completed project work, value for money, responsive service and attitude to quality workmanship as well as quality assurance programs and demonstrated commitment to occupational health and safety.

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Reporting Structure

Project Supervisors report to Project Environmental Officer daily on environmental and general project performance.

Project Manager reports to client on a weekly basis on environmental and general project performance. Any contact with the Authorities if required will be made by the Client Project Manager.

3.4 NSW Regulatory and Legislative Requirements

There are number of Acts which currently impose pollution controls in NSW. The primary one that will be adhered to is the Protection of the Environment Operations Act, 1997 that commenced on 1 July 1999 repealing the following:

- Clean Waters Act, 1972.
- Environmental Offences and Penalties Act, 1989. (located on dropbox under Standards in the WHS QMS and EMS folder)
- Pollution Control Act, 1994.
- Noise Control Act, 1975.
- Clean Air Act, 1973.
- Elements of the Waste Minimisation and Management Act, 1995.

The Protection of the Environment Operations Act is generally the main legislation referred to when compiling this CEMP however other relevant Legislative Acts include;

Air Quality	Ozone Protection Act, 1989 (Commonwealth)
Water quality	Water Management Amendment Act 2004 Water Management Act 2000
Soil conservation	Catchment Management Act, 1989
Catchment	Coastal Protection Act, 1979
Contaminated Land	Contaminated Land Management Act, 1997
Flora and Fauna	Crown Lands Act, 1989 Native Vegetation Conservation Act, 1997 Soil Conservation Act, 1938
Pollution	Protection of the Environment Administration Act, 1991
Heritage	Australian Heritage Commission Act 1975 Aboriginal Land Rights Act, 1983 Heritage Act, 1977 Aboriginal and Torres Strait Islander Heritage Act, 1984

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Environmental Planning and Impact assessment	Environmental Planning and Assessment Act, 1979 Local Government Act, 1993 Soil Conservation Act, 1938 Land and Environment Court Act, 1979 National Parks and Wildlife Act, 1974
Hazardous Substances And Waste Management	Waste Minimisation & Management Act, 1995 Dangerous Goods Act, 1975 Biological Control Act, 1985 Road and Rail Transport Act, 1997 Pesticides Act, 1978

In addition to the above acts, all requirements of the National Workplace Health and Safety Act, 2011 and the National Workplace Health and Safety Regulations, 2011 will be complied with at all times.

- If Required Define in detail the scope of regulatory, statutory, development consent conditions or operational licence conditions that relate to the scope of the CEMP, the project or process.
- Include copy of consent requirements/licence requirements in CEMP and if approvals are required and when.
- Identify the process employed to ensure amendments to statutory or regulatory requirements potentially applicable to the project/process will be identified, evaluated and the CEMP revised accordingly.
- If relevant, identify how subcontractors will be bound by the CEMPs statutory responsibilities.

3.5 Approvals and Licencing Requirements

Any approvals or licencing relevant to this CEMP will be managed by URBN SURF (Sydney) Pty Ltd.

3.6 Reporting

Monitoring records will be maintained by InSite to monitor control performance. These will include daily inspection of site controls and continued communication between InSite supervisor and Urbn Surf (Sydney) Pty Ltd site representative to ensure prompt response to changing conditions associated with weather and climatic conditions and wind direction changes that may affect effectiveness of controls in place to mitigate dust migration from site. Example site monitoring forms are attached in Appendix D.

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3.7 Environmental Training and Inductions

This plan will identify the skills required to effectively implement the CEMP and its procedures or sub plans. Ensure the skills of relevant contractors working on the site are also included.

As a minimum everyone must be familiar with this CEMP, their roles and responsibilities detailed in it and what it requires of their job.

InSite will develop an induction training plan which explains the purpose of the CEMP and any issues to new starters, whether permanent or contractors, need to be aware of.

Identify and describe how specific operations skills training will occur, when and with which staff. Ensure all site/facility staff are aware of their responsibilities in implementing work instructions or procedures contained in the CEMP.

Ensure the CEMP clearly lists who will require training, the frequency of training, and the procedure to document training activities. Identify also to what basic level or standard training will be targeted.

The induction training as a minimum will cover the following:

- Individual responsibilities under the CEMP;
- Risk management strategies for addressing potential environmental impacts and for developing appropriate control strategies for any activity perceived to pose an environmental risk;
- Key environmental concerns and associated control strategies
- How hazardous or dangerous goods will be handled;
- Waste minimisation, recycling, and disposal guidelines;
- Incident and emergency response actions including reporting and recording guidelines;
- Complaint handling procedures

3.8 EMERGENCY PROCEDURE AND MANAGEMENT

3.9 General Emergency Procedure

In the event of an emergency the first point of contact would be the Site Supervisor and other affected workers. Once all relevant site personnel and the respective authorities have been contacted then the Project Manager will be contacted. The Project Manager or Site Supervisor will then immediately contact the Operations Manager. An incident report must be filled in for any emergency in relation to the site detailing the actions taken. For all Environmental Incidents the Operations Manager and Senior Projects Manager must be contacted.

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Position	Name	24 Hr. Phone No:
Site Supervisor:		M:
Project Manager:		M:
WHS Coordinator & Supervisor:		M:
Operations Manager		M:
Senior Projects Manager		M:
Company Director:		M:

The names and contact numbers for these people, and any relevant authorities will be given to all staff at their induction to the site. They will also be displayed in the site office and the crib room.

The Company Emergency Controller/Site Supervisor shall:

- Check that a First Aid attendant has been directed to the accident.
- Check whether ambulance, fire brigade (if necessary) has been called to the accident.
- Post a person at the gate to guide ambulance or fire brigade to accident scene.
- Undertake a head count and if necessary evacuate accident scene.

The Company will maintain a register of attendance for:

- All Company workers on site
- All workers of sub-contractors
- All visitors – via site office.

This system will account for all persons marshalled and direct emergency services to the assistance of missing persons.

3.10 Prepare Emergency Response Plan (ERP)

If necessary, prepare an ERP or response procedure detailing the actions to be taken and assigned responsibilities for response to environmental incidents and emergencies related to the implementation of this CEMP or the operations in which the CEMP relates.

The Emergency Response Plan must consider:

- (a) the nature of the work being carried out at the workplace;
- (b) the nature of the hazards at the workplace;
- (c) the size and location of the workplace;
- (d) the number and composition of the workers and other persons at the workplace.

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The Emergency Plan must nominate the frequency of testing / rehearsal of emergency procedures. Quarterly frequency is the minimum requirement. All workers and personnel within the work area must be trained in emergency procedures during induction and morning briefings.

The ERP may be a component of an existing site or facility ERP. Existing plans may be referred to in this CEMP provided the assigned responsibilities are clear between the sites designed ER Coordinator and the staff implementing the CEMP.

Nominate the 24 hour emergency contact person. Organisations storing or handling flammable or toxic material are required to have an EPR in place together with adequate staff training.

Generally issues to do with response to spills of liquid wastes should be included in whatever overall ERP is in place for the site.

Incident type	Emergency Contact	Contact Number
All incidents	Operations Manager	M:
	Senior Project Manager	M:

3.11 Pollution Incident

Pollution incident means an incident or set of circumstances during or as a consequence of which there is, has been or is likely to be a leak, spill or other escape of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which waste has been placed or disposed of on premises unlawfully, but it does not include an incident or set of circumstances involving only the emission of any noise or odour.

3.12 Emergency response

If a pollution incident does occur, all necessary action will be taken to minimise the size and any adverse effects of the release. If adequate resources are not available to contain the release and if it threatens public health, property or the environment, the Local Fire Brigade shall be contacted for emergency assistance - phone 000.

In addition, if advice is required on cleaning-up the incident or on the disposal of any resulting waste materials, Dept. of Environment & Conservation staff can be contacted 24 – hours / day via the Pollution Hotline on 131 555.

If the NSW Fire Brigades are called, they may notify the Dept. of Environment if they consider the environment or public health to be threatened. Notification by the NSW Fire Brigades does not negate the need for the InSite Environmental Management Representative to notify the Dept. of Environment & Conservation or other appropriate regulatory authority.

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3.12.1.1 Internal notification

All pollution incidents will be immediately reported to the InSite Remediation Management Representative. This person is then responsible for notifying Project Manager immediately. Should the authorities or extended parties need to be notified the InSite Group Project Manager and InSite Management Representative will do so, and in consultation with the InSite Project Manager, notify external authorities where appropriate.

All environmental incidents or potential incidents will be reported to the Environmental Management Representative with an Environmental Incident Report (Appendix D of CEMP). This person will then delegate to the Project Supervisor what mitigation measures need to be put in place.

3.12.1.2 External notification

Pollution incidents posing material harm to the environment should be notified to the InSite Project Manager and the appropriate regulatory authority. In most cases this will be the local council. However if the Dept. of Environment & Conservation licenses the activity or if a State or public authority carries on the activity, the Dept. of Environment & Conservation is the appropriate regulatory authority.

If in doubt as to who to notify, ring Dept. of Environment & Conservation Pollution Hotline 131 555

Under the Protection of the Environment Operations Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- a. the person carrying on the activity;
- b. an employee or agent carrying on the activity;
- c. an employer carrying on the activity; and
- d. the occupier of the premises where the incident occurs.

External Notification procedure will also include InSite Group and Client representative. Notification must be given as soon as practicable after the person becomes aware of the incident. Only persons engaged in the activity resulting in the pollution incident, and occupiers of the land where the incident occurs, have a duty to report the incident.

3.12.1.3 Relevant information

The relevant information about a pollution incident as required by the PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1997 - SECTION 150

- (a) the time, date, nature, duration and location of the incident,
- (b) the location of the place where pollution is occurring or is likely to occur,

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- (c) the nature, the estimated quantity or volume and the concentration of any pollutants involved,
- (d) the circumstances in which the incident occurred (including the cause of the incident, if known),
- (e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution,
- (f) other information prescribed by the regulations.

3.13 CONSULTATION & COMMUNICATION

3.14 General Communication Procedure

The objective of this section is to establish the process for sharing relevant Integrated Management System information with employees, contractors and service providers in the supply chain, providing them with the opportunity to express their views, and allocating adequate time and other resources to resolving all safety, quality and environmental issues.

InSite is committed to the principle that all workers should have the opportunity to have input into the development of strategies to manage hazards and risks in the workplace. There is a need to foster commitment by all employees to sound System Management. This commitment will be further demonstrated through the process of consultation through appropriate work groups if determined and may include Health & Safety, Quality and Environmental representatives if requested and / or required.

In line with In Site Remediation’s Consultation Statement the following provisions are requirements of the Integrated System:

- On Site weekly tool box meetings using Form IRS – F02 are run by nominated Supervisors and attended by workers to ensure a high level of consultation and allow appropriate communication of important information including WHS, Quality and Environmental issues.
- Daily Briefing Meetings Form IRS – F31 run by nominated Supervisors will also be held to enable workers to have their say on day to day matters including new hazards or environmental issues identified.

Relevant Contractors and Service Providers will be advised during site inductions run by nominated Supervisors that attendance at these meetings is mandatory. Compliance with meeting attendance shall be monitored by the Project Manager and Supervisors. Workers and service providers who fail to attend tool box meetings without adequate reason will be interviewed / counseled by the Supervisor and, if attendance does not improve, by the Project Manager continued breaches resulting in nonconformance.

Consultation with workers by all Supervisors including affected Service Providers is required before taking any decision that may adversely affect the safety or welfare of workers while they are at work the quality of their work or any environmental impact or issue that may be caused as a result.

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Consultation is required at least in the following situations:

- (a) when identifying hazards and assessing risks to health and safety arising from the work carried out or to be carried out by the business or undertaking,
- (b) When making decisions about ways to eliminate or minimize those risks,
- (c) When making decisions about the adequacy of facilities for the welfare of workers,
- (d) When proposing changes that may affect the health or safety of workers,
- (e) When making decisions about procedures for:
 - (i) Consulting with workers, or
 - (ii) Resolving work health or safety issues at the workplace, or
 - (iii) Monitoring the health of workers, or
 - (iv) Monitoring the conditions at any workplace, or
 - (v) Providing information and training for workers
- (f) When carrying out any other activity affecting the safety of workers.

Supervisors will ensure that Workers, including relevant Contractors and Service Providers, are informed of consultation options available as required by legislation. The method of consultation shall be determined through consultation between the Workers, including relevant Contractors and Service Providers at start-up Toolbox meetings and attendance at these meetings by each group is mandatory.

Relevant training on consultation as required by the legislation will be coordinated by InSite as required and included in the company induction.

The consultative arrangements will also be covered as part of the site induction process and will be displayed on site notice boards as a Consultation Statement.

The Company will discuss consultative arrangements with other persons having a duty in relation to matters under the Act and with workers who carry out work for the company who are, or are likely to be, directly affected by a matter relating to work health or safety through meetings and other communication.

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3.15 Integrated Management System Consultation Statement

COMPANY COMMITMENT (POLICY)

InSite is committed to developing and maintaining an Integrated Management System. Through the use of the Integrated Management System (includes: WHS, QMS and EMS Management Systems) InSite aims to ensure the health and safety of all its personnel, contractors and visitors to its sites as well as providing Quality outcomes that limit the impact of our work to all Environments.

Our company will consult our workers and subcontractors and other relevant stakeholders to assist in implementing best practices for these systems that will ensure the continued health, safety and welfare of our workers, subcontractors, clients, the general public and the Environment.

GENERAL CONSULTATION RESPONSIBILITIES

When an issue (i.e. Safety, Quality or Environmental) is raised either by the Company or by a worker, then feedback will be provided to workers regarding issues raised. Workers, including relevant Contractors and Service Providers, will ensure that management is aware of any concerns that workers may have. Line management will ensure that these concerns are investigated and discussed with relevant workers to obtain a satisfactory resolution.

CONSULTATIVE ARRANGEMENTS

The Company has discussed consultative arrangements with other persons having a duty in relation to matters under the Act and with workers who carry out work for the business or undertaking who are, or are likely to be, directly affected by a matter relating to work health or safety by meetings and communication and it was established that workers wish to undertake consultative arrangements through:

- Regular Toolbox meetings with workers as appropriate (Normally weekly);
- Daily Briefing Meetings to discuss day to day issues including new hazards identified;
- Ensuring workers are involved in formulating safe work practices, procedures and risk management activities;
- Use of a “Web Monkey” for raising and reporting WHS, QMS and EMS issues
- Announcements (like safety announcements) via: Memos, Mobile Phones and Safety Alerts
- Issues raised by workers, including contractors and service providers, through Supervisors

REVIEW OF CONSULTATIVE ARRANGEMENTS

Consultative Arrangements will be monitored and reviewed as work groups change or new workers become involved to ensure that consultation is both effective and that issues are being addressed.

As outlined in the InSite Consultation Statement it is the Policy of the Company to consult with relevant workers regarding Work Health & Safety issues through the following:

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3.16 Toolbox Meetings

InSite conduct weekly toolbox meetings during work hours (run for approx. 10-20 mins) in which workers can consult with management not only on crucial OHS issues, but other items such as:

- Updates on the status of corrective actions from daily briefings, previous toolboxes and OHS, Quality and Environmental Site inspections and audits.
- The tasks, deliveries etc. being undertaken over the coming week
- The state of workforce moral (whether high or low) and ways in which it can be improved by management to allow increased safety and productivity
- Safety Alerts from authorities such as WorkCover or the EPA, or other companies that have information to share on their own near misses/incidents etc.

3.17 Daily Briefing

InSite conduct daily briefings (Form S-WHS - F31) run by nominated supervisors each morning on site that describes the tasks that are to be completed during the day and the hazards associated with those tasks (run for approx. 5-10 mins). Workers have an opportunity to raise immediate OHS issues prior to commencing work in these briefings. Workers and visitors are to print name and sign briefing along with time in and time out on a daily basis.

3.18 Customer Communication

All formal/written communication with the Customer shall be directed through the Project Manager/Site Manager. All written communication to and from the site office shall be through the Project Manager or nominee.

A monthly report submitted to the Customer by the Project Manager shall address, but is not limited to, the following:

- Executive Summary;
- Problem Areas;
- Engineering/Design;
- Procurement;
- Manufacture;
- Construction;
- Commissioning;
- Project Control;
- Quality Management;
- Contract Administration;
- Programme Update

Meetings: The following meetings will be conducted during the delivery project:

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Type	Frequency	Attendees
Planning Meeting	On Request	Project Manager, InSite, USS
Coordination Meeting	Weekly	Project Manager, Site Supervisors
Customer Site Progress Meetings	On Request	Project Manager, InSite, USS
Daily Briefings	Daily	Project Manager, Site Supervisor and any contractors
Tool Box Meetings	Weekly	As determined on site All workers onsite
Management Meetings	Weekly	USS and InSite Project Manager

All media communication shall be via Urbn Surf (Sydney) Pty Ltd.

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4 Implementation

4.1 Risk Assessment

Identify and rank environmental issues.

Identify the range of environmental aspects and related impacts in relation to the site, the project or process including all activities related to the above.

Through a risk assessment process identify and prioritise risks based on likelihood and consequence. Consider impacts within the site and adjacent to the site. Consider also the key performance areas and commitments of the organisation's Environmental policy and the risks related to this project/process. Identify the general risk mitigation or management approach.

Keep in mind the scale of operational or financial impacts resulting from failure of the CEMP to adequately address risks. This includes potential penalties as well as loss of revenue and reputation

4.2 Identify and rank environmental issues

Identify the range of environmental aspects and related impacts in relation to the site, the project or process including all activities related to the above.

Through a risk assessment process identify and prioritise risks based on likelihood and consequence. Consider impacts within the site and adjacent to the site. Consider also the key performance areas and commitments of the organisation's Environmental policy and the risks related to this project/process. Identify the general risk mitigation or management approach.

Keep in mind the scale of operational or financial impacts resulting from failure of the CEMP to adequately address risks. This includes potential penalties as well as loss of revenue and reputation

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4.3 ENVIRONMENTAL RISK ASSESSMENT

- **Step 1 Determine Likelihood** – What is the possibility of the event happening?

	Criteria	Description
Almost certain	Expected in most situations	Event is a common problem
Likely	Will probably occur in most situations.	Event is known to have occurred at this site or it has happened
Possible	Might occur at some time	Event could occur at the site or I've heard of it happening
Unlikely	Could occur at some time	Event is not likely to occur at the site or I have not heard of it happening
Rare	May occur only in exceptional circumstances	Event is practically impossible.

- **Step 2 Determine Consequence** - What will be the result if it happens?

Classification	Example detail description
Insignificant	No environmental impacts
Minor	Spillage, leakage or release contained at site.
Moderate	Spillage, leakage or release contained but with help.
Major	Reasonable spillage, leakage or release of low hazardous substances
Catastrophic	Toxic release of chemicals major impact to the environment and safety of personal

- **Step 3 Determine the Risk Score**

LIKELIHOOD	CONSEQUENCE				
	Insignificant	Minor	Moderate	Major	Catastrophic
Almost Certain	3 High	3 High	4 Acute	4 Acute	4 Acute
Likely	2 Medium	3 High	3 High	4 Acute	4 Acute
Possible	1 Low	2 Medium	3 High	4 Acute	4 Acute
Unlikely	1 Low	1 Low	2 Medium	3 High	4 Acute
Rare	1 Low	1 Low	2 Medium	3 High	3 High

- **Step 4 Record risk score against the job sequence steps**
(Note – Risk scores have no absolute value and should only be used for comparison and to engender discussion.)

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Score	Action
4 A: Acute	ACT NOW – Urgent – do something about the risks immediately. Will require detailed pre-planning. Actions will be recorded on a Site Environmental Risk Assessment form.
3 H: High	Highest management decision is required urgently. Will require detailed pre-planning. Actions will be recorded on a Site Environmental Risk Assessment form.
2 M: Medium	Follow management instructions. Will require operational planning. Actions will be recorded on a Site Environmental Risk Assessment form.
1 L: Low	OK for now. Record and review if any equipment/ people/ materials/ work processes or procedures change. Will require localized control measures

Risk Control

Where elimination of the environmental risk is not reasonably practical, the **Hierarchy of Control** outlines the order in which the environmental hazards are to be controlled. A combination of controls is often required to minimize the risk to the lowest level reasonably practicable if no single measure is sufficient for that purpose.

As Low as Reasonably Practicable (ALARP) via the hierarchy of controls:

- Elimination
- Substitution
- Isolation
- Engineering
- Administration
- Environmental Control Measures

The Overall Environmental Risk of InSite projects is **HIGH**

Environmental hazards identified as relevant to the worksite must be addressed within Environmental Management Plan produced by the company or its sub-contractors and within written procedures.

4.4 Environmental Activities, Plans & Controls

Identify the range of procedures or work instructions required to effectively manage the environmental impacts, achieve opportunities and meet the CEMP objectives. The procedures should provide simple guidance on how the issues should be addressed. They may include step by step detail on what will be done, who will do it and when it will be done in the sequence of site, project operations.

These procedures or work instructions should clearly identify how they relate to the environmental objective or outcomes listed in the CEMP.

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These procedures can be developed around stages of the project or operational processes on site (e.g. stage 1 asbestos soil excavation, stage 2 capping works) or based on the issues to be managed (e.g. stormwater control, dust management, water conservation and reuse, noise abatement, soil erosion, storage of hazardous materials, waste management, air emissions etc.)

Procedures may be grouped into separate self-contained plans located within the framework of the CEMP (e.g. Erosion Control Plan, Inspection & Test Plans, Waste Management Plan, Air Quality Plan, Site Remediation Plan, Energy Management Plan etc. This approach is often used where there are complex operational controls, specific legal requirements and requests by consent authorities for such plans.

Example: List the tasks that specific site staff are required to do to minimise waste creation during the handling or processing of materials; storage of wastes, separation of wastes into designated bins and the location of bins to facilitate removal by contractors. Other procedures may include how waste is to be included in staff induction training or standards referenced in waste contractors services contracts.

Environmental Activities and Controls (InSite CEMP)		
Activity	Plan	Comment
General Earth Works	Erosion and Sediment Control Plan	
General Earth Works	Soil and Water Management Plan	
Excavating	Stockpiling of Materials	
Ground disturbance	Air Quality Management Plan	
Directing Traffic	Traffic Management Plan	
Fencing	Proposed Layout of Temporary Fencing Plan	
Using Plant and Equipment	Noise and Vibration Management Plan	
Waste	Waste Management Plan	
General Earth Works	Vegetation Plan	
Planning works	Community Consultation Plan	
General Earth Works	Heritage Management Plan	

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4.5 Dust Controls

Atmospheric Quality Controls; dust

Source/Trigger	Action
Wind >63km/hr	Avoid dust creating activities in Gale conditions. Use of silt / shade cloth around site. Water cannons, water carts, minimisation of vegetation clearing
Excavation & Backfilling	Limit excavations to lower surface area grids Water cart with water cannon to suppress dust
Stockpiling & Moving Soils	Stabilise with water spray / cannon Cover loads leaving the site 10km limit Covers to be removed / replaced progressively or at end of day
Monitoring	Visual observations & inspections Review & monitor meteorological conditions Regular assess/monitor controls and modify as required, i.e. change in prevailing wind In times of potential dust generation described above, use of a Dust Trak hand held monitor to test and verify compliance with NSW and NEPM requirements.

4.6 Erosion and Sediment Control Plan (ESCP)

Objective: *To ensure that the design, operation and management of all site erosion, sedimentation and water quality controls are integrated during construction or remediation activities and that operational impacts on the environment are minimised*

Urban runoff is a source of pollutants in NSW waterways and such pollution is caused by point sources. Contaminants are mainly transported by wind, rainfall or overland flow. Overland flow is especially relevant in areas with particles on impervious surfaces.

The aim of this ESCP is for the control of surface water and the prevention of erosion and sediment deposition specifically into the stormwater systems adjacent to the site and to prevent surface runoff from the site. It will do this by ensuring that the following measures will be put in place during all site works:

- Entry to the site will be confined to the designated location in the traffic management plan and all vehicles must follow the designated transport routes that will be marked by pickets, tape, ground paint or a combination of these. This is to prevent unnecessary site disturbance. These corridors will have to be moved depending upon where works on site are being carried out. All vehicles will operate in accordance with the Traffic Management Plan. Likewise the exit point will be through the designated exit with all trucks passing through the truck wash / rumble grid prior going onto any roads.
- A plan of the proposed location of all Erosion & Sedimentation Control (ESCP) measures.
- The ESCP will meet the requirements of the “Managing Urban Stormwater Soils and Construction” NSW Landcom 2004 4PthP Edition (March 2004)

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- Trenches containing contaminated water will not be lined as they will not contain water for an extended period of time.
- Asbestos contaminated material will stockpiled on level sealed surface be covered at night as the material has the potential to erode during a rain event or has the potential to create a dust hazard;
- Stockpiles will only be placed on sealed areas, or on top of a waterproof layer in unsealed areas;
- Stockpiles shall only be set up within the areas designated as free from items of Heritage significance;
- Silt fences will be constructed around any excavation and stockpile area from geotextile fabric to minimise potential migration of sediment anywhere else on site or to neighbouring properties;
- Any stormwater drains, pits and sumps located within the remediation works area will be protected by a combination of gravel “sausage” and sediment fences comprising of straw bales encased in geotextile fabric;
- If in areas where the anticipated level of sediment may be excessive then the silt fence will also be complemented with straw bales encased in geotextile fabric;
- All stockpiles will be placed at least 2 metres from all areas of concentrated water flow that may exist on site;
- Where possible stockpiles will have a maximum size of 1,000 cubic metres in dimensions but be restricted in height to 3 metres (not anticipated during these works).
- Progressive revegetation or the use of binding agents with grass seed sprays will be considered if necessary to further minimise dust propagation.
- All stockpiles will be placed away from drainage lines, gutters, stormwater pits or inlets;
- Validated backfill material will be reintroduced and suitably compacted in 0.3m lifts to minimise potential for differential erosion;
- All erosion and sediment controls will be checked by the Project Supervisor twice weekly or immediately after rain to ensure they are maintained in a fully functional condition. If in the event of accumulation of sediment around any controls that may reduce their effectiveness then the sediment will be removed by hand with shovel in such a manner as to not disturb or damage the control (i.e. geotextile containment sock or hay) in any way. If it is damaged then it will be replaced immediately. As a further preventative measures other ways will be considered and implemented to prevent any future sediment runoff in the area.
- Stockpiles will have no slopes greater than 30 degrees to minimise possible erosion and sediment migration to the base of the stockpile during rain activity events.

Other management strategies to control site erosion and the water quality of runoff as determined by the following factors could be implemented in addition to the above:

- material type;
- slope of site;
- site erosion hazard rating;
- surface rock;
- extent and duration of site disturbance;

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- Proximity of watercourses and drainage lines and sensitivity of receiving waters.

The proposed erosion and sediment controls and soil and water controls are illustrated in the erosion and sediment control plan Appendix C.

4.7 Soil and Water Management Plan (SWMP)

Objective: *To ensure that the design, operation and management of all site erosion, sedimentation and water quality controls are integrated during construction or remediation activities and that operational impacts on the environment are minimised*

The aim of this SWMP is for the control of surface water and the prevention of erosion and sediment deposition specifically into the stormwater systems adjacent to the site and to prevent surface runoff from the site. It will do this by ensuring that the measures as detailed in the ESCP will be put in place during site works in addition to the following:

- Minimise on site vehicle activity during periods of wet weather or when the site is muddy and remove soil on wheels or undercarriage prior to site departure; work will cease during heavy rainfall, and not be recommenced until the site dries out sufficiently to minimize disturbance of soils/fill;
- The project will be managed to prevent erosion at source rather than relying on sediment capture at discharge;
- The project will be staged to ensure vegetation clearing maintains as much natural vegetation wherever possible in accordance with project objectives;
- Disturbed areas will be stabilised as soon as practicable following completion, or temporary cessation, of earthworks. Additional slope stabilisation measures will be provided where required;
- Energy dissipaters or other scour prevention measures will be installed, downstream of culverts or other structures, as required to minimise erosion;
- Any fuel relating to the proposed work is to be contained in sealed vessels of appropriate volumes and stored within bunded areas. The work area bund shall be designed to collect and prevent down slope movement of 110% of the volume of all liquids and fuels stored or used on the site.
- Any spillage of fuels or wastes would be contained and collected in an appropriate manner (such as with the use of sand or sawdust) and the resultant contaminated material would be disposed of at an approved waste depot.
- The project will be designed to minimise runoff volume, velocity and peak flow rates, retain eroded sediment within the construction area and control loss of soil off site;
- Design specifications will include inspection, maintenance and follow-up programs for all water treatment devices and structures. All water treatment structures will be designed to be accessible for structural and vegetation maintenance and for removal of sediments. Control structures will be designed to be stable in the predicted peak flow from the appropriate design storm event.

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- The area of disturbed soil and vegetation will be minimised. Where possible, work will be undertaken in a staged manner to minimise the area of exposed soil at any one time.
- Stockpiles will be located on stable surfaces and away from potentially sensitive areas, particularly areas of concentrated water flows. Erosion control measures will be implemented as appropriate.
- Erosion and sedimentation controls are to be regularly inspected to ensure performance to the design criteria and maintained to design specifications. Controls are to be upgraded or altered if these objectives are found not to be satisfied.
- Existing drainage lines are to be identified in design and construction drawings and protected by using appropriate measures such as sedimentation barriers, timber windrows and grassed areas or by directing the site drainage water to a sediment control structure.
- Clean water that may run onto the site shall be diverted around the site to minimise the quantity of water that may require treatment prior to disposal or release. Water should be diverted along stable diversion drains, banks or bunds around or away from exposed areas of soil or loose material.

The proposed water / sediment controls are illustrated in the erosion and sediment control plan Appendix C.

4.7.1.1 Stockpiling of Materials

Only one type of material shall be stored in any given stockpile. The range of different materials that may be required to be separately stockpiled include, but are not limited to:

- Concrete/Bitumen Hardstand
- Steel (if concrete re-enforcement is encountered)
- VENM
- Asbestos impacted soils

4.7.1.2 Stockpile Locations

Stockpiles will be located in accordance with the following requirements;

- Placement of stockpiles adjacent to areas where capping of “fill areas” is to occur in volumes no larger than can be compacted into those fill areas without exceeding the capping volume.
- Secondary preference will be given to areas where soils can be easily loaded with asbestos impacted soil/fill directly into trucks for transport to asbestos licenced landfill. Stockpiles will only be placed at locations that have been first approved by the Project Manager.
- Stockpiles will be located in designated stockpile areas.
- No stockpiles of soils or other materials will be placed on footpaths or nature strips.

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- All stockpiles shall be placed away from drainage lines, gutters, stormwater pits or inlets.
- All stockpiles will be laid out on sealed surfaces where possible, and are to be covered and stored progressively to minimise dust and dour emissions and wash-off during rainfall.

4.7.1.3 Stockpile Area Preparation

All stockpiles will be constructed in areas of the site that have been located and prepared in accordance with the requirements of the site WMP. All these preparatory works will be undertaken prior to the placement of material in the stockpile. InSite will initially clear the area of rubbish, rubble and vegetation. The area will then be trimmed and graded, so that any local depressions or mounds are removed. The final surface of the stockpile area will then be made smooth and even. Buffer zones and access routes will be established around each stockpile area to prevent cross contamination and enable access to haul routes.

4.7.1.4 Construction and Maintenance

All stockpiles will be maintained in an orderly and safe condition. Batters will be formed with slope angles that are appropriate to prevent collapse or sliding of the stockpiled material. Provision for the management of both dust and surface water runoff from the stockpiles will be made so as to minimise the potential for environmental impact from these areas. These measures may include, but will not be limited to, progressive covering with geo-fab, the construction of temporary bunds around the handling areas and dust suppression by use of appropriate water spraying equipment depending on actual site conditions. Covering of stockpiles will be undertaken if required by the nature of the material (i.e. asbestos impacted) or meteorological conditions.

4.8 Air Quality Management Plan

Objective: *To ensure that construction or remediation activities generating exhaust emissions, dust and dirt are controlled to avoid degradation of air quality and nuisance to adjoining properties or the community*

It is recognised that site operations consisting of loading and disposal of materials have the potential for dust generation. The following specific dust control techniques will be applied when conducting works:

- Surface cover removal will be minimised at all times;
- No burning of rubbish or other material on site;
- Watering of active work areas including haul roads and stockpiles by hose or sprinklers to suppress dust in dry conditions when necessary (the water will be applied across ground surfaces to prevent the surface drying out and generating visible levels of dust, either by equipment operation or by wind);
- Traffic on site particularly heavy vehicle movements are to keep to marked traffic corridors to prevent unnecessary site disturbance;

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- Restriction of dust generating activities to low wind speed conditions;
- Use of wheel wash by vehicles prior to exit from site to avoid distribution of soils on the local road network;
- Speed limit of all vehicles on site is 10 kilometres an hour;
- If dust or soil is collecting on traffic routes where there is a “hardstand” area (i.e. concrete, bitumen, roadway etc.) then areas will be swept as required;
- All trucks are to have covered loads prior to exit from site;
- Sweeping of hardstand areas where visible dust may be accumulating on a regular basis
- All vehicles will be well maintained and in good operating order;

4.9 Traffic Management Plan

Objective: *To ensure that construction or remediation activities do not adversely affect or compromise the efficient operation, maintenance, safety or condition of local road assets, and that practical access to local road users and residents is maintained*

- All loading, treatment, supply deliveries are to have the least possible impact upon the site traffic thoroughfares. Heavy vehicle traffic will only be allowed to the site in the hours identified in the CEMP (Section 8), Noise and Vibration Monitoring Plan.
- Truck drivers will be given a truck driver induction prior to coming onto site.
- Trucks carrying contaminated material will be diverted away from areas which have been remediated, validated, or where clean fill has been placed. Backfill will be supplied by trucks other than those carrying contaminated materials from site.
- All vehicles will obey the rules of the road in all respects, and always run under legal weights.
- Vehicles will not form obstructions on-site. Truck movements will be staged to reduce the potential for queues.
- Queues will not be allowed to form outside the site and congest local roads.
- Any material removed from the site will be transported in accordance with government regulations and the requirements of SafeWork NSW.
- All off-site truck movements and deliveries will occur during normal working hours.
- All trucks/tankers carrying loads off-site will be licensed to transport the materials in accordance with EPA requirements and State Government regulations.

A plan showing proposed site traffic management is attached to Appendix B.

4.10 Proposed Layout of Temporary Fencing Plan

Objective: *To ensure that the site is secure and security maintained of site sheds & Earthmoving equipment, tools and that unauthorised entry site is eliminated for the safety of the residents and the community.*

The InSite Project Supervisor shall ensure the temporary work compound surrounded by temporary fencing is secure from all intruders when site unattended, and that the public is excluded access to the site at all times during the site works. InSite site signage to be placed where applicable.

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The proposed site fencing layout is shown on the TMP, Appendix B.

4.11 Noise and Vibration Management Plan

Objective: *To ensure that suitable measures are implemented to limit noise and vibration from construction or remediation activities in order to comply with regulatory authorities and minimise impacts to the local community*

It is recognised that site operations consisting of loading and disposal of materials has the potential for generation of noise and vibration.

- Remediation Works shall comply with the NSW EPA Environmental Operations (Noise Control) Regulation 2000 for the control of construction site noise.
- If complaints are received from nearby residents relating to noise during works, a record will be kept of the details of each complaint. Where complaints are received, the noise levels will be assessed and results reported to Council if the results are higher than highlighted in this plan.
- Noise control measures are to be implemented throughout the remediation process. Equipment will be selected for the project on the basis of its noise performance and will be fitted with noise attenuation mufflers to meet Australian Standards for noise generation.
- Noise from heavy haulage vehicles will be minimized by limiting their arrival time on site to 0700 hours and Australian Design Rules which apply to road registered vehicles.

4.11.1.1 Hours of work

All remediation work shall be carried out only between the hours of 7.00am and 5.00pm Monday to Friday, and 8am to 1pm on Saturdays if required.

4.12 Waste Management Plan

Objective: *To ensure that wastes are properly managed during construction and remediation activities in a way that is consistent with the principles of avoidance, reduction, and reuse and recycling*

The following waste management control measures will be implemented:

- preliminary and periodic assessment of all waste streams are to be undertaken to minimise wastes from the site and to undertake recovery and recycling wherever possible and reasonably practicable;
- identification of appropriately licensed waste transporters and waste management facilities for each waste stream; and
- Implementation of a system for waste tracking for all wastes including rubbish material.

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4.12.1.1 Material / Waste Tracking

A material tracking system will be established that will monitor the movement of materials. These forms will be completed daily and collated into a cumulative log weekly to enable tracking of all materials and may include:

- Materials off site shipping form;
- Materials importation form;
- Materials excavation form;
- Materials stockpiling form;
- Materials placement form; and
- Waste recovery and treatment form

4.12.1.2 Waste Minimisation

The following legislation and guidelines govern the management of waste for the project and have been referenced in the preparation of the project waste minimisation strategy:

- Waste Avoidance and Resource Recovery Act, 2001 replacing the Waste Minimisation and Management Act, 1995;
- Protection of the Environment Operations Act, 1997;
- Protection of the Environment Operations (Waste) Regulation 1996;
- Protection of the Environment Operations (General) Regulation 1998;
- Environmental Planning and Assessment Regulation, 2000, Schedule 2;
- Construction and Demolition Waste Action Plan (EPA, 1998);
- NSW Waste Reduction and Purchasing Policy (WRAPP) (EPA, 1999);
- Environmental Guidelines: Assessment, Classification and Management of Non-Liquid and Liquid Waste (EPA 1999 as revised 2004);
- Landfill Disposal of Industrial Wastes (EPA 1989);
- Waste Planning for Industry: A guide, Waste Management Authority of NSW, 1990.

All waste will be capped on site as a first option, or disposal to a licenced waste management facility as a second option if overburden or other contaminants which make it unsuitable for capping are present.

4.12.1.3 Disposal of General Rubbish Materials

The disposal of rubbish materials will be completed in accordance with the Protection of the Environment Operations Act and Regulations and the NSW EPA Environmental Guidelines: Assessment, Classification and Management of Non-Liquid Wastes (1999 as revised 2004).

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4.13 Vegetation Plan

Objective: *To ensure that project works to not allow the spread of noxious weeds from identified areas to new areas.*

InSite will ensure that no plant, equipment or personnel move into areas where the noxious weeds identified in the WMP have been identified. If required, an exclusion zone will be established around the identified area to eliminate any movement into that area and subsequently spreading the germination of noxious weeds.

4.14 Community Consultation Plan

Objective: *To ensure that a mechanism to receive and respond to issues raised by the community or other stakeholders is in place during construction or remediation activities.*

A sign displaying contact details of the remediation contractor (InSite) will be displayed at the site boundary allowing telephone contact 24 hours a day. Each complaint will be dealt with to ensure it is resolved in accordance with state and federal regulatory requirements.

Urbn Surf (Sydney) will be notified immediately of any complaint made to InSite, as well as briefed on the corrective actions that will be imposed should the internal investigation by InSite find areas for improvement/non-conformances.

5 Monitoring and Review

5.1 Environmental monitoring program

Monitoring of environmental performance and compliance auditing of InSite's Environmental Management Systems will be conducted throughout the works. This will enable the overall effectiveness of established environmental controls and compliance procedures to be assessed, and allow areas of non-conformance to be identified so corrective actions can be taken to improve Environmental outcomes.

The environmental monitoring and audit program should consist of daily, weekly and event based inspections and associated reports.

5.2 Environmental Monitoring and Inspection (Internally)

Quality Audits shall be performed in accordance with InSite Audit Procedure and Audit Calendar. These will be internal (and external for sub- contracted work) and shall be carried out in accordance with the project audit schedule and as considered necessary. Subcontractors shall detail audit requirements in their Quality Plans and shall provide their own detailed audit schedule covering both internal and external audits on their subcontractors.

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5.3 Audit Schedule

An Audit Schedule shall be established and progressively updated at appropriate intervals. Separate schedules shall be developed for internal and external audits. These schedules shall be established on the status and importance of each activity or subcontract and shall be varied according to the adequacy of the results. Follow-up audits may be performed where Corrective Action Requests (CARs) have been issued.

5.4 Audits

Audits may be carried out by the Project Environmental Officer, or may be delegated to other appropriately qualified independent personnel as necessary. NCRs raised during the audits shall be processed by the Project Environmental Officer. NCRs shall

- Only be closed out after corrective actions have been verified and accepted.

Audit records shall be maintained by the Project Environmental Officer and distributed, as a minimum to:

- Compliance Manager
- Director Project Management

Project EMS Audit Review	Planned Date	EMS Review Auditor	Comments

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6 Control of Non-Conforming Product

6.1 Environmental Nonconformance Reporting

The general steps of the procedure are as follows:

1. Identifying and holding products subject to an NCR in a designated holding area. For bulky or large nonconforming products which cannot readily be segregated, the area(s) of nonconformity shall be marked such that it is readily visible to any other user.
2. Recommendation and review of disposition/rectification by responsible parties;
3. Corrective action to correct the non-conformance;
4. Re-inspection of the reworked or repaired product;
5. If required obtain Customer approval for a Concession;

6.2 INCR Sources

The main sources of non-conformance may arise from but are not limited to:

- a. Receipt inspection;
- b. Manufacture, disassembly, assembly or construction processes, and
- c. Final inspections and test process.

6.3 Disposition of Nonconforming Products

Disposition of non-conformances may be achieved by:

- a. Rework to meet specified requirements;
- b. Acceptance with or without repair by concession;
- c. Regarding for alternative use, and
- d. Rejection/disposal.

6.4 Identification of Items Subject to NCR

Nonconforming items or products shall be appropriately identified, segregated and/or quarantined to prevent inadvertent use until appropriate disposition has been effected. Relevant parties such as the Project Manager and Customer shall be informed that an item is subject to an NCR.

6.5 Resolution of InSite INCR's

Where the non-conformance is related to InSite the personnel responsible for that activity (in conjunction with the Project Safety/Quality Representative), are responsible for:

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- a. Investigating the cause of non-conformances and approving and implementing the proposed corrective actions needed to prevent their recurrence using the INCR Reporting form.
- b. Evaluating the sources of the non-conformances by analysing relevant information as applicable, procedures, work instructions, concessions, quality records and customer complaints, in order to detect and eliminate further and potential causes of non-conformances.

7.6 Resolution of Other Parties NCR's

Where the non-conformance is related to other parties, the Project Safety/Quality Officer, in conjunction with the Project Manager or nominee is responsible for:

- a. Expediting the resolution of the non-conformance;
- b. Obtaining acceptance and approval of the corrective action from the relevant personnel and/or parties as required;
- c. Verifying implementation and effectiveness of corrective action through audit/surveillance/inspection as appropriate.
- d. Notification(s) of actual or potential non-conformances by the Customer shall be processed in accordance with the InSite Quality Manual.

6.6 Corrective & Preventive Action

Corrective and Preventive Action shall be carried out wherein:

- e. Non-conformances are reviewed to determine their causes and develop appropriate corrective and preventive action;
- f. Potential causes of non-conformances are identified and corrective action developed to prevent the occurrence;
- g. Corrective action is implemented and the effectiveness is followed up;
- h. Corrective action from results of audits is implemented effectively.

The need for Corrective Action is normally identified through:

- iv. Non-conformances
- v. Internal audits
- vi. External audits and Customer/Third Party audits.
- vii. Actions identified are logged on the INCR form and INCR Register.

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ENVIRONMENTAL PLAN APPROVALS

I have read and understand this Project (Site Specific) Construction Environmental Management Plan, including:

- Contract details
- Background
- Listing activities involved in the works
- Stating objectives
- CEMP Requirements
- Relevant codes of practice
- Emergency Response Procedures
- Environmental Management activities and controls
- Related Company Policies and Procedures.

Prepared by _____
Project Manager

Approved by _____
Operations Manager

Environmental Manager/ Quality Manager

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Appendix A: Emergency Response Procedure and Plan

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Appendix B: Traffic Management Plan

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Appendix C: Erosion and Sediment Control Plan Draft

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Appendix D Forms



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Daily Environmental Checklist

Project Name:
Project Number:
Project Location:
Project Manager:

Date

Completed by

Signed

Time Work Commenced

Time Work Concluded

Weather Conditions

Fine/Sunny

Overcast/Cloudy

Showers/Rain

Storms/Hail

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Wind None Slight Moderate Strong

N NE E SE S SW W NW

Notes:.....
.....
.....
.....

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Check of Site Controls

	Start of Day		End of Day	
Is safety fencing around excavation intact and in place?	Yes	No	Yes	No

Comments/actions:.....

Are sediment controls adjacent to excavation area intact and in working order?	Yes	No	Yes	No
--	-----	----	-----	----

Comments/actions:.....

Any sign of destabilisation of within excavation area?	Yes	No	Yes	No
--	-----	----	-----	----

Comments/actions:.....

Are sediment controls within the landfarm area intact and in working order?	Yes	No	Yes	No
---	-----	----	-----	----

Comments/actions:.....

Environmental deficiencies and control measures taken

.....

Sediment control measures checked after rain, list details

.....

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Environmental Incident Report Register

Date of Incident	Incident cause and effect	Incident Reported by	Incident Investigation Report Number

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Environmental Nonconformance Report Register

Date of Incident	Incident cause and effect	Incident Reported by	Incident Investigation Report Number

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Environmental Complaint Report Register

Date of Incident	Incident cause and effect	Incident Reported by	Incident Investigation Report Number

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**INSITE REMEDIATION SERVICES PTY LTD
ENVIRONMENTAL ACCIDENT / INCIDENT REPORT FORM**

PROJECT INFORMATION

Project Name: Former Mobil Tighes Hill	Name of Person Involved:
Project Number: IR02265	Name of Person Completing Report:
Date of Incident/Accident:	Date of Report:
Time of Incident/Accident:	Time of Report:

OUTCOME OF THE INCIDENT/ACCIDENT/NEAR MISS (circle)

Complaint	Report to Authorities	Property Damage	Near Miss
Media Report	Other		

NATURE OF INCIDENT OR NEAR MISS (brief description required)

DESCRIPTION OF AND SEQUENCE OF EVENTS THAT LED TO THE INCIDENT/NEAR MISS (if more space is required, attach the description to this form)

DESCRIPTION OF RESPONSE TO THE INCIDENT/NEAR MISS (if more space is required, attach the description to this form)



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NATURE OF IMPACT TO ENVIRONMENTAL RECEPTORS/SURROUNDING PROPERTY/LOCAL AREA (please list type of equipment & damage)

WITNESSES TO THE INCIDENT/NEAR MISS

Name:	Signature:
Name:	Signature:

CORRECTIVE ACTIONS (if more space is required, attach the description to this form)

Corrective Action	By Whom	Date to be Completed

CORRECTIVE ACTIONS WITNESS & SIGN OFF (corrective actions implemented, approved and signed off by the Site Safety Officer and Operations Manager)

Name:	Signature:
Name:	Signature:

STATUTORY AUTHORITY NOTIFICATION (if required)

Date Notified:	Notified by Whom:
Agency Notified:	Time of Notification:
Person Notified:	Type of Notification:

REPORT SIGN OFF

Compiled by:	Signature:
Date:	



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Environmental Non-conformance Report (NCR)

RETURN TO: InSite Remediation Services Pty Ltd

Nonconformance Report Number

Any person involved in observing a nonconformance is to complete a Nonconformance Report.

Return the completed Report immediately to the Environmental Management Representative.
Maintain a copy in the Site Specific Environmental Management Plan.

Site Address:

PROJECT NUMBER:

SITE SUPERVISOR:

Telephone:

Location of Nonconformance within site:

Nonconformance Reported by:
Position:

Signature:

Date: / / Time: am/pm

Section 1 - Nonconformance

Nonconformance Details:
Describe clearly the nonconformance.

.....
.....
.....
.....
.....
.....



Cause of Nonconformance:
Describe clearly the circumstances leading to the nonconformance. As far as possible, verify
The facts recorded and identify witnesses.

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.....
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.....
.....

Immediate Action Taken (if any):

.....
.....
.....
.....
.....

Person Responsible for Action:Date: / /

Is further Corrective and/or Preventive Action Required? Yes / No
If Yes, complete the Corrective and/or Preventive Action Section below.
If No, close this NCR in the Nonconformance Register.

Section 2 – Corrective Action and/or Preventive Action

Required Corrective and/or Preventive Action:
Describe clearly the Corrective and/or Preventive Action required.

.....
.....
.....
.....

Person Responsible for Corrective Action:Date: / /

Would changes required to EMS Procedures/Documents prevent further
Nonconformance? Yes / No

Section 3 - Verification/Closure

Environmental Management Representative to Review Effectiveness by: Date: / /

Effectiveness Satisfactory? Yes / No

Environmental Management Representative (Signature) Date / /

If Yes, close this NCR in the Nonconformance Register.

If No, further action is detailed on NCR Number.

NCR Closure Date: / /

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