

# Bulk Recovery Solutions Pty Ltd

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN  
BULK RECOVERY SOLUTIONS PTY LTD  
16 KERR ROAD INGLEBURN NSW 2565

**Prepared for:** Bulk Recovery Solutions Pty Ltd  
NSW Department of Planning, Industry and Environment

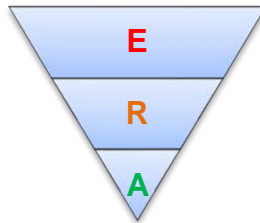
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**Prepared by:** Nicolas Israel, Director

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**Release Date:** 7 July 2021

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*We Aim to Excel in all Aspects of Business  
We Speak your Environmental Language*

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|          |            |                                 |                                      |
|          |            |                                 |                                      |

## ABBREVIATIONS & GLOSSARY OF TERMS

|   |   |
|---|---|
| <b>AHD</b>                                    | Australian Height Datum   |
| <b>Applicant</b>                              | Bulk Recovery Solutions Pty Ltd   |
| <b>Appropriate Regulatory Authority (ARA)</b> | Generally, the appropriate regulatory authority is the EPA for licensed premises and local Council for non-licensed premises. There are exceptions to this definition as stated in Clause 6 of the POEO Act.  |
| <b>AQIA</b>                                   | Air Quality Impact Assessment   |
| <b>AS</b>                                     | Australian Standard   |
| <b>AWS</b>                                    | Automatic Weather Station   |
| <b>BCA</b>                                    | Building Code of Australia  |
| <b>CEMP</b>                                   | Construction Environmental Management Plan  |
| <b>Consent</b>                                | Development Consent SSD 8593  |
| <b>Council</b>                                | Campbelltown City Council   |
| <b>BRS</b>                                    | Bulk Recovery Solutions Pty Ltd which is the occupier of the premises and operator of the business subject to this plan   |
| <b>Company</b>                                | Bulk Recovery Solutions Pty Ltd   |
| <b>CSIRO</b>                                  | Commonwealth Scientific and Industrial Research Organisation  |
| <b>DEC</b>                                    | NSW Department of the Environment and Conservation  |
| <b>DECC</b>                                   | NSW Department of Environment and Climate Change  |
| <b>Department</b>                             | Department of Planning, Industry and Environment  |
| <b>Environment</b>                            | As defined in the POEO Act, <i>"environment" means components of the earth, including:</i><br><i>(a) land, air and water, and</i><br><i>(b) any layer of the atmosphere, and</i><br><i>(c) any organic or inorganic matter and any living organism, and</i><br><i>(d) human-made or modified structures and areas,</i><br><i>and includes interacting natural ecosystems that include components referred to in paragraphs (a)-(c).</i> |
| <b>EPA</b>                                    | NSW Environment Protection Authority  |
| <b>EP&amp;A Act</b>                           | Environmental Planning and Assessment Act 1979  |
| <b>EPBC Act</b>                               | Environment Protection and Biodiversity Conservation Act 1999   |
| <b>EPL</b>                                    | Environment Protection Licence  |
| <b>Harm</b>                                   | As defined in the POEO Act, <i>"harm" to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.</i>  |
| <b>Immediately</b>                            | Promptly and without delay.   |
| <b>Material risk of harm</b>                  | "Material risk of harm to the environment" is defined under Section 147 of the POEO Act as:<br><i>(a) harm to the environment is material if:</i><br><i>(i) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or</i>   |

(ii) *It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and*

(b) *loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.*

|                           |  |
|---------------------------|--|
| <b>mg</b>                 | Milligram ( $\text{g} \times 10^{-3}$ )  |
| <b>µg</b>                 | Microgram ( $\text{g} \times 10^{-6}$ )  |
| <b>µm</b>                 | Micrometre or micron ( $\text{metre} \times 10^{-6}$ )   |
| <b>m<sup>3</sup></b>      | Cubic metre  |
| <b>NEPC</b>               | National Environment Protection Council  |
| <b>NHMRC</b>              | National Health and Medical Research Council   |
| <b>NIA</b>                | Noise Impact Assessment  |
| <b>NPI</b>                | Noise Policy for Industry 2017   |
| <b>OEH</b>                | Office of Environment and Heritage   |
| <b>Occupier</b>           | As defined under the POEO Act, <i>“occupier” of premises means the person who has the management or control of the premises.</i>   |
| <b>OU</b>                 | Odour Units; concentration of odorous mixtures in odour units. The number of odour units is the concentration of a sample divided by the odour threshold or the number of dilutions required for the sample to reach the threshold. This threshold is equivalent to when 50% of a testing panel correctly detect an odour  |
| <b>Planning Secretary</b> | Secretary of the Department of Planning, Industry and Environment  |
| <b>PM<sub>10</sub></b>    | Particulate matter less than 10 microns in aerodynamic diameter  |
| <b>PM<sub>2.5</sub></b>   | Particulate matter less than 2.5 microns in aerodynamic diameter   |
| <b>POEO Act</b>           | Protection of the Environment Operation Act 1997   |
| <b>Pollution</b>          | As defined under the POEO Act, <i>“pollution” means:</i><br>(a) <i>water pollution, or</i><br>(b) <i>air pollution, or</i><br>© <i>noise pollution, or</i><br>(d) <i>land pollution.</i>   |
| <b>Pollution Incident</b> | The <i>Environmental Guidelines: Preparation of pollution incident response management plans</i> defines a pollution incident as:<br>“...an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit 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 a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.” |

|                                |  |
|--------------------------------|--|
| <b>Premises</b>                | As defined under the POEO Act, " <i>premises</i> " includes:<br>(a) a building or structure, or<br>(b) land or a place (whether enclosed or built on or not), or<br>© a mobile plant, vehicle, vessel or aircraft.   |
| <b>Premises/Site</b>           | 16 Kerr Road, Ingleburn NSW 2565   |
| <b>Prevention of pollution</b> | Use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution.<br><br>Note: The potential benefits of prevention of pollution include the reduction of adverse environmental impacts, improved efficiency and reduced costs. |
| <b>RMS</b>                     | Roads and Maritime Services  |
| <b>Scheduled activity</b>      | "Scheduled activity" means an activity listed in Schedule 1 of the POEO Act. Scheduled activities must be licensed under the POEO Act.   |
| <b>Spill kit</b>               | A set of equipment used to isolate or control an accidental overflow or release of a substance or material.  |
| <b>SSD</b>                     | State Significant Development  |
| <b>TSP</b>                     | Total Suspended Particulate  |
| <b>tpa</b>                     | Tonnes per annum   |
| <b>USEPA</b>                   | United States Environmental Protection Agency  |
| <b>Waste</b>                   | As defined in the Protection of the Environment Operations Act 1997  |
| <b>WHO</b>                     | World Health Organisation  |

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| <b>Attachment 4 – BRS CEMP Unexpected Finds Protocol</b>              |
| <b>Attachment 5 – BRS Construction Traffic Management Plan</b>        |

# 1. INTRODUCTION

Environmental Risk Assessors Pty Ltd has been commissioned by Bulk Recovery Solutions Pty Ltd (BRS) to prepare a Construction Environmental Management Plan (CEMP) for its proposed Resource Recovery facility at 16 Kerr Road, Ingleburn NSW 2565. The proposed processing capacity is 125,000 tonnes per year of liquid waste. The CEMP is required to ensure compliance with specific requirements included in relevant conditions of Development Consent No SSD 8593 (Consent) which was issued by the Department of Planning, Industry and Environment (Department) to BRS on 26 May 2021. However, it was considered appropriate to address other conditions that are associated with the construction stage of the development. The CEMP does not apply to the operational stage of the development. The Consent applies to site located at 16 Kerr Road, Ingleburn within the Campbelltown City Council Local Government Area.

**Table 1-1** includes all construction related conditions and where these conditions are addressed in this document.

The approved development is the receiving and processing of 125,000 tonnes per annum (tpa) of liquid waste comprising drilling mud and non-destructive drill mud, cement slurry, concrete washout, oily water (J120), sewage sludge including sewer grit or screenings, stormwater, groundwater (including M250, J100, N160, and F100), industrial wastewater, leachate and firewater (N140).

The approved development provides also for the storage of 5,100 tonnes of liquid waste and liquid waste by-products on site at any one time.

The approved development also includes a weighbridge, upgrade of the stormwater management system, internal storage bays and use of a three-story office.

Under normal circumstances, developments comprise three stages; demolition, construction and operation. This CEMP applies to the demolition and construction stages only.

This CEMP was prepared in context of the following two documents:

- AS/NZS ISO 14001, *Environmental Management Systems – Specifications with guidance for use* and AS/NZS 14004, *General guidelines on principles, systems and supporting techniques*, and
- *Guideline for the Preparation of Environmental Management Plans* published by the Department of Infrastructure, Planning and Natural Resources in 2004.

This CEMP has been prepared in line with the revised Environmental Impact Statement (EIS) prepared by KDC Consultants, Response to Submissions (RTS) and revised RTS as well as other information submitted by the applicant to the Department. The CEMP is also prepared in line with all scientific reports supporting the EIS and their updated revisions as well as the requirements of the development consent SSD 8593.

This CEMP provides the framework so that the construction activities are undertaken mindful of potential environment impacts of activities to minimise potential to cause nuisance and harm to all those potentially affected by the activities to be undertaken on site during the construction

stage. The CEMP also serves to ensure that BRS commitments to minimise and reduce potential harm to the environment and human health will be adhered to.

## 1.1 OBJECTIVES

### 1.1.1 General

The purpose of this Construction Environmental Management Plan (CEMP) is to provide a reliable framework for the management of all potential environmental impacts that are likely to be caused by the construction activities on the BRS site, while recognising the needs of industry, government and the community, and the need for the site to operate economically and efficiently. This CEMP is designed to document site management practices and procedures that utilise the latest and most practical technologies available to minimise the impact of the construction activities on the environment, local residents and surrounding developments.

This CEMP is being prepared to ensure appropriate management of all potential environmental aspects and impacts that may occur during the construction stage of this project. The CEMP has been developed to consider the management of site-specific environmental impacts, with consideration to its particular situation and using appropriate and practical management practices during the construction stage. The CEMP may require periodic reviews and revisions in order to respond to changes in best management practices and technology advances.

This CEMP covers the following aspects associated specifically with the approved activities:

- Planning and environmental statutory requirements,
- Site-specific Construction Environmental Management measures and procedures,
- Roles and Responsibilities of management and staff,
- Training of staff and contractors,
- Communications,
- On-going monitoring of CEMP performance, and
- Detailed procedures in a format for hands-on operations.

Commitments have been made by BRS management that the objectives above will be achieved, maintained and adhered to continuously as part of the construction stage of the development.

### 1.1.2 Specific Objectives

This CEMP has been prepared to form part of obtaining approval from the Planning Secretary as required by the consent granted by the Department. On that basis, the specific objectives are linked directly to the consent conditions relevant to the construction stage of the development. These conditions are listed in **Table 1-1** below.

Table 1-1: Construction Related Conditions – SSD 8593

| No                                  | Condition   | Comments  |     |      |                             |                             |                              |   |
|-------------------------------------|---|---|-----|------|-----------------------------|-----------------------------|------------------------------|---|
| <b>NOTIFICATION OF COMMENCEMENT</b> |   |   |     |      |                             |                             |                              |   |
| A10                                 | <p>The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary:</p> <ul style="list-style-type: none"> <li>(a) construction;</li> <li>(b) operation;</li> <li>(c) cessation of operations; and</li> <li>(d) decommissioning.</li> </ul>  | <p><b>A notification letter was uploaded to the portal late last week advising that construction will commence as soon as the CEMP is approved by the Planning Secretary</b></p> <p><b>Construction commencement date is 12 July 2021</b></p> |     |      |                             |                             |                              |   |
| <b>AIR QUALITY</b>                  |   |   |     |      |                             |                             |                              |   |
| <b>Dust Minimisation</b>            |   |   |     |      |                             |                             |                              |   |
| B5                                  | The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent   | <b>Sections 5 &amp; 6</b>   |     |      |                             |                             |                              |   |
| B6                                  | <p>During construction of the development, the Applicant must ensure that:</p> <ul style="list-style-type: none"> <li>(a) exposed surfaces and stockpiles are suppressed by regular watering;</li> <li>(b) all trucks entering or leaving the site with loads have their loads covered;</li> <li>(c) trucks associated with the development leaving the site do not track dirt onto the public road network; and</li> <li>(d) public roads used by these trucks are kept clean.</li> </ul>              | <b>Sections 5 &amp; 6</b>   |     |      |                             |                             |                              |   |
| <b>Hours of Work</b>                |   |   |     |      |                             |                             |                              |   |
| B15                                 | <p>The Applicant must comply with the hours detailed in Table 2, unless otherwise agreed in writing by the Planning Secretary.</p> <p><b>Table 2 Hours of Work</b></p> <table border="1"> <thead> <tr> <th>Activity</th><th>Day</th><th>Time</th></tr> </thead> <tbody> <tr> <td>Earthworks and construction</td><td>Monday – Friday<br/>Saturday</td><td>7 am to 6 pm<br/>8 am to 1 pm</td></tr> </tbody> </table>   | Activity  | Day | Time | Earthworks and construction | Monday – Friday<br>Saturday | 7 am to 6 pm<br>8 am to 1 pm | <b>Attachments and Sections 3 &amp; 5 &amp; 6</b> |
| Activity                            | Day   | Time  |     |      |                             |                             |                              |   |
| Earthworks and construction         | Monday – Friday<br>Saturday   | 7 am to 6 pm<br>8 am to 1 pm  |     |      |                             |                             |                              |   |
| B16                                 | <p>Works outside of the hours identified in condition B15 may be undertaken in the following circumstances:</p> <ul style="list-style-type: none"> <li>(a) works that are inaudible at the nearest sensitive receivers;</li> <li>(b) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or</li> <li>(c) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.</li> </ul> | <b>Sections 5 &amp; 6</b>   |     |      |                             |                             |                              |   |
| <b>Construction Noise Limits</b>    |   |   |     |      |                             |                             |                              |   |
| B17                                 | The development must be constructed to achieve the construction noise management levels detailed in <i>the Interim Construction</i>   | <b>Sections 5 &amp; 6</b>   |     |      |                             |                             |                              |   |

|   |  |  |
|---|--|--|
|   | Noise Guideline (DECC, 2009) (as may be updated or replaced from time to time). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures in the Appendix 2.  |  |
| <b>Imported Soil</b>                              |  |  |
| B22   | <p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) ensure that only VENM, ENM, or other fill material approved in writing by EPA is brought onto the site;</li> <li>(b) keep accurate records of the volume and type of fill to be used; and</li> <li>(c) make these records available to the Planning Secretary upon request.</li> </ul>   | <b>Sections 5 &amp; 6</b>                  |
| <b>Erosion and Sediment Control</b>               |  |  |
| B23   | Prior to the commencement of any construction for the development, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the <i>Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book</i> (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.   | <b>Attachment 2 and Sections 5 &amp; 6</b> |
| <b>ABORIGINAL HERITAGE</b>                        |  |  |
| <b>Unexpected Finds Protocol</b>                  |  |  |
| B33   | <p>If any item or object of Aboriginal heritage significance is identified on site:</p> <ul style="list-style-type: none"> <li>(a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately;</li> <li>(b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and</li> <li>(c) Heritage NSW must be contacted immediately.</li> </ul>  | <b>Attachment 4 and Sections 5 &amp; 6</b> |
| B34   | Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the <i>National Parks and Wildlife Act 1974</i> .   | <b>Attachment 4 and Sections 5 &amp; 6</b> |
| <b>CONTAMINATION</b>                              |  |  |
| <b>Unexpected Finds</b>                           |  |  |
| B40   | Prior to the commencement of construction for the development, the Applicant must prepare an unexpected finds procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition C2 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site. | <b>Attachment 4</b>                        |
| <b>CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN</b> |  |  |
| C2  | The Applicant must prepare a Construction Environmental Management Plan (CEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.  | <b>This document</b>                       |

|    |  |  |
|----|--|--|
| C3 | As part of the CEMP required under Condition C2 of this consent, the Applicant must include the following:<br>(a) Erosion and Sediment Control Plan;<br>(b) Complaints Handling;<br>(c) an unexpected finds protocol; and<br>(d) details of traffic management   | <b>Attachments 2, 3, 4 and 5</b>                     |
| C4 | The Applicant must:<br>(a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and<br>(b) carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time. | <b>Awaiting approval from the Planning Secretary</b> |

## 1.2 THE COMPANY

The Company is Bulk Recovery Solutions Pty Ltd (BRS) with an ABN 51 148 898 784. BRS is a family-owned business which has been operating an RRF at the site since 2016. A range of liquid and solid waste types are currently recovered on site, primarily comprising building and demolition waste generated throughout the Sydney region. Customers include, but not limited to:

- Veolia Environmental Solutions
- Sydney Water
- Patriot Environmental
- SureSearch
- Suckers Excavations
- Dig Smart
- Hanson
- Boral
- Holcim
- Weir Minerals
- John Heine & Sons
- Lend Lease
- Borg Civil
- Langford Environmental
- Hancock Excavations
- Warwick Farm Landscape
- Express Waste

It is proposed that BRS will continue to operate the RRF with the ability to process a greater quantity and type of liquid and solid waste types to meet growing market demand.

BRS currently operate under a development consent granted by Campbelltown City Council (948/2015/DA-I) and an Environmental Protection Licence (EPL 20797) issued by the

Environment Protection Authority (EPA). Consent to discharge industrial trade wastewater to the sewer has also been obtained from Sydney Water (Consent Number No 38498).

The company's details are provided below.

Bulk Recovery Solutions Pty Ltd is an Australian owned and operated family company which was established in 2011.

|  |                                  |
|--|----------------------------------|
| Physical address:                      | 16 Kerr Road, Ingleburn NSW 2565 |
| Postal address:                        | 16 Kerr Road, Ingleburn NSW 2565 |
| Current applicant contact details are: |                                  |
| Phone:                                 | (02) 8717 3366                   |
| Fax:                                   | N/A                              |
| Email:                                 | Tim@bulkrecoveryolutions.com     |

The details of the premises are provided below.

|                        |  |
|------------------------|--|
| Grid reference:        | lat = -33.991513 and Long = 150.869747 (middle of site)<br>lat = -33.991574 and Long = 150.868946 (Street address) |
| Zone:                  | 56   |
| Elevation:             | 26-27 m  |
| Local Government Area: | Campbelltown City Council  |
| Land Use Zoning:       | IN1 – General Industrial   |

Tim Baillie, the managing director of BRS is considered to be an expert in solid and liquid waste processing and treatment. Tim will be applying his expertise in ensuring that the correct materials are used for the specific location of the construction stage.

## 2. PREMISES AND PROPOSAL DESCRIPTION

A brief outline of the subject premises has been provided below.

### 2.1 DESCRIPTION OF PREMISES AND SURROUNDS

The site is located at 16 Kerr Road, Ingleburn, NSW and is legally described as Lot 16 DP717203. It is located within the Campbelltown local government area (LGA). The site is approximately 1.295 hectares (ha) in area, is rectangular in shape and positioned at the end of the Kerr Road cul-de-sac (**Figure 2-1**). It is zoned IN1 General Industrial under the Campbelltown Local Environmental Plan 2015 (LEP 2015) and located within the Ingleburn Industrial area.

Immediately adjoining the site is Henderson Road to the northeast, a railway line (the Main Southern Railway Line) adjoins to the southeast and industrial premises are constructed on both the southwest and northwest site boundaries. The nearest residential dwelling is 50 metres (m) to the southeast, across the railway line. Bunbury Curran Creek lies approximately 350m to the north of the site and serves as a stormwater outlet for the surrounding area (**Figure 2-2**).

The Ingleburn Industrial area comprises a mix of general industrial uses including warehousing, distribution centres and vehicle repair centres. Neighbouring the site to the south is another RRF known as Campbelltown Recyclers.

To give the reader a better understanding of the location of the site/premises, **Figure 2-1** shows an aerial view of the premises in the local context including the surrounding activities/developments.

Extract from the land zoning map showing the subject premises location is presented in **Figure 2-2**.

The site includes a large 3 story concrete building which currently occupies the site. Included within the building is a warehouse, maintenance/plant room, office space and waste processing area. Concrete hardstand covers the remaining site which provides vehicle access, car parking and stormwater management.

Access to the site is provided via a double driveway at the cul-de-sac head on Kerr Road. The western most driveway provides access to the rear of the building via a security office and weighbridge. The eastern most driveway provides access to the front of the building, office space and staff / visitor car parking.



**Figure 2-1: Location of the Premises on Kerr Road****Figure 2-2: Location of the Premises within the Industrial land Zone**



Access to the site from the Hume Motorway is via a series of approved b-double routes as shown in **Figure 2-3**. Vehicles travelling north on the Hume Highway, to and from the site, follow Brooks Road, Williamson Road, Henderson Road, Lancaster Street, Aero Road, and Kerr Road. Vehicles travelling south on the Hume Highway to and from the site, are required to travel further south along Williamson Road before accessing the southbound Hume Highway Interchange.

**Figure 2-3: Heavy Vehicle Route and Key Intersections**



BRS currently operate an existing RRF from the site which recovers both solid and liquid waste up to 30,000tpa and stores up to 5,000t at any one time.

## 2.2 POTENTIALLY SENSITIVE RESIDENTIAL RECEPTORS

As previously stated, the premises is located within a mainly industrial area. The activities will be well shielded from the surrounding rural residential environment by the existing built environment such as the topography of the premises, the buildings associated with the adjacent industrial facilities and the landscaping including the large trees and shrubs. In addition, a large noise wall/barrier is constructed at the eastern side of the site, to provide additional shielding of the activities will assist further in protecting humans and the environment from any potential impact.

Based on the EPA's document "NSW DEC (EPA) Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales – August 2005", the following definition of sensitive receptor is provided: "**Sensitive receptor** A location where people are likely to work or reside; this may include a dwelling, school, hospital, office or public recreational area. ....". However, as the premises is located within an industrial area where a variety of industrial and commercial activities are undertaken, it was considered appropriate to pay greater attention to the location of the premises relative to the residential zoned areas under Campbelltown Local Environmental Plan 2015.

In any case, based on the technical assessments undertaken during the application process and our inspections of the premises and surrounding environment, the proposed construction activities are unlikely to have any adverse impact on any sensitive residential receptor when appropriate mitigation measures are implemented and maintained, as they will be, at all times. The construction activities are likely to have low impact on the employees working on site. However, again when appropriate mitigation measures are fully implemented, this will neutralise any such impact. Discussions have already commenced to work out a mutually agreed position on the best approach to ensure that the employees are not adversely impacted by any of the construction activities undertaken by BRS and its construction contractors. The locations of the closest potentially sensitive residential receptors are included in **Figure 2-4**. **Figure 2-4** includes also nearby potentially affected industrial receptors.

**Figure 2-4: Closest Potentially Sensitive Residential Receptors**





### 3. HOURS OF CONSTRUCTION ACTIVITIES

Under normal circumstances, the hours of construction would depend on certain activities and the contractors' availability with some periods busier than others. The proposed hours of construction activities are:

- |                    |                 |
|--------------------|-----------------|
| ❖ Monday to Friday | 7.00am – 6.00pm |
| ❖ Saturday         | 8:00am - 1.00pm |
| ❖ Sunday           | No work         |
| ❖ Public holidays  | No work         |

### 4. EMPLOYMENT

The construction stage of the approved development is expected to generate employment for 3-5 people at the subject premises. A small number of delivery vehicles could be required. However, these vehicles will be at the premises for a few minutes only at any one time.

## 5. SUMMARY OF ENVIRONMENTAL ASSESSMENT

This Section provides a summary of the environmental assessments associated with the Construction Stage only.

### 5.1 CONSTRUCTION STAGE

The proposed construction activities are mostly inside the building with the exception to the stormwater upgrading which will be undertaken in the north-western corner of the site and the weighbridge. Overall, the construction activities inside the building are mostly installation of tanks, pumps, valves, filters, pits and storage bays. The outside activities also include excavation. There is no demolition of any existing structures.

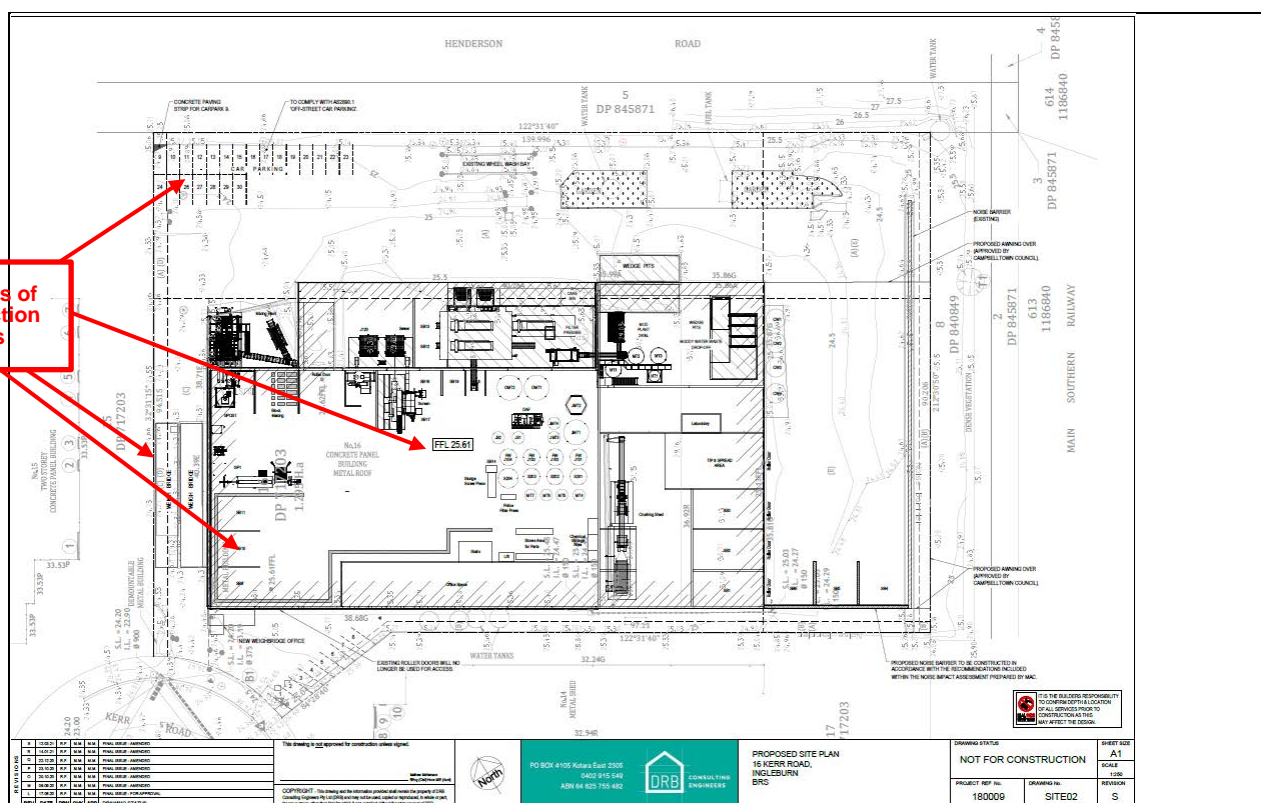
If required, only VENM materials, ENM materials or materials that will comply with an existing Resource Recovery Order will be used in the construction of the required structures. However, for the hardstand areas, finished products such as sand, recovered aggregate and concrete will be used.

The proposed construction areas are presented in **Figure 5-1** below.

In total, the construction period is likely to take approximately 4-6 weeks depending on the approval process, contractor's availability and other construction industry related factors.

Based on the above construction activities, the potential impacts are outlined below.

**Figure 5-1: Locations of Approved Construction Works**



### 5.1.1 Air Quality

An Air Quality Impact Assessment (AQIA) was Todoroski Air Sciences for the proposed Resource Recovery facility and a Response to submissions was also provided by the same consultant.

The AQIA demonstrated that the development will comply with current NSW criteria and will have no impact on the potentially sensitive residential receptors provided that the recommended mitigation measures are fully implemented at the premises.

Based on the potential dust generated during the construction stage, specific mitigation measures will be implemented to minimise the generation of dust. These mitigation measures are presented in **Table 5-1** below.

### 5.1.2 Noise Impact

A revised Noise Impact Assessment (NIA) was undertaken by White Noise Pulse Acoustics in March 2021.

The NIA demonstrated that the development will comply with the noise limit specified by the both the Department and EPA and will have no impact on the potentially sensitive residential receptors provided that the recommended mitigation measures are implemented at the premises. These mitigation measures are presented in **Table 6-1** within **Section 6**.

Since the construction stage does not include any crushing or screening activities which we demonstrated that they are the most dominant noise generating activities, the fact that only relatively small machinery will be used during the construction stage and for a very short period of time, it is expected that construction noise is unlikely to cause any significant impact on the neighbouring properties especially if the construction works are undertaken during the specified construction hours.

### 5.1.3 Waste Management

Waste management during the construction stage is as important as during the operation stage due to the fact that a few contractors will be on site for short periods of time and are likely to leave behind some waste. Therefore, it is of utmost importance that waste management be included in the induction sessions of all contractors and employees to prevent residual waste from being left on the site at the end of their contract. The waste management processes and strategies outlined below should be adhered to during the construction stage.

The premises management will not receive materials from unknown sources to avoid any potential environmental implications. The premises management will adhere to the EPA's guidelines titled ***"DRAFT – Protocol for managing asbestos during resource recovery of construction and demolition waste"*** (guidelines). However, these guidelines will be applied to asbestos as well as any other potentially hazardous or special waste.

In any case and as a minimum, the comprehensive procedures included in the “**Unexpected Finds Protocol**” provided in **Attachment 4** will be adhered to by all employees and contractors.

#### 5.1.4 Chemical Storage

During the construction stage only dry and inert materials will be received at the premises. No liquid waste, special waste, restricted solid waste or hazardous materials will be received at the premises as part of this stage of the development. In addition, no storage of fuels or other flammable materials associated with the construction stage will occur at the premises. Only small quantities of household grade detergents, pesticides, herbicides, etc.... will be stored on the premises. These small quantities are well below the threshold to trigger the requirements of SEPP 33. Therefore, a Fire Management Plan is not warranted during the construction stage.

#### 5.1.5 On-Site Sewerage Management

We confirm that there will be no mechanical repair workshop operating on the premises and therefore no wastewater will be generated as a result of the construction activities.

The only greywater that will be generated from the construction employees and part time contractors will be from the kitchen sink, the toilet and shower. No cooking or washing clothes will occur on the premises. This is equivalent to less than a family of 4 since they will be on the premises for less than 60 hours per week rather than 168 hours per week for a family. This is equivalent to less than 36% of the load for a family of 4. When considered the reduced number of employees activities, the load will be equivalent to one (1) person.

For the construction stage, the existing amenities will be used by the contractors as they are more than adequate to accommodate for these contractors.

#### 5.1.6 Traffic and Access

A revised Traffic Impact Assessment report (TIA) for the development was prepared by Intersect Traffic in March 2021 in accordance with the Roads and Maritime Services’ (RMS) and Campbelltown City Council requirements.

The T&PIS took into consideration the worst-case scenarios of traffic generated as a result of the proposed activities. The TIA determined that the extent of the impact of the activities in traffic movements is insignificant compared with existing traffic movements on the roads likely to be used by the trucks entering and leaving the proposed facility.

For the construction stage, it is expected to have much lesser number of trucks than for the operation stage and therefore based on the same traffic and parking assessment report, traffic impact is minimal on the surrounding roads and neighbouring properties.

A more detailed “**Construction Traffic Management Plan**” is presented in **Attachment 5**.

### 5.1.7 Stormwater

A revised Stormwater Management Plan and assessment were undertaken in March 2021 by DRB Consulting Engineers for the proposed Resource Recovery facility.

The calculations for sizing the OSD included in the Stormwater Management Plan were undertaken by using the EPA's approved guidelines. Several recommended management and mitigation measures will be implemented on site to ensure that pollution of water is prevented at all times. Monitoring program is also provided.

### 5.1.8 Erosion and Sediment Control

Sediment and erosion control measures will be installed during both the construction and operation stages. More details are included in the Sediment and Erosion Control plan associated with the construction stage are included in **Attachment 2**.

All sediment and erosion mitigation measures included in the Sediment and Erosion Control Plan prepared by DRB Consulting Engineers will be implemented to prevent any sediment from leaving the site.

### 5.1.9 Visual Amenity and Aesthetics

The proposed premises are well placed further away from any residential dwelling and will be shielded from the public with the existing relatively dense industrialised estate, high buildings and existing topography. The existing landscaping strips maintained around most of the north-western, northern and eastern perimeter of the premises as part of the main mitigation measures will provide great visual protection to all potentially affected receptors.

In addition, a large noise wall installed along most of the eastern and south easter side of the premises provides great shielding between the facility and the residents on the other side of the railway lines.

### 5.1.10 Heritage and Archaeology

The site does not contain, nor is it located in proximity to, any item of heritage significance whether European heritage or Aboriginal cultural heritage. The site has previously been cleared of most vegetation and as such, no endangered flora, fauna, or ecological communities are present within or near the site.

**Schedule 5 – Part 3 Archaeological Sites** does not include any archaeological sites within or near the proposed premises.

Based on the above table, the following findings are noted:



- *No sites or objects of heritage values were found or identified within or adjacent to the site,*
- *No sites or objects of archaeological values were found or identified within or adjacent to the site.*

The activities to be conducted as part of the construction stage will have no impact on the identified heritage-related sites since they are too far away from the site/premise.

Notwithstanding the above, a comprehensive “***Unexpected Finds Protocol***” has been prepared to address any such finds and it is included in **Attachment 4**.

## 6. RELEVANT MITIGATION MEASURES AND COMMITMENTS

This section includes additional information dealing with specific mitigation measures that will be implemented during the construction stage.

### 6.1 MITIGATION MEASURES

Most mitigation measures for the construction stage were discussed in the EIS, RTS and revised RTS as they are similar to those that will be implemented for the operation stage of the facility. The following Sections will include relevant information to assist the reader in either referring to the relevant document or to use the information included in this CEMP.

**Table 6-1** below presents all management and mitigation measures to be implemented during the construction stage to ensure that the potential impacts on human health and environment are minimised.

**Table 6-1: Construction Related Management and Mitigation Measures**

| Aspect | Management and/or Mitigation Measures   |
|--------|---|
| Noise  | <ul style="list-style-type: none"> <li>➤ Toolbox and induction of personnel prior to shift to discuss noise control measures that may be implemented to reduce noise emissions to the community,</li> <li>➤ Implement any boundary fences/retaining walls as early as possible to maximise their attenuation benefits,</li> <li>➤ Where possible use mobile screens or construction hoarding to act as barriers between construction works and receivers,</li> <li>➤ All plant should be shut down when not in use. Plant to be parked/started at farthest point from relevant assessment locations,</li> <li>➤ Operating plant in a conservative manner (no over-revving),</li> <li>➤ Selection of the quietest suitable machinery available for each activity,</li> <li>➤ Avoidance of noisy plant/machinery working simultaneously where practicable,</li> <li>➤ Minimisation of metallic impact noises,</li> <li>➤ All plant is to utilise a broadband reverse alarm in lieu of the traditional high frequency type reverse alarm, and</li> <li>➤ Undertake letter box drops to notify receivers of potential works.</li> </ul> <p>Furthermore, working hours on site during construction are to be restricted to:</p> <ul style="list-style-type: none"> <li>➤ 7:00 am to 6:00 pm between Monday and Friday (or as specified by consent conditions),</li> <li>➤ 8:00 am to 1:00 pm on Saturday (or as specified by consent conditions),</li> <li>➤ Work shall not be undertaken on Sundays or public holidays.</li> </ul> <p>Australian Standard AS 2436-2010 “<i>Guide to Noise Control on Construction, Maintenance and Demolition Sites</i>” sets out numerous practical recommendations to assist in mitigating construction noise</p> |

| Aspect                               | Management and/or Mitigation Measures  |
|--------------------------------------|--|
|                                      | emissions.   |
| <b>Consultation and Notification</b> | <ul style="list-style-type: none"> <li>➤ maintain good communication between the community and site staff,</li> <li>➤ appoint a community liaison officer where required to maintain good communication between community and staff.</li> </ul>  |
| <b>Complaints Handling</b>           | <ul style="list-style-type: none"> <li>➤ provide a readily accessible contact point, of contact or complaints line and give complaints a fair hearing,</li> <li>➤ have a documented complaints process, including an escalation procedure so that if a complainant is not satisfied there is a clear path to follow,</li> <li>➤ records of all community complaints will be maintained on an up-to-date complaint register.<br/>The records will include: <ul style="list-style-type: none"> <li>- date and time of the complaint,</li> <li>- how the complaint was made (telephone, mail, or email),</li> <li>- any personal details of the complainant that were provided, or if no details are provided, a note to that effect,</li> <li>- the nature of the complaint,</li> <li>- any actions taken by the site supervisor/construction contractor in relation to the complaint, including any follow up contact with the complainant and the timing for implementing action, and</li> <li>- if no action was taken by site supervisor/construction contractor in relation to the complaint, the reason why no action was taken</li> </ul> </li> </ul>   |
| <b>Traffic</b>                       | <ul style="list-style-type: none"> <li>➤ directions and rules for engagement with mobile equipment,</li> <li>➤ directions for permitted and non-permitted methods of work on and around vehicles,</li> <li>➤ specifications for safety signs which shall be in place to support site controls,</li> <li>➤ specifications for PPE that shall be available and used by staff, visitors, and contractors on-site's traffic management map,</li> <li>➤ a summary of the hazard identification and risk assessment process used,</li> <li>➤ details of the process used to evaluate controls once they are in place, and</li> <li>➤ update traffic management plan in accordance with expansion, if required.</li> <li>➤ All heavy vehicles arriving to the site will require scheduling or pre-notification of arrival allowing for management of vehicle load. If the premises is at capacity, vehicles will be advised to delay their journey to the site. If vehicles arrive to site without scheduling and no capacity is available, they will be turned away.</li> <li>➤ Whilst on site, all vehicles are to abide by the traffic management system and undertake all listed procedures required</li> </ul> |
| <b>Community</b>                     | As part of its social responsibility, BRS posts letters to surrounding residents in the nearby residential area and neighbouring industrial facilities informing them of any updates regarding the operation or any solutions implemented.   |

| Aspect | Management and/or Mitigation Measures  |
|--------|--|
|        | Contact details will be displayed on the site entry and a complaints register is to be maintained noting the nature of the complaint, time received, action taken, and time the action was taken |

## 6.2 MONITORING PROGRAMS

Based on our extensive experience with environmental assessments of similar construction activities and the environmental assessments undertaken for BRS proposed activities, we believe that the potential of impact on the environment and human health during the construction stage is minimal. We believe that specific monitoring programs are not warranted since most proposed construction activities will be undertaken during normal construction hours and in enclosed spaces. Furthermore, the proposed small number of vehicle movements for the construction stage compared with the current number of vehicles, including a high percentage of heavy vehicles, using the nearby roads will have very little, if any, increase in traffic noise, dust emissions or exhaust gas emissions.

Notwithstanding the above, monitoring programs could be conducted when required only following an inquiry, a feedback or a complaint. These could be initiated by BRS staff, contractors, community and/or authorities.

### 6.2.1 Dust Monitoring Program

BRS management is confident that its activities will easily comply with any relevant consent conditions based on the assessments and observations made during the environmentally orientated inspections undertaken by a highly qualified environmental engineer. The assessments showed that implementing and maintaining the recommended mitigation measures would be sufficient to comply with all the Department (and EPA) air quality criteria at all times.

The potential dust emission impacts on residential areas within the vicinity of the subject site are insignificant due to the shielding between the site and residential areas, topography of the area and the minimal potential dust emissions from the construction activities beyond the boundaries of the subject site.

### 6.2.2 Noise Monitoring Program

As previously stated, we do not believe that a formal noise monitoring program is warranted but rather similar arrangements with the dust monitoring program are implemented, when required.

The potential noise impacts, as a result of the construction activities, on residential areas within the vicinity of the subject site are insignificant due to the shielding between the site and residential areas, topography of the area and the noise generated from existing industrial activities and traffic noise nearby.

The location/s of noise monitoring, if required, should be determined in consultation between Council, the Department, EPA, BRS and the environmental consultant.

## 7. CONSTRUCTION ENVIRONMENTAL MANAGEMENT PRACTICES AND PROCEDURES

As previously presented in this report, the potential environmental impacts of the construction activities are very minimal and will be limited to potential dust, noise and stormwater aspects only. Hence, in addition to the mitigation measures, amelioration strategies, protocols, regimes and monitoring requirements included in this CEMP, it is considered appropriate that one (1) additional procedure be prepared and implemented by relevant BRS staff. This procedure would form a vital component of the Construction Environmental Management Plan (CEMP) for the site.

This CEMP and the procedures it contains are designed to help staff and contractors carry out activities in the following ways:

- Provide prescriptive procedures where appropriate to minimise potential dust and noise nuisance and/or potential harm to human health and the environment,
- Provide guidelines for staff and contractors to enable them to assess and implement the best strategy to minimise potential dust, noise and stormwater impacts, and
- Increase construction related environmental awareness for the management, staff, contractors and visitors to the site.

The procedures included in this CEMP also assist management in the following ways:

- Identify events which have the potential to increase the risk of statutory breaches arising from dust, noise or stormwater pollution incidents, or to cause significant business interruptions,
- Provide guidelines for minimising the potential for dust, noise and stormwater impacts, and
- Establish, equip and train the staff and contractors that management can rely on with the capability of dealing with anticipated events effectively and efficiently.

The additional Management Procedure that is considered appropriate for inclusion in this CEMP is “**Workplace Inspection Procedure**” which is included in **Attachment 1**.

## 8. MONITORING OF ENVIRONMENTAL PERFORMANCE OF THE CONSTRUCTION ACTIVITIES

All construction activities will be monitored by implementing several strategies on the site. These strategies include:

- ❖ Workplace inspections conducted in accordance with the relevant procedure included in **Attachment 1** of this document,
- ❖ On-going program to record any detection of excessive dust emissions, water pollution, noise emissions by staff, visitors or contractors,
- ❖ On-going program to record any enquiries or requests by authorised officers of Government Departments,
- ❖ On-going program to record any enquiries, complaints or feedback from the community residing or present nearby
- ❖ Regular workplace audits/inspections by BRS delegated employees within the boundaries of the site,
- ❖ Regular walkabouts outside the boundaries of the site by BRS delegated employees,
- ❖ Review the results of any environmental monitoring undertaken as a result of concerns expressed by the community, authorities or others,
- ❖ Regular meetings and informal discussions with staff from both BRS and the contracting companies to gauge whether there are any environmental issues associated with the activities that are of concern to any person, and
- ❖ Review of all enquiries, feedback and complaints received from all stakeholders including staff members and contractors to ensure that any issues arise from the activities that are likely to cause any adverse impact on human health or the environment are dealt with promptly, effectively and efficiently.

We believe that the above strategies are more than adequate to give confidence to all parties that in the case of any breach of any Development Consent condition, environmental legislation requirements or policies/guidelines, the matter will be addressed promptly in an efficient and effective manner.

### 8.1 SCIENTIFIC METHODOLOGIES

As previously stated, based on the comprehensive EIS, RTS and revised RTS as well as this CEMP for the development, it was clearly demonstrated that the proposed activities could be undertaken with nil adverse impact on human health or the environment provided that the proposed mitigation measures and amelioration strategies are implemented on site. These measures and strategies are addressed in previous Sections of this document.

### 8.2 FEEDBACK AND COMPLAINT REGISTER

The establishment and implementation of a **Feedback and Complaint Register** will be of great assistance to all parties to determine whether the Construction Environmental Management plan and procedures are efficient and effective in minimising the impacts from the construction activities

and that the monitoring programs to be implemented on site are sufficient to determine compliances or exceedances.

The Register would be divided into two sections: **the Feedback Section and the Complaints Section.**

The Feedback Register would include the feedback given to BRS management in relation to all construction related matters including positive or negative feedback from staff, guests and authorised officers from government departments.

The Complaints Register would include the complaints lodged directly or indirectly with BRS management. These complaints could be made by different parties such as nearby residents, people working or are nearby, and Government Departments' employees.

We believe that the above monitoring strategies and the scientifically based monitoring programs that will be undertaken as required will be more than effective and sufficient to identify exceedances of any aspect associated with the activities. These monitoring strategies will guide BRS staff to identify the sources that are likely to cause the exceedances, if any, and to implement additional amelioration strategies and mitigation measures, if and when required.

### **8.3 NON-CONFORMANCES, CORRECTIVE & PREVENTATIVE ACTIONS**

All non-conformances are to be reported to BRS immediately.

Non-conformances, corrective and preventative actions are to be dealt with in accordance with the Corrective and/or Preventative Actions Procedure within the CEMP.

Non-conformances may include:

- Any non-compliance or release of contaminants not in accordance with the conditions of any consent, licence or approval,
- Any event where environmental harm has been caused or is likely to be caused, or
- Any spills of contaminants.

When non-conformity is identified, corrective action to mitigate the environmental impact should be put in place. Further investigation into the cause of the non-conformity would need to be undertaken to determine what preventative measures can be implemented to ensure the non-conformity does not recur.

The issuing of corrective actions shall be initiated by any of the following events, if considered justified:

- ❖ The Department, EPA, Council, Sydney Water or other regulatory agency direction or request,
- ❖ In-house detection of non-conformances, e.g., chemicals found to be stored outside designated areas,
- ❖ Housekeeping inspection verified non-conformance, or



- ❖ Public complaint.

## 8.4 INCIDENT MANAGEMENT

Environmental incidents include emissions and spillages (gas, liquid or solid) where any of the following apply if:

- There is a possibility of soil and groundwater contamination,
- There is any off-site environmental impact e.g., discharge to stormwater, dust, noise, air emissions,
- The involvement of authorities, media or the community is likely,
- The incident must be reported to the authorities,
- There are actual or potential losses of more than \$10,000 including fines, clean up and prevention (\$10,000 is defined as Material Harm to the Environment according to the POEO Act 1997),
- Any breach of the environmental conditions, including consent, licences, permits and other environmental regulation,
- Any complaints about environmental issues by an external party,
- Any fines and warning notices for consent, permit or licence non-compliance or regulatory breaches,
- Near misses with the potential to cause any of the above.

The Site Manager must be informed of any Environmental Incident as defined above. If the incident presents a material risk of harm, then the Notification of a Pollution Incident Procedure must be followed, and relevant regulatory authorities must be notified immediately.

Details of the incident must be recorded including:

- staff full name, address and telephone contact details
- date, time and duration of the incident
- the type of pollutant or a description of the incident
- discharge or emission location of the incident
- the extent or size of the area where the pollution is occurring
- anything else that is relevant to the incident

Records of the incident must be maintained on file and may be required to be provided to regulatory authorities.

## 9. ROLES AND RESPONSIBILITIES OF RELEVANT EMPLOYEES

The Site Manager is responsible for the implementation and maintenance of the CEMP throughout the activities to be conducted on site. The Site Manager may delegate the responsibility to other staff members who are appropriately trained to implement and maintain the CEMP.

The current Site Manager's details are:

Tim Baillie  
 Managing Director  
 Ph: (02) 8717 3333  
 Mobile: 0427 452 029  
 16 Kerr Road  
 Ingleburn NSW 2565  
 Email: [tim@bulkrecoverysolutions.com](mailto:tim@bulkrecoverysolutions.com)

The names of the delegated employees, if any, should be included in the relevant section of the CEMP when updated.

Management will need to ensure that those coming onto site have understood the relevance and objectives of the CEMP and will be carrying out their activities in accordance with the CEMP and relevant development consent conditions.

Having the full commitment of contractors and their staff is imperative to achieve the high level of success intended from the use of this CEMP.

Despite the fact that the Site Manager has the overall responsibility over all construction activities, he may determine that it will be more appropriate to delegate some roles and responsibilities to other employees, if considered appropriate. **Table 9-1** includes roles and responsibilities of relevant employees and contractors.

**Table 9-1: Roles and Responsibilities of Relevant Employees & Contractors**

| Role/Position                              | Responsibility  |
|--|---|
| Superintendent/<br>Construction<br>Manager | <ul style="list-style-type: none"> <li>• Ensure compliance with all applicable legal obligations including but not limited to this CEMP</li> <li>• Ensure all project staff understands all environmental requirements relevant to their area/scope of work.</li> <li>• Ensure all project staff is competent to undertake their duties including fulfilment of the general environmental duty, with regard to appropriate education, training and experience.</li> <li>• Take action in the event of a pollution incident and allocate the required resources to minimise environmental impact.</li> <li>• Ensure non-conformances are identified, recorded and reported and that required corrective and remedial actions are implemented.</li> </ul> |

| Role/Position             | Responsibility  |
|---------------------------|---|
|                           | <ul style="list-style-type: none"> <li>Report any activity that has resulted, or has the potential to result, in an environmental incident to the Site Manager immediately</li> </ul>   |
| Environmental Manager     | <ul style="list-style-type: none"> <li>Implement and maintain this CEMP.</li> <li>Coordinate and authorise environmental work and site level plans.</li> <li>Coordinate and conduct regular inspections to ensure a high level of environmental performance and compliance with the CEMP.</li> <li>Provide technical advice regarding environmental obligations, measures and safeguards.</li> </ul>  |
| All Staff and Contractors | <ul style="list-style-type: none"> <li>Comply with the requirements of applicable environmental legislation and environmental authorities including the specific requirements of the project approvals and supporting documentation</li> <li>Undertake all activities in an environmentally responsible manner</li> <li>Undertake all activities in accordance with the agreed environmental management plans including this CEMP and procedures.</li> <li>Identify and report any non-conformances.</li> <li>Ensure awareness of the contact person regarding environmental matters and report any activity that has resulted in or has the potential to result in environmental harm immediately.</li> <li>Ensure attendance at any environmental training provided relevant to their role and responsibilities.</li> </ul> |

## **10. COMMUNITY CONSULTATION AND COMPLAINTS HANDLING PROCEDURES**

Due to the nature of the standardised and limited proposed construction activities scheduled to be conducted on site and the minimal potential of pollution generated by these activities, it is highly unlikely that complaints would be received from people located outside the boundaries of the site and that only feedback from people who are either working or inspecting the activities within the boundaries of the site, would be received. This means that only internal communications system would be sufficient, however, BRS management will proactively participate in voluntary and open communications with relevant stakeholders, when required. Stakeholders include community groups, contractors, NSW regulatory authorities and non-regulatory agencies. This is the main reason for establishing both a Feedback Register and a Complaint Register. Both registers will incorporate all related activities during the construction stage of the development.

### **10.1 COMMUNITY RELATIONS**

A procedure has been developed for communicating with the residential community in a manner that highlights the site operator's concern for both their amenity and the local environment. This also ensures that any enquiries or complaints are effectively logged and actioned. This will be established with the Complaints and Feedback Register (included in this plan).

### **10.2 COMMUNICATIONS WITH REGULATORY AUTHORITIES**

Communications with regulatory authorities, such as DPIE, shall occur on an as needs basis for the compliance with consent conditions. All communications with regulatory authorities concerning environmental matters are to be noted and records of any subsequent actions appropriately filed.

A typical method of reporting would be monthly environmental review to include all environmental monitoring for the site during the construction stage. Records and documentation resulting from the implementation of the CEMP, such as inspection forms, records and community complaints should also be included in the monthly reporting.

Site management would also be required to report to regulatory authorities for any additional reporting and/or testing requirements requested. This will be established on an as needs basis, upon issue of a notice or a request.

### **10.3 INTERNAL COMMUNICATION**

The site management is to establish simple yet effective communication channels for an effective implementation of the overall environmental management system. Typical methods of communication that may suit the size of the operation include meetings and notice boards and the use of toolbox sessions which are highly effective. Currently, the site management upholds an existing internal communication strategy, and are also utilising verbal communication as the most effective method, given the size of the site and the proposed construction activities.

Document control and written communication would be necessary when new contractors or employees are trained, or changes are made to the CEMP or any other matters that affect the holistic Environmental Management of the site during the construction stage.

## **11. REVIEW OF THE CEMP AND CONTINUAL IMPROVEMENT**

This section provides information associated with the review and continual improvement of the CEMP during the construction stage of the development.

### **11.1 REVIEW OF THE CEMP**

The CEMP should be reviewed by the Site Manager or another delegated employee who is trained appropriately to be able to undertake this task effectively and efficiently. The review should be conducted in consultation with the site supervisors as well as the contractors undertaking specific jobs to ensure that it accurately reflects the construction activities when the review is conducted. The review should also be undertaken in consultation with the Department to ensure that the CEMP continues to meet the Development Consent requirements and the Department expectations.

The review of the CEMP should be conducted as follows:

- At least once every month during the construction stage
- When it is considered necessary depending on certain changes such as changes in staffing arrangements that are relevant to the CEMP, changes in construction activities that may have the potential to impact on the CEMP and/or changes in contractors' activities on site.

### **11.2 CONTINUAL IMPROVEMENT**

Continual improvement of the CEMP will be achieved by the continual evaluation of Construction Environmental Management performance against environmental legislation, policies, statutory instruments and objectives for the purpose of identifying any opportunities for improvement.

The continual improvement process could occur at any time depending on certain circumstances such as changes in activities.

Outcomes of these reviews shall be documented and retained for the duration of the construction stage.

## 12. TRAINING

BRS recognises that training and awareness are an integral part of the implementation of this Construction Environmental Management Plan.

BRS management would provide appropriate training to the Site Manager, if it is considered necessary, as it will all depend on his previous experiences with similar duties. The training would include the implementation and maintenance of the CEMP to ensure that the Site Manager is competent and confident in carrying out the duties and responsibilities associated with the CEMP.

In addition, the training would include a session on undertaking prompt action to manage the daily activities in the case that a feedback was provided, an enquiry was made, or a complaint was received. The prompt action is required to ensure that any potential impact on human health or the environment is minimised.

It is essential that the site management thoroughly understands the contents of this CEMP and be competent in the objectives, consent conditions, applicable legislation, the environmental aspects and impacts of all construction activities and the procedures.

Therefore, site management will determine the level of competency necessary for staff and contractors coming to site to ensure their environmental objectives and statutory responsibilities are met.

Training will need to be assessed on a periodic basis for staff while contractors would be assessed on a job-by-job basis. All relevant procedures should be discussed until a level of understanding has been reached and a degree of competency has been demonstrated by the staff member or contractor involved to the site operator's satisfaction.

Shortfalls could be addressed by specific on-site training. Updates and reviews should also be conducted in the case of complaints or after any changes in the CEMP, in particular, a change in management, procedures, site operations or legislation.

## 13. LIMITATIONS

Our services for this report are carried out in accordance with our current professional standards for the preparation of Construction Environmental Management Plans. No guarantees are either expressed or implied.

This Construction Environmental Management Plan has been prepared solely for the use of Bulk Recovery Solutions Pty Ltd (BRS), as per our agreement for providing environmental services. Only BRS is entitled to rely upon the information provided in this report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this report, no warranty is given, nor liability accepted (except what otherwise is required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by BRS for the purposes of preparing this report.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.



## 14. REFERENCES

1. Protection of the Environment Operations Act 1997
2. Protection of the Environment Operations (General) Regulation 2009
3. Protection of the Environment Operations (Waste) Regulation 2014
4. Environmental Planning & Assessment Act 1979
5. Environmental Planning and Assessment Regulation 2000
6. NSW EPA – Noise Policy for Industry 2017
7. NSW DEC (EPA) Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales – August 2005
8. NSW DEC (EPA) Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales – January 2007
9. NSW DEC (EPA) Technical framework: Assessment and management of odour from stationary sources in NSW – November 2006
10. Campbelltown Local Environmental Plan 2015
11. Campbelltown Development Control Plan 2015
12. Guideline for the Preparation of Environmental Management Plans published by the Department of Infrastructure, Planning and Natural Resources in 2004.



**Attachment 1 – BRS Construction Workplace Inspection Procedure**



# BRS Construction Workplace Inspection Procedure

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PROCEDURE NO. 211603.1

DATE: 05/07/2021

PREPARED BY: Environmental Risk Assessors Pty Ltd REVISION NO:1

SUBJECT: Construction Workplace Inspection Procedure

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## 1. PURPOSE

The purpose of this procedure is to set out the process relating to Workplace Inspections of Bulk Recovery Solutions Pty Ltd Resource Recovery facility in relation to the organisation's construction activities aspects.

## 2. RESPONSIBILITIES

- Site Manager/Construction Manager
- All staff and contractors of BRS
- Environmental Manager

## 3. REFERENCES

- Protection of the Environment Operations Act 1997 and Subordinate Regulations
- Environmental Planning and Assessment Act 1979 and Subordinate Regulations

## 4. DEFINITIONS

### **Workplace Inspections**

Inspections conducted by the Site Manager, a delegated BRS employee or Environmental Manager using the construction environmental checklist provided to assess the housekeeping standards of the facility to ensure compliance with relevant Development Consent conditions and relevant legislation.

### **Environmental Harm**

Any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above includes any act or omission that results in pollution. (Ref: POEO Act).

### **Due Diligence**

The systematic identification of the environmental risks and liabilities associated with the organisation's construction activities.

## 5. PROCEDURE

- A sample Workplace Inspection Checklist is provided below to be completed and recorded on a fortnightly basis. This information is used to check compliance and ensure due diligence. It is

also used to determine whether action must be taken to rectify construction activities related matters that have arisen and may have the potential to cause harm to the environment or human health. This checklist must be updated to correctly reflect specific site requirements when construction activities are modified.

- The Site Manager/Construction Manager is responsible for ensuring that any actions required are implemented. The appropriate column of the checklist to indicate that these actions have been adequately undertaken is also the responsibility of the Site Manager or delegate/s.
- The Workplace Inspection must cover all active working areas including:
  - ▶ The incoming material loading, unloading, stockpiling and storage areas,
  - ▶ External areas including car parking areas, roadways, stormwater drains and boundaries,
  - ▶ Excavated areas, if any,
  - ▶ Waste storage areas, and
  - ▶ Construction office areas and amenities, if different from existing ones.
- The Workplace Inspection Checklist must be updated as required. Site management may prefer to update the checklist, so it is more specific to each area.

## **6. RECORDS**

All records of Workplace Inspections and any corrective actions (if required) must be maintained at least until the completion of the construction stage.

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**SUBJECT: CONSTRUCTION WORKPLACE INSPECTION CHECKLIST**

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|  |            |                    |                |
|--|------------|--------------------|----------------|
| <b>Area:</b> _____   |            | <b>Date:</b> _____ |                |
| <b>ITEM CHECKED</b>  | <b>YES</b> | <b>NO</b>          | <b>DETAILS</b> |
| Are all staff trained in the activities' management awareness?   |            |                    |                |
| Is there any excessive or unusual dust present?  |            |                    |                |
| Is all waste stored appropriately to minimise harm to human health or the environment?                         |            |                    |                |
| Are all erosion and sediment controls in place and well maintained?  |            |                    |                |
| Are all areas well managed to prevent the generation of dust?  |            |                    |                |
| Is any environmental documentation missing from display – signage, policy, emergency plan, MSDS register etc.? |            |                    |                |
| Is any firefighting equipment missing, blocked from easy access or not been serviced in the past 6 months?     |            |                    |                |
| Are safety signs visible and in good condition?  |            |                    |                |
| Are any containers or items not in the correct location?   |            |                    |                |
| Do the active working areas appear to be well managed and in normal working order?                             |            |                    |                |

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**SUBJECT: CONSTRUCTION WORKPLACE INSPECTION CHECKLIST**

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Housekeeping      **Exceptional**      **Good**      **Average**      **Poor**      **Very Poor**  
(circle):

**Comments / Actions Required:**

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|                  |                 |
|------------------|-----------------|
| <hr/>            | <hr/>           |
| <b>Name</b>      | <b>Position</b> |
| <hr/>            | <hr/>           |
| <b>Signature</b> | <b>Date</b>     |



**Attachment 2 – BRS CEMP Erosion and Sediment Control Plan**





# PROPOSED CIVIL WORKS

## 16 KERR ROAD, INGLEBURN

### GENERAL NOTES

- THESE DRAWINGS SHOULD BE READ IN CONJUNCTION WITH ALL ARCHITECTURAL AND CONSULTANT DRAWINGS PREPARED FOR THE PROPOSED DEVELOPMENT, PARTICULARLY THE HYDRAULIC ENGINEERING DRAWINGS. ANY DISCREPANCIES SHOULD BE BROUGHT TO THE ATTENTION OF THE PROJECT MANAGER / OWNER BEFORE PROCEEDING WITH THE WORK.
- ALL WORKMANSHIP SHALL BE IN ACCORDANCE WITH THE CIVIL ENGINEERING DRAWINGS AND NOTES, LOCAL COUNCIL REQUIREMENTS AND SPECIFICATIONS AND RELEVANT AUSTRALIAN STANDARDS.
- THE DRAWINGS HAVE NOT BEEN PREPARED FOR SETOUT AND SHOULD NOT BE SCALED. THE BUILDER SHOULD SET OUT THE PROPOSED WORKS USING THE DRAWINGS AS REFERENCE.
- SEDIMENT AND EROSION CONTROL MUST BE INSTALLED PRIOR TO THE COMMENCEMENT OF WORK. SEDIMENT AND EROSION CONTROL SHOULD BE IMPLEMENTED IN ACCORDANCE WITH LOCAL COUNCIL GUIDELINES. WHERE RELEVANT GUIDELINES ARE NOT AVAILABLE, REFERENCE SHOULD BE MADE TO LANDCOM'S MANAGING URBAN STORMWATER, SOILS AND CONSTRUCTION (THE BLUE BOOK).
- DURING CONSTRUCTION, ALL STRUCTURES AND SERVICES WITHIN THE VICINITY OF THE WORKS SHOULD BE MAINTAINED IN A STABLE CONDITION. TEMPORARY SUPPORT OF ANY STRUCTURES IS THE BUILDERS RESPONSIBILITY.
- ALL WORK IS TO BE CARRIED OUT IN ACCORDANCE WITH ALL WHS AND OHS SAFETY REQUIREMENTS.
- CONSTRUCTION MUST NOT COMMENCE UNTIL APPROPRIATE APPROVALS HAVE BEEN OBTAINED AND A CONSTRUCTION CERTIFICATE ISSUED BY THE RELEVANT AUTHORITY.
- WHERE NEW WORK TIES IN TO EXISTING STRUCTURE, ENSURE A SMOOTH TRANSITION IS ACHIEVED ON COMPLETION OF THE PROJECT. WHERE THIS DOESNT APPEAR TO BE POSSIBLE, CONSULT WITH THE PROJECT TEAM IMMEDIATELY.
- REFER TO ARCHITECTS PLAN FOR TREES TO BE RETAINED AND PROTECTED.

### EARTHWORKS / GROUND PREPARATION:

- EXCAVATION AND GROUND PREPARATION SHALL BE CARRIED OUT IN ACCORDANCE WITH THE SITE SPECIFIC GEOTECHNICAL ENGINEERS REQUIREMENTS
- WHERE SITE SPECIFIC GEOTECHNICAL INFORMATION IS NOT AVAILABLE, GROUND PREPARATION SHOULD BE IN ACCORDANCE WITH THE LATEST VERSION OF AS3798, AND COULD BE GENERALLY SUMMARISED AS BELOW:
  - STRIP ALL TOPSOIL, LOOSE AND DELTERIOUS MATERIAL AND CUT SITE TO BULK EXCAVATION LEVELS.
  - PROOF ROLL SUBGRADE IN ACCORDANCE WITH AS3798 (OR UNDER DIRECTION OF A GEOTECHNICAL CONSULTANT) TO IDENTIFY ANY WET, SOFT OR UNSUITABLE MATERIAL.
  - UNSUITABLE MATERIAL (SOFT SPOTS) SHALL BE OVEREXCAVATED AND REPLACED WITH APPROVED SELECT MATERIAL.
  - WHERE FILLING IS REQUIRED, PLACE IN MAXIMUM 200mm LOOSE THICKNESS LAYERS AND COMPACT TO 98% MIN STD DENSITY INDEX (CLAY) OR 80% MIN DENSITY INDEX (SAND) AT +/-2% OPTIMUM MOISTURE CONTENT.
  - TESTING OF SUBGRADE TO BE LEVEL 1 UNDER BUILDING PLATFORMS AND LEVEL 2 ELSEWHERE WITH FREQUENCY OF TESTING AS SPECIFIED IN TABLE 8.1 OF AS3798.
- IF SUBGRADE IS NOT ABLE TO BE COMPACTED APPROPRIATELY TO THE LEVELS SPECIFIED (WET OR OTHERWISE) A GEOTECHNICAL ENGINEER SHOULD BE CONSULTED FOR ADVICE.
- THE CONTRACTOR MAY USE SITE WON MATERIAL FROM EXCAVATIONS IN FILLING AS DIRECTED BY THE SITE GEOTECHNICAL ENGINEER. WHERE THIS MATERIAL IS CONSIDERED UNSUITABLE, OR ADDITIONAL MATERIAL IS REQUIRED, SELECT FILL MATERIAL SHOULD BE IMPORTED. IMPORTED FILL MATERIAL SHALL HAVE A MAXIMUM PARTICLE SIZE OF 50mm, 80% PARTICLES PASSING THE 37.5mm SIEVE, 15% PARTICLES PASSING THE 75 MICRON SIEVE AND A PLASTICITY INDEX BETWEEN 2% AND 15%.
- EXCAVATIONS SHOULD BE BETWEEN 0mm AND -25mm BELOW THE DOCUMENTED DESIGN LEVELS. ANY EXTRA MATERIAL REQUIRED DUE TO OVER EXCAVATION SHALL BE PROVIDED AT THE CONTRACTORS COST.
- ENSURE THAT ALL EARTHWORKS ARE FREE DRAINING AND DO NOT POND WATER. AREAS WHERE RUNOFF CANNOT BE DRAINED VIA GRAVITY, TEMPORARY DRAINAGE OR SUMP PUMPS SHOULD BE IMPLEMENTED.
- ANY CONTAMINATED MATERIAL IDENTIFIED MUST BE ADVISED TO THE SITE SUPERVISOR FOR DIRECTION.

### STORMWATER AND SUBSOIL DRAINAGE

- SELECTION AND INSTALLATION OF PITS, PIPES, TANKS AND TRENCHED SHALL BE IN ACCORDANCE WITH THE CURRENT EDITION OF AS3500, LOCAL AND STATUTORY REQUIREMENTS.
- ALL PIPES SHOULD BE SEWER GRADE (SN4-6) uPVC OR CLASS 2 RUBBER RING JOINTED RCP/FRP PIPE AND LAID AT A MINIMUM GRADE OF 1% (UNO).
- ALL STORMWATER PITS SHALL BE CAST INSITU REINFORCED CONCRETE OR PRECAST CONCRETE STORMWATER DRAINAGE PITS (UNO).
- DRB CONSULTING ENGINEERS TO BE ADVISED IF ANY EXISTING STRUCTURES ARE WITHIN THE ZONE OF INFLUENCE OF AN EXCAVATION, INCLUDING TRENCHING.
- LOAD CLASS FOR COVERS/GRATES SHALL BE IN ACCORDANCE WITH AS3996.
- MATERIAL USED FOR BEDDING AND BACKFILLING OF PIPES SHALL BE APPROVED NON-COHESIVE GRANULAR MATERIAL.
- ALL IMPERVIOUS SURFACES SHALL BE FREE DRAINING AND HAVE A SMOOTH TRANSITION TO PROPOSED STORMWATER PITS.
- SUBSOIL DRAINAGE LINES SHALL BE COMPLETE WITH NON-WOVEN GEOTEXTILE SOCK AND CONNECTED TO THE STORMWATER DRAINAGE NETWORK AT A MINIMUM GRADE OF 1%. A SEALED uPVC PIPE SHALL BE USED WHERE SUBSOIL DRAINAGE LINES PASS BENEATH IMPERVIOUS PAVEMENT AREAS.
- SUBSOIL DRAINAGE LINES SHALL BE PROVIDED:
  - BEHIND ALL PROPOSED RETAINING WALLS,
  - WITHIN ALL PLANTER BEDS AND GARDEN BEDS, AND
  - ALL LOCATIONS SHOWN ON THE CIVIL DRAWINGS.
- PROVIDE A 3m SUBSOIL 'TAG' ON THE UPSTREAM SIDE OF ALL STORMWATER PITS. THE 'TAG' SHALL BE WITHIN THE BASE OF THE INLET PIPE TRENCH.

### FOUNDATIONS

- FOOTINGS HAVE BEEN DESIGNED TO BE SUPPORTED BY FIRM NATURAL CLAY MATERIAL WITH A MINIMUM ALLOWABLE SOIL BEARING PRESSURE OF 250KPA. DRB CONSULTING ENGINEERS MUST BE CALLED TO INSPECT, AND CONFIRM, ADEQUATE FOUNDATION MATERIAL HAS BEEN ACHIEVED PRIOR TO PLACING CONCRETE. PIERS MAY BE REQUIRED.
- FOOTING EXCAVATIONS ARE TO BE CLEANED AND FREE OF ALL LOOSE MATERIAL OR DEBRIS. IF SOFT FOUNDATION MATERIAL IS IDENTIFIED, DRB IS TO BE CONTACTED IMMEDIATELY.
- CONCRETE MUST BE POURED AS SOON AS POSSIBLE AFTER EXCAVATION. IF EXCAVATIONS REMAIN OPEN FOR LONGER THAN 24 HOURS, OR IF RAIN IS LIKELY TO BE ENCOUNTERED, A BLINDING LAYER OF CONCRETE SHALL BE PLACED TO PROTECT THE FOUNDATION BASE.

### CONCRETE

- ALL WORKMANSHIP AND MATERIALS TO BE IN ACCORDANCE WITH AS3600.
- USE TYPE 'GP' CEMENT UNLESS OTHERWISE SPECIFIED.
- CONCRETE SHALL BE 32MPA FOR DRIVEWAY PAVEMENTS AND N25 MPA FOR FOOTPATH PAVEMENTS (UNO).
- CONCRETE TO HAVE A MAXIMUM AGGREGATE SIZE OF 20mm AND SLUMP OF 80mm.
- ALL CONCRETE TO BE MECHANICALLY VIBRATED DURING CONSTRUCTION TO ACHIEVE ADEQUATE COMPACTION.
- ALL CONCRETE TO BE CURED IN ACCORDANCE WITH AS3600.
- ALL REINFORCEMENT BARS SHALL BE GRADE D500N TO AS 4671 AND ALL MESH SHALL BE GRADE 500L TO AS4671.
- WELDING OF REINFORCEMENT WILL NOT BE PERMITTED.
- HOOKS, BENDS, SPLICES AND LAPS SHALL BE IN ACCORDANCE WITH AS3600. AT SPLICES FABRIC SHALL BE LAPPED IN ACCORDANCE WITH AS3600 SECTION 13.
- ONLY USE PLASTIC OR CONCRETE CHAIRS IN EXTERNAL AREAS.

### PAVEMENT

- MATCH NEW PAVEMENTS NEATLY AND FLUSH WITH EXISTING WHERE REQUIRED.
- PROVIDE CERTIFICATES VERIFYING THE QUALITY OF ALL IMPORTED MATERIAL FOR APPROVAL.
- NO CONCRETE TO BE POURED ON DAYS FORECAST TO BE GREATER THAN 30 DEGREES CENTIGRADE. CONCRETE POURS IN CONDITIONS OF HIGH TEMPERATURE OR HIGH WIND MAY LEAD TO EXCESSIVE CRACKING.
- COMPACTION:
  - SUBBASE 95% MODIFIED
  - SUBGRADE 100% STANDARD / 75% RELATIVE
- TESTING OF SUBGRADE TO BE UNDERTAKEN BY N.A.T.A. REGISTERED LABORATORY.



SOURCE: SIX Maps 2021

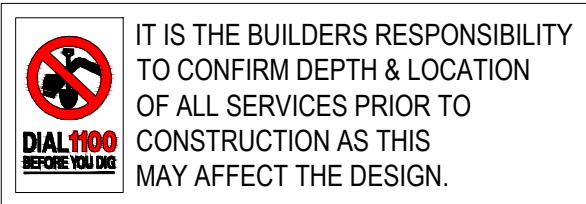
### LOCALITY PLAN

NTS

### DRAWING SHEETS

180009.CIV000  
180009.CIV100

CONSTRUCTION NOTES, LOCALITY PLAN & DRAWING LIST  
EROSION & SEDIMENT CONTROL PLAN



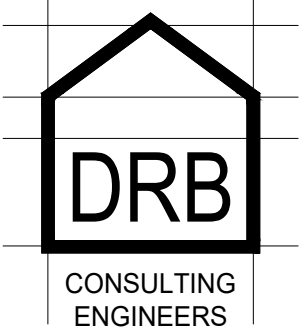
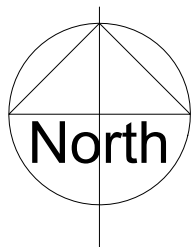
IT IS THE BUILDERS RESPONSIBILITY TO CONFIRM DEPTH & LOCATION OF ALL SERVICES PRIOR TO CONSTRUCTION AS THIS MAY AFFECT THE DESIGN.

This drawing is not approved for construction unless signed.

*Matthew McLennan*

Matthew McLennan  
BEing (Civil) Hons MIE (Aust)

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CONSTRUCTION NOTES, LOCALITY PLAN  
& DRAWING LIST PLAN  
16 KERR ROAD,  
INGLEBURN

DRAWING STATUS

FOR CONSTRUCTION

PROJECT REF No.  
180009

DRAWING No.  
CIV000

SHEET SIZE

A1

SCALE

-

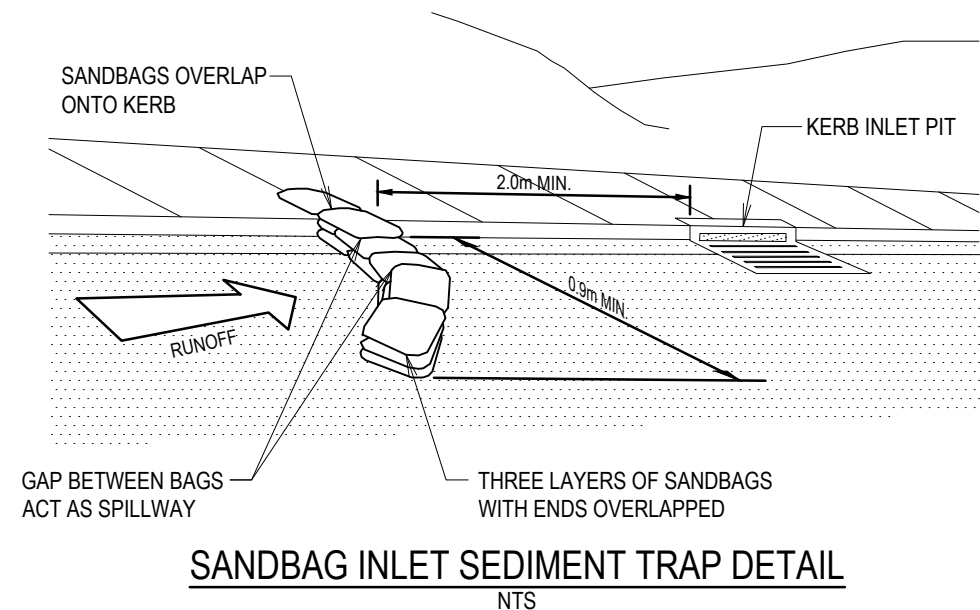
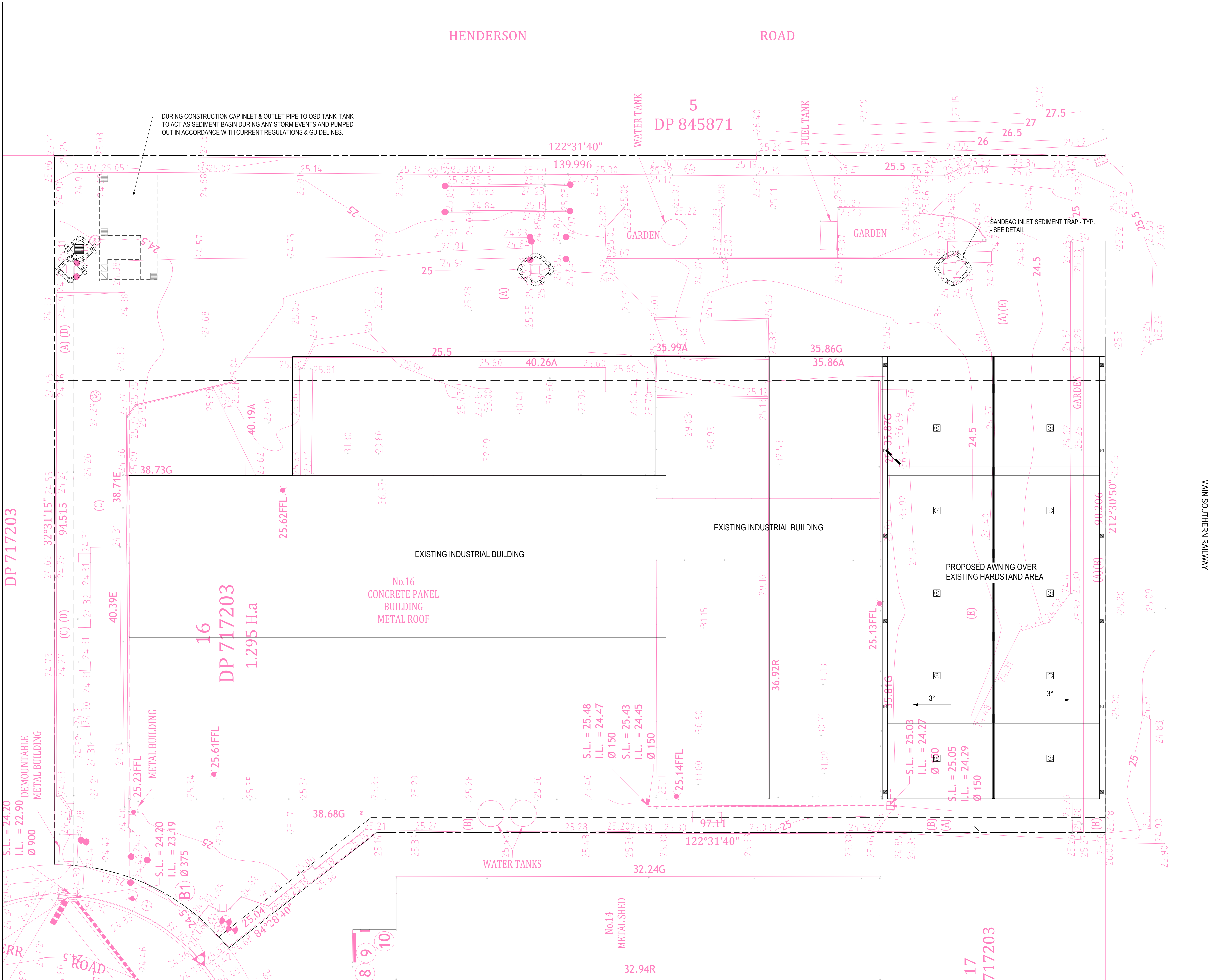
REVISION

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REVISIONS

| REV | DATE     | DRN  | CHK  | APP  | DRAWING STATUS |
|-----|----------|------|------|------|----------------|
| 0   | 01.07.21 | R.F. | M.M. | M.M. | ISSUED FOR CC  |






THIS 'BLUE BOOK' DETAIL IS TO BE MODIFIED TO SUIT THE SANDBAG ARRANGEMENTS SHOWN ON THE PLAN

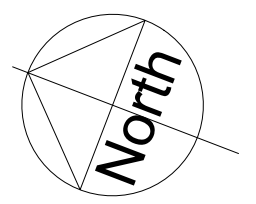
| REVISIONS |          |      |      |      |                |
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| REV       | DATE     | DRN  | CHK  | APP  | DRAWING STATUS |
| 0         | 01.07.21 | R.F. | M.M. | M.M. | ISSUED FOR CC  |


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EROSION & SEDIMENT CONTROL PLAN  
16 KERR ROAD,  
INGLEBURN

| DRAWING STATUS   |  | SHEET SIZE |
|------------------|--|------------|
| FOR CONSTRUCTION |  | A1         |
| PROJECT REF No.  |  | SCALE      |
| 180009           |  | 1:250      |
| DRAWING No.      |  | REVISION   |
| CIV100           |  | 0          |

**Attachment 3 – BRS Construction Complaints Handling Procedure**



# BRS Construction Complaints Handling Procedure

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**PROCEDURE NO.** 211603.2

**DATE:** 05/07/2021

**PREPARED BY:** Environmental Risk Assessors Pty Ltd **ISSUE NO:** 1

**SUBJECT:** Construction Complaints Handling Procedure

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The purpose of this procedure is to ensure that a “complaints oriented” process is in place to focus on the type, date, time and origin of the complaint, together with “feedback” to the complainant regarding (if appropriate) investigation of the complaint and any remedial action arising from the complaint.

Public complaints registers are to be maintained in a separate document titled “Complaints Register”.

## 1 Procedure

- Complete the Complaint Response Form. The following information is mandatory:
  - ▶ Name of complainant,
  - ▶ Location of complainant,
  - ▶ Date and time of complaint,
  - ▶ Weather conditions prevailing at the time of complaint,
  - ▶ Any process operations existing at the time of complaint, and
  - ▶ Telephone Number.
- Complaint investigated by site management or staff and action appropriate to the circumstances taken.
- Advise DPIE (and EPA), if required.

Appropriate actions may include, but not limited to the following:

- Investigation into the mobile plant movements during the period in question. If mobile plant movements were in breach of the Construction Environmental Management Plan, remedial action must be taken e.g. inform the vehicle driver(s) of the breach of site conditions and request compliance in the future.
- Where complaints relate to excessive dust emissions (or offensive noise):
  - ▶ Advise the complainant that investigation will be initiated immediately and ask the complainant to note the time and nature of the dust or noise when the issue reoccurs.
  - ▶ From the time the complaint is lodged, conduct regular weather monitoring (use The Site Climate Record form) so that upon reoccurrence of the issue, the weather conditions can be checked to confirm the likelihood of the dust (or noise) generated from site to cause the complaint.
  - ▶ If the likelihood is high, appropriate tests/measurements at the location specified by the complainant as being the possible cause of the complaint (similar time of day) can be conducted. Compare results with previous tests/measurements (if available) and where an increase has occurred, further investigate sources, recommend remedial action for the preparation of an action plan to rectify the problem on a long-term basis.

- On completion of the Action Plan ensure that the complainant is fully informed of remedial measures and that the Complaint Register updated.



## COMPLAINTS & FEEDBACK REGISTER

[illegible]

**BRS – ENVIRONMENTAL COMPLAINT RESPONSE FORM**

REF: 01

REV: 1

PAGE 1 OF 2

COMPLAINT REGISTER REFERENCE NO: .....

DATE: ..... TIME: .....AM/PM

COMPLAINTS RECEIVED BY: .....

NAME OF COMPLAINANT: ..... TELEPHONE NO:.....

ADDRESS: .....

---

**DETAILS OF COMPLAINT:**

DATE OF OCCURENCE: ..... TIME AM/PM: .....

WEATHER DATA CHECK: Estimate weather conditions from observed Site Climate Records or Meteorological data from a relevant Bureau of Meteorology Station.

Where L/M/S = Low/Medium/Strong, and Wind direction is monitored on an 8 points scale of N, NE, E, SE, S, SW, W, NW.

| External<br>Temp °C | Rel. Humidity<br>(%) | Wind<br>Direction | Wind Speed<br>L/M/S | Odour<br>L/M/S | Equipment<br>Condition |
|---------------------|----------------------|-------------------|---------------------|----------------|------------------------|
|                     |                      |                   |                     |                |                        |

LOCATION OF THE EVENT: .....

PROCESS OPERATIONS AT TIME OF COMPLAINT .....:

PARTICULAR DETAILS RELATING TO THE COMPLAINT: .....

.....

**CORRECTIVE AND PREVENTATIVE ACTION:**

COMPLAINT INVESTIGATED BY: .....

RESULTS OF INVESTIGATION: .....

.....

.....

.....

.....

.....

.....

ON COMPLETION OF CORRECTIVE AND PREVENTATIVE ACTION:

LETTER SENT TO COMPLAINANT      YES      NO      N/A      DATE: .....

WORK PRACTICE MODIFIED      YES      NO      N/A      DATE: .....

**COMPLAINT RESPONSE COMPLETED:** .....

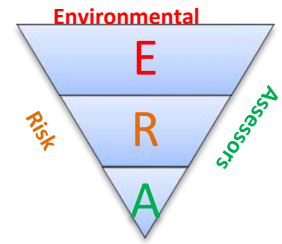
PRINT NAME

SIGNATURE: .....

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**Attachment 4 – BRS CEMP Unexpected Finds Protocol**





**Unexpected Finds Protocol  
Bulk Recovery Solutions Pty Ltd  
16 Kerr Road, Ingleburn NSW  
SSD 8593**

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**Prepared for:** Department of Planning, Industry and Environment  
Bulk Recovery Solutions Pty Ltd

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## **ABBREVIATIONS & GLOSSARY OF TERMS**

|                           |   |
|---------------------------|---|
| <b>AS</b>                 | Australian Standard   |
| <b>AWS</b>                | Automatic Weather Station   |
| <b>BCA</b>                | Building Code of Australia  |
| <b>BRS</b>                | Bulk Recovery Solutions Pty Ltd                                     |
| <b>CEMP</b>               | Construction Environmental Management Plan                          |
| <b>Consent</b>            | Development Consent SSD 8593  |
| <b>Council</b>            | Campbelltown City Council   |
| <b>DEC</b>                | NSW Department of the Environment and Conservation                  |
| <b>DECC</b>               | NSW Department of Environment and Climate Change                    |
| <b>Department</b>         | Department of Planning, Industry and Environment                    |
| <b>EPA</b>                | Environment Protection Authority                                    |
| <b>EP&amp;A Act</b>       | Environmental Planning and Assessment Act 1979                      |
| <b>EPBC Act</b>           | Environment Protection and Biodiversity Conservation Act 1999       |
| <b>Heritage Act</b>       | NSW Heritage Act 1977   |
| <b>NPW Act</b>            | NSW National Parks and Wildlife Act 1974                            |
| <b>NSW</b>                | New South Wales   |
| <b>OEH</b>                | Office of Environment and Heritage                                  |
| <b>Planning Secretary</b> | Secretary of the Department of Planning, Industry and Environment   |
| <b>POEO Act</b>           | Protection of the Environment Operations Act 1997                   |
| <b>RRF</b>                | Resource Recovery Facility  |
| <b>SEPP</b>               | State Environmental Planning Policy                                 |
| <b>Site</b>               | 16 Kerr Road, Ingleburn NSW 2565                                    |
| <b>SSD</b>                | State Significant Development                                       |
| <b>tpa</b>                | Tonnes Per Annum  |
| <b>Waste</b>              | As defined in the Protection of the Environment Operations Act 1997 |

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# 1 INTRODUCTION

Environmental Risk Assessors Pty Ltd was engaged by Tim Baillie, Managing Director of Bulk Recovery Solutions Pty Ltd (BRS) to prepare an Unexpected Finds Protocol (UFP) to ensure compliance with specific requirements included in relevant conditions of Development Consent No SSD 8593 (Consent) which was issued by the Department of Planning, Industry and Environment (Department) to BRS on 26 May 2021. However, it was considered appropriate to address other conditions that are associated with the Unexpected Find matters. It should be noted that the UFP is required to be included in the Construction Environmental Management Plan (CEMP) and therefore it does not apply to the operational stage of the development. The Consent applies to site located at 16 Kerr Road, Ingleburn within the Campbelltown City Council Local Government Area.

## 1.1 DEVELOPMENT CONSENT REQUIREMENTS

Following review of the Development Consent No SSD 8593, we understand that the conditions outlined below are considered to be relevant for the Unexpected Finds and must be addressed in this document.

### **Condition B33 states:**

#### **ABORIGINAL HERITAGE**

##### ***Unexpected Finds Protocol***

*B33. If any item or object of Aboriginal heritage significance is identified on site:*

- (a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately;*
- (b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and*
- (c) Heritage NSW must be contacted immediately.*

*B34. Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974.*

### **Condition B40 states:**

#### **CONTAMINATION**

##### ***Unexpected Finds***

*B40. Prior to the commencement of construction for the development, the Applicant must prepare an unexpected finds procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition C2 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.*

### **Condition C3 states:**

## **CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

C2. *The Applicant must prepare a Construction Environmental Management Plan (CEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.*

C3. *As part of the CEMP required under Condition C2 of this consent, the Applicant must include the following:*

- (a) Erosion and Sediment Control Plan;*
- (b) Complaints Handling;*
- (c) an unexpected finds protocol; and*
- (d) details of traffic management.*

C4. *The Applicant must:*

- (a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and*
- (b) carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.*

Following review of the above conditions, the intention of those conditions, and the approved site plans, the Unexpected Finds Protocol presented in this document should satisfy the Department's requirements.

Based on Condition C3, the Unexpected Finds Protocol will be incorporated into the Construction Environmental Management Plan CEMP).

### **1.2 AUTHORSHIP**

This Unexpected Finds Protocol (UFP) has been prepared by Environmental Risk Assessors Pty Ltd (ERA) which is an environmental and planning focussed consultancy.

ERA consultants and its associates all have tertiary qualifications in environmental or other relevant qualifications and other relevant postgraduate studies. Our consultants and associates are members of relevant professional Institutes and/or associations such as the Institute of Engineers Australia and the Environment Institute of Australia and New Zealand.

## **2 APPROVED DEVELOPMENT**

The approved development is the receiving and processing of 125,000 tonnes per annum (tpa) of liquid waste comprising drilling mud and non-destructive drill mud, cement slurry, concrete washout, oily water (J120), sewage sludge including sewer grit or screenings, stormwater, groundwater (including M250, J100, N160, and F100), industrial wastewater, leachate and firewater (N140).

The approved development provides also for the storage of 5,100 tonnes of liquid waste and liquid waste by-products on site at any one time.

The approved development also includes a new weighbridge, upgrade of the stormwater

management system and use of a three-story office.

Under normal circumstances, developments comprise three stages; demolition, construction and operation. This Unexpected Finds Protocol applies to the demolition and construction stages only.

### **3 SITE DESCRIPTION**

The site is located approximately 40 km southwest of Sydney Central Business District. The site is legally described as Lot 16 DP 717203 within the Ingleburn Industrial Estate. The site is within the land zoning IN1 – General Industrial and it has an area of approximately 1.2 hectares. The site location is illustrated in **Figure 1** and **Figure 2**.

The facility consists of a free-standing three-story concrete main building with a free space area of approximately 4,300 m<sup>2</sup>, as well as two large awnings to the north-eastern and south-eastern sides of the building. The site also contains a security office, weighbridge, eight staff and visitors' car parking spaces, wheel wash, three concrete block external storage bays for solid waste, and stormwater management infrastructure, including four storage tanks, storage pits, collection pits, sediments ponds, etc....

The site is fully sealed with concrete hardstand except for a small, vegetated garden located on the northern side of the site. There is also a small area along the eastern boundary where large trees are planted for minimizing visual, noise and dust impacts.

### **4 DEMOLITION AND CONSTRUCTION REQUIREMENTS**

The proposed works do not include the demolition of any structure but rather excavation of relatively small, concreted areas and the installation of pits, tanks, pumps, valves, etc...

The majority of the construction works will be carried out inside the main building as shown in the approved plans. The only construction works outside the building are associated with the upgrading of the stormwater management system and the second weighbridge.

Based on the above, only certified finished products will be used during the construction stage such as sand, recovered aggregate, concrete, etc... There is no need for the importation of any fill materials such as soil. This should minimise the risk of any potential contaminated soil being imported to the site for the construction stage of the development.

To give the reviewer a better understanding of the location of the development and proposed construction works, we have included in **Figure 3** below a copy of the approved site plan with the locations of the proposed construction works.

It should be noted that due to the fact that the site has been developed for over 25 years, it is highly unlikely that any Aboriginal Heritage items or sites will be found within the development area. The site and all surrounding sites are significantly disturbed during the development of the industrial facilities. Most of these facilities include large buildings, stormwater management systems, car parking, underground storage pits/tanks, underground supporting piers/foundations, etc... The above features and structures would have been the subject of extensive geotechnical and site contamination assessments prior to being approved for construction and operation.

Recently, this site was the subject of a comprehensive Stage 2: Detailed Site Investigation assessment which was undertaken in accordance with the provisions of the Contaminated Land Management Act 1997 and other relevant guidelines as adopted by the NSW Environment Protection Authority (EPA). The assessment revealed that the results of all soil samples were well below the adopted assessment criteria for the industrial use of the site. The results revealed also that the soil is free of any contaminants.

Nevertheless, the management of BRS will implement the procedures presented in this document to ensure compliance with the Consent requirements.



Figure 1: Aerial View of 16 Kerr Road, Ingleburn

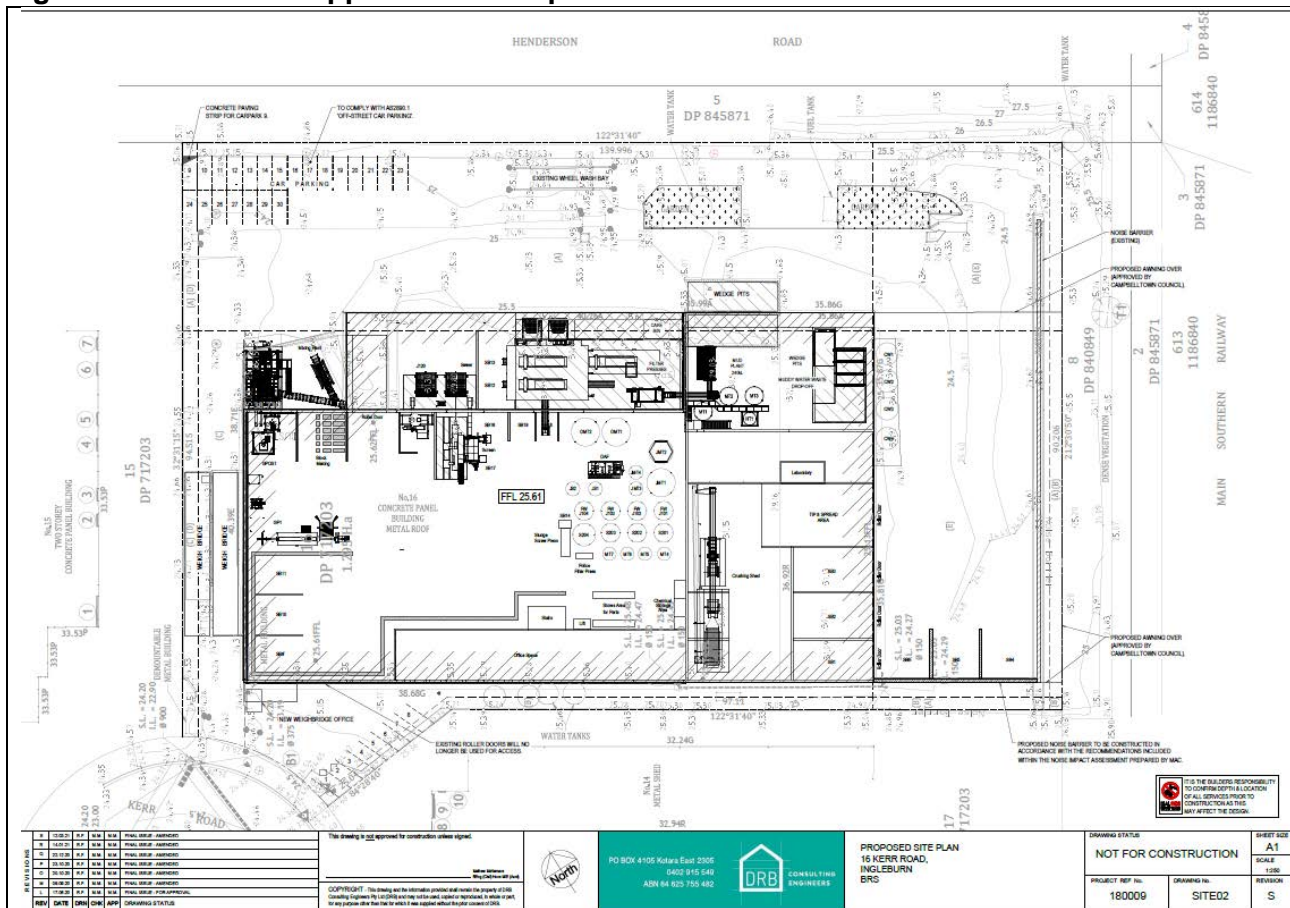




An aerial photograph of an industrial area in Henderson, Nevada. The map shows several large industrial buildings with grey roofs. One building is labeled 'DP 717203'. Another building is labeled 'DP 845871'. A road labeled 'HENDERSON ROAD' runs diagonally across the upper right. Other labels include 'DP 107153', 'DP 840849', 'DP 118640', and 'DP 717203'. The map also shows parking lots with various vehicles and trucks, and some construction equipment. The map is overlaid with a grid of white lines and numbers (15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100).



**Figure 3: Site Plan of Approved Development**



## **5 LEGISLATIVE REQUIREMENTS, POLICIES AND GUIDELINES**

As part of the preparation of this document, it was considered appropriate to consult relevant legislation, guidelines, and policies including but not limited to the following:

1. Environmental Planning and Assessment Act 1997,
2. Environmental Planning and Assessment Regulation 2000
3. Protection of the Environment Operations Act 1997,
4. Waste Avoidance & Resource Recovery Act 2001,
5. NSW Waste Avoidance and Resource Recovery Strategy 2014-2021,
6. Protection of the Environment Operations (Waste) Regulation 2014,
7. Contaminated land management Act 1997,
8. National Parks and Wildlife Act 1974,
9. National Parks and Wildlife Amendment Act 2010,
10. National Parks and Wildlife Regulation 2009,
11. National Parks and Wildlife Amendment Regulation 2010,
12. National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2010,
13. Heritage Act 1977,
14. Heritage Regulation 2012,
15. Waste Classification Guidelines (NSW EPA),

## **6 UNEXPECTED FINDS PROTOCOL**

As previously mentioned, under normal circumstances, the approved development would include the following three (3) stages:

1. Demolition,
2. Construction, and
3. Operation.

However, in some cases and depending on whether the development is new or a modification of an existing development, or whether the development is for residential, commercial, or industrial, the Unexpected Finds Protocol (UFP) will be prepared to capture relevant stages of the development.

Furthermore, the UFP should capture all potential scenarios during all relevant stages of the approved development. The list of possible scenarios for this approved development is provided below.

1. Potential contaminated soil during excavation
2. Potential Aboriginal Heritage item during excavation
3. Potential Aboriginal Heritage site during excavation
4. Potential contaminated soil within the imported fill

A typical Unexpected Finds register is included in Section 8. It is recommended that the Construction Manager/superintendent use that register or an equivalent to ensure that all unexpected finds are recorded for future references and can be presented to any Authority that requests them.

## 6.1 POTENTIAL CONTAMINATED SOIL DURING EXCAVATION

The general requirements outlined below must be complied with during the excavation stage of the development to ensure that all relevant Consent conditions and relevant legislative requirements are complied with.

Any soil excavated on site, and it is considered to be contaminated based on its characteristics, nature, colour, odour, if any, may indicate that the soil is likely to be contaminated. In this case, the soil should be assessed and classified in accordance with the EPA's Waste Classification Guidelines. If the soil is classified as being anything other than General Solid Waste (non-Putrescible) it must be transported to a lawfully licensed facility that can accept such waste. The principles outlined below must be adhered to by the Construction Manager during the construction stage (mostly excavation).

Waste being transported from the site must be adequately covered to ensure it does not fall or spill onto the road and create dust and litter, or damage other vehicles. The EPA can impose fines and penalties on waste transporters who do not cover their loads. It is therefore of utmost importance to avoid escape of waste during transport.

Clause 70 of the Protection of the Environment Operations (Waste) Regulation 2014 (Waste Regulation 2014) therefore requires that:

- *waste that is transported by a motor vehicle or trailer, must be transported in a manner that avoids the waste spilling, leaking or otherwise escaping*
- *waste must be covered during transportation unless the waste consists solely of waste tyres or scrap metal*
- *the motor vehicle or trailer used to transport the waste must be constructed and maintained to avoid the waste spilling, leaking, or otherwise escaping from the motor vehicle or trailer.*

Section 143 of the Protection of the Environment Operations Act 1997 requires waste to be transported to a place that can lawfully accept it. The owner of the waste and the transporter are each guilty of an offence when waste is transported to a place that cannot lawfully be used as a waste facility.

In addition to the above requirements, the following practices will be implemented by the both the site management and the transport company:

- ❖ Know what types of waste are carried on your vehicle.
- ❖ Check the development consent and environment protection licence, if applicable for the waste facility to make sure it can lawfully accept the waste.
- ❖ Provide the waste facility with details of the waste (classification, origin, and quantity)
- ❖ Ensure any vehicle used for the transport of waste is constructed and maintained to prevent spillage of waste.
- ❖ Check the containers used to transport waste are secured safely on the vehicle.
- ❖ Ensure that any waste that is transported by a vehicle is covered during its journey.
- ❖ Keep accurate written records such as:
  - details of the waste (classification, name and address of its origin and quantity),
  - copies of waste dockets/receipts for the waste facility (date, time of delivery, name and address of the facility, its ABN, contact person).

## **6.2 POTENTIAL ABORIGINAL HERITAGE ITEM/OBJECT DURING EXCAVATION**

As previously stated, the site has been significantly disturbed as part of several previous developments associated with the site. Those developments included the excavation of most external and internal areas to construct pits and install piping grids between several sections of the underground piping system. It is not anticipated to find any Aboriginal Heritage Items during this stage of the development. However, if any item is suspected to be of Aboriginal Heritage origin and/or value, the methodology outlined below must be followed.

### **1 Stop work, protect item and inform the Construction Manager**

- Stop all work in the immediate area (a minimum of a 10m wide buffer area) of the item and notify the Construction Manager,
- Establish a 'no-go zone' around the item. Use high visibility fencing, where practical,
- Inform all site personnel about the no-go zone,
- Inspect, document, and photograph the item,
- Confirm with the site environment representative, if applicable, or suitably qualified environmental consultant that the find is unexpected and if a permit is required.

### **2 Contact and engage an Aboriginal heritage consultant**

- Contact a qualified Aboriginal heritage consultant to discuss the location and extent of the item and arrange a site inspection,
- If requested, provide photographs.

### **3 Preliminary assessment and recording of the find**

- Arrange site access for the Aboriginal heritage consultant to inspect the item as soon as practicable,
- Subject to the Aboriginal heritage consultant's assessment, work may recommence at a set distance from the item. Existing protective fencing established in Step 1 may need to be adjusted to reflect the extent of the newly assessed protective area. No works are to take place within this area once established,
- The Aboriginal heritage consultant may provide advice after the site inspection and preliminary assessment that no heritage constraint exists for the project (e.g. the item is not a 'relic' or a 'heritage item' or an 'Aboriginal item',
- Where the item has been identified as a 'relic' or 'heritage item' or an 'Aboriginal object' an Aboriginal or Historical archaeologist should formally record the item,
- Where an Aboriginal object is recorded it must be registered on the Aboriginal heritage information management system (AHIMS) in accordance with section 89A of the NPW Act,
- OEH (Heritage Division for non-Aboriginal relics and Planning and Aboriginal Heritage Section for Aboriginal objects) and Heritage NSW can be notified informally by telephone or email at this stage by the Construction Manager.
  - OEH Environment Line ph.: 131 555
  - Email: [info@environment.nsw.gov.au](mailto:info@environment.nsw.gov.au)
  - Heritage NSW on (02) 9873 8500

### **4 Aboriginal heritage consultant to prepare management requirements for site**

- An archaeological or heritage management plan is developed outlining management actions to ensure damage to the item is minimised and work can recommence,
- This plan will be developed by the Aboriginal heritage consultant in consultation with the OEH and the Department as required.

## **5 Notify the regulator, if required.**

- If notification is required, complete a formal notification letter, including the archaeological/heritage management plan and other relevant supporting information. For historical relics, a s146 notification form will be required to be submitted to the Heritage Division,
- Forward the signed notification letter to OEH and the Department,
- A copy of the final signed notification letter, archaeological or heritage management plan and the site recording form is to be kept on file and a copy sent to the Construction Manager.

## **6 Resume work**

- The management plan is implemented, and the project construction environmental management plan (CEMP) is updated to reflect any additional controls and requirements,
- Seek written clearance to resume project work from the Construction Manager and the Aboriginal heritage consultant. Clearance would only be given once all archaeological excavation and/or heritage recommendations and approvals (where required) are complete,
- Resumption of project work must be in accordance with all relevant project/heritage approvals/determinations.

### **6.3 POTENTIAL ABORIGINAL HERITAGE SITE DURING EXCAVATION**

As previously stated, the site has been significantly disturbed as part of several previous developments associated with the site. Those developments included the excavation of most external and external areas to construct pits and install piping grids between several sections of the underground piping system. In addition to the significant disturbance of the site, it is not located near or adjacent to a waterway or Aboriginal Heritage sites could be present. Therefore, it is not anticipated to find any Aboriginal Heritage sites during this stage of the development. However, if any area/site is suspected to be of Aboriginal Heritage origin and/or value, the methodology outlined below will be followed.

#### **1 Stop work, protect item and inform the Construction Manager**

- Stop all work in the immediate area (a minimum of a 10m wide buffer area) of the suspected heritage area/site and notify the Construction Manager,
- Establish a 'no-go zone' around the suspected area/site. Use high visibility fencing, where practical,
- Inform all site personnel about the no-go zone,
- Inspect, document, and photograph the suspected area/site,
- Confirm with the site environment representative, if applicable, or suitably qualified environmental consultant that the find is unexpected and if a permit is required.

#### **2 Contact and engage an Aboriginal heritage consultant**



- Contact a qualified Aboriginal heritage consultant to discuss the location and extent of the item and arrange a site inspection,
- If requested, provide photographs.

### **3 Preliminary assessment and recording of the find**

- Arrange site access for the Aboriginal heritage consultant to inspect the suspected area/site as soon as practicable,
- Subject to the Aboriginal heritage consultant's assessment, work may recommence at a set distance from the item. Existing protective fencing established in Step 1 may need to be adjusted to reflect the extent of the newly assessed protective area. No works are to take place within this area once established,
- The Aboriginal heritage consultant may provide advice after the site inspection and preliminary assessment that no heritage constraint exists for the project (e.g. the suspected area/site is not a 'heritage area/site' or an 'Aboriginal area/site',
- Where the item has been identified as a 'relic' or 'heritage item' or an 'Aboriginal object' an Aboriginal or Historical archaeologist should formally record the area/site,
- Where an Aboriginal object is recorded it must be registered on the Aboriginal heritage information management system (AHIMS) in accordance with section 89A of the NPW Act,
- OEH (Heritage Division for non-Aboriginal relics and Planning and Aboriginal Heritage Section for Aboriginal objects) and Heritage NSW can be notified informally by telephone or email at this stage by the Construction Manager.
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- An archaeological or heritage management plan is developed outlining management actions to ensure damage to the area/site is minimised and work can recommence,
- This plan will be developed by the Aboriginal heritage consultant in consultation with the OEH and the Department as required.

### **5 Notify the regulator, if required.**

- If notification is required, complete a formal notification letter, including the archaeological/heritage management plan and other relevant supporting information. For historical relics, a s146 notification form will be required to be submitted to the Heritage Division,
- Forward the signed notification letter to OEH and the Department,
- A copy of the final signed notification letter, archaeological or heritage management plan and the site recording form is to be kept on file and a copy sent to the Construction Manager

### **6 Resume work**

- The management plan is implemented, and the project construction environmental management plan (CEMP) is updated to reflect any additional controls and requirements,
- Seek written clearance to resume project work from the Construction Manager and the Aboriginal heritage consultant. Clearance would only be given once all archaeological

excavation and/or heritage recommendations and approvals (where required) are complete. Resumption of project work must be in accordance with all relevant project/heritage approvals/determinations.

#### **6.4 POTENTIAL CONTAMINATED SOIL WITHIN THE IMPORTED FILL**

Due to the fact that the site is an approved, licensed and well-established Resource Recovery Facility (RRF) which has been operating for several years, it has prepared and implemented all methodologies required by the authorities to ensure that only permitted materials can be accepted on site.

As part of the construction stage of the development, it is anticipated that only finished and fully processed fill/products such as sand, recovered aggregate or concrete will be imported and used on the site. The only other materials that could be used, if required, will be Virgin Excavated Natural Materials (VENM), Excavated Natural Materials (ENM) or other materials approved by the NSW Environment Protection Authority (EPA). In any case, the procedures currently applicable to all waste materials entering the site as part of the RRF, will be applied to any materials imported to the site for use in the construction works associated with the approved development. A summary of these procedures is included below.

All materials brought to the site must go through a pre-approval process which will identify the materials coming in with all materials requiring all or a combination of the following:

- Waste classification report/certificate,
- Validation report,
- Quantity of material,
- Source of the load,
- Transporter details such as name, contact details, address,
- Truck details such as make, model, rego, colour, type and size,
- Sometimes a visual inspection of the materials is undertaken at the source prior to being brought onsite.

Once the material is Identified as suitable for the construction, the order is booked in with the weighbridge operator detailing expected material, quantity, tipping area allocated, account details identified and BRS' Terms and Conditions signed which details that if the load is not accepted or unsuitable, it will be rejected and sent back.

For all materials entering the site, the following procedures will be followed:

- The imported materials will be brought onto the premises from known sources only.
- All vehicles will be weighed on the weighbridge,
- While vehicles are on the weighbridge, the truck covers will be removed, and the loads inspected by the nominated resource recovery staff and checked against the documentation submitted from the source of the materials to ensure that the materials are the same as described in the waste classification report or validation certificate, if required. Special attention will be paid to the identification of any contaminants of hazardous nature such as asbestos, tyres, batteries, etc....,
- If the materials pass the visual inspection, the driver will be directed to the specific area for the materials (sand, recovered aggregate, concrete, etc...) for unloading,
- The nominated resource recovery staff will inspect the unloaded materials for a second time to ensure that the materials comply with the waste classification report or validation

certificate. Special attention is paid to the identification of any contaminants such as asbestos, tyres, batteries, etc....,

- If hazardous or special wastes are found in the unloaded materials, the nominated resource recovery staff will segregate (fence off, cover and sign post) the stockpile, containing same, call the company where the materials were transported from and inform them that the materials are not accepted on the premises and must be removed immediately. The nominated resource recovery staff will record all relevant details in the “*Unsuspected Finds Register*”,
- Assess the potential immediate risk to human health likely to be posed by the unexpected find and assess whether evacuation and/or the emergency response plan should be activated,
- The materials will be stored the furthest possible away from any other stockpile to prevent cross contamination between the clean certified/validated and non-clean materials,
- The non-clean materials should be removed from the site as soon as an agreement is reached with the generator but no later than within 48 hours independently of its origin and size. Under normal circumstances, each load should be stored separately unless several loads arrive on the same day from the same source. BRS will inform the generator that it will no longer accept materials from that source unless further testing by an independent environmental consultant is undertaken in accordance with current NSW Waste Classification guidelines,
- The area to be used for storing the contaminated (non-compliant) materials will be fenced off any other section of the site. If the materials are associated with the external construction works and they are stored outside, the materials will be covered by suitable weather-proof materials to prevent the infiltration of rainwater into the stockpiled materials which may result into the generation of leachate and subsequently potential land pollution and/or groundwater pollution. The weather-proof cover will also prevent the generation of dust under dry windy conditions which may result into dust emissions migrating to neighbouring properties.
- In addition to the above controls, normal stockpile management practices in accordance with the guidelines “*Managing Urban Stormwater: Soils & Construction – Volume 1 – 4<sup>th</sup> Edition, March 2004 – Landcom*” (The “*Blue Book*”) will be implemented. These may include sediment fencing around the perimeter of the stockpile base to prevent any sediments from leaving the area,
- Seek advice from a suitably qualified environmental consultant whether any further action is required such as an environmental risk assessment to determine whether further actions are required including possible remediation and validation of the potentially affected area of the site.
- All materials entering the site, whether they are accepted or rejected will be subjected to full recording as outlined above. All details will be kept on site at all times.



## **7 STAFF TRAINING**

All relevant staff employed on site as part of the construction stage will undergo training as part of their initial and on-going induction to ensure that they are aware of possible finds and identification of these materials when found either in the imported materials or within the excavated areas. However, due to the wide range of possible finds, any suspected finds should be notified to the Construction Manager for confirmation or clarification of that find. In case the Construction Manager is unsure of identifying the find, he/she should seek urgent advice from relevant environmental consultant, heritage expert or relevant authorities.

## 8 TYPICAL UNEXPECTED FINDS REGISTER

Based on the information presented above, the potential for the presence of any unexpected find is very low. However, in the case of identifying any unexpected find, it is recommended that the Unexpected Find Register presented below, or equivalent be used.

| Find No | Date & Time | Finder Name | Accurate Location (GPS) |          | Find Description | Comments | Notified Person | Outcome |
|---------|-------------|-------------|-------------------------|----------|------------------|----------|-----------------|---------|
|         |             |             | Easting                 | Northing |                  |          |                 |         |
| 1       |             |             |                         |          |                  |          |                 |         |
| 2       |             |             |                         |          |                  |          |                 |         |
| 3       |             |             |                         |          |                  |          |                 |         |
| 4       |             |             |                         |          |                  |          |                 |         |
| 5       |             |             |                         |          |                  |          |                 |         |
| 6       |             |             |                         |          |                  |          |                 |         |
| 7       |             |             |                         |          |                  |          |                 |         |
| 8       |             |             |                         |          |                  |          |                 |         |
| 9       |             |             |                         |          |                  |          |                 |         |
| 10      |             |             |                         |          |                  |          |                 |         |
| 11      |             |             |                         |          |                  |          |                 |         |

The Unexpected Find Register must be kept on site until the completion of all construction works associated with the approved development. All Finds must be reported immediately to the Construction Manager who is responsible to notify relevant authorities in accordance with the procedures outlined in this document.

**Attachment 5 – BRS Construction Traffic Management Plan**



# BRS Construction Traffic Management Plan

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PROCEDURE NO. 211603.3

DATE: 06/07/2021

PREPARED BY: Environmental Risk Assessors Pty Ltd REVISION NO:1

SUBJECT: Construction Traffic Management Plan

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## 1 Introduction

This document provides concept details of the management of traffic and pedestrian movements to be implemented during construction of the approved development at 16 Kerr Road, Ingleburn NSW in accordance with Development Consent SSD 8593 (Consent). The Consent was issued to BRS by the Department of Planning, Industry and Environment (Department) on 26 May 2021.

This Traffic Management Plan will form part of the Construction Environmental Management Plan (CEMP) in accordance with condition C3 of the Consent which states:

*“C3 As part of the CEMP required under Condition C2 of this consent, the Applicant must include the following:*

- (a) *Erosion and Sediment Control Plan,*
- (b) *Complaints Handling,*
- (c) *an unexpected finds protocol, and*
- (d) *details of traffic management”*

The approved development also includes a new weighbridge, upgrade of the stormwater management system and use of a three-story office.

Under normal circumstances, developments comprise three stages; demolition, construction and operation. This Traffic Management Plan applies to the demolition and construction stages only.

Normal construction working hours are included in Condition B15 of the Ct which states:

*“The Applicant must comply with the hours detailed in Table 2, unless otherwise agreed in writing by the Planning Secretary.*

**Table 2** Hours of Work

| Activity                    | Day             | Time         |
|-----------------------------|-----------------|--------------|
| Earthworks and construction | Monday – Friday | 7 am to 6 pm |
|                             | Saturday        | 8 am to 1 pm |

The plan covers the following areas:

- Ingress and egress of vehicles to the site.
- Details on loading and unloading zones.
- Onsite parking measures during construction.
- Pedestrian management strategies.

Since all construction activities are undertaken within the boundaries of the site, there are no potential impacts on Kerr Road and surrounding road network including bus stops, pedestrian footpaths, or pedestrian crossings. Nonetheless, the information provided in this document aims to minimise the impact of the construction activities on vehicle and pedestrian traffic in the surrounding area.

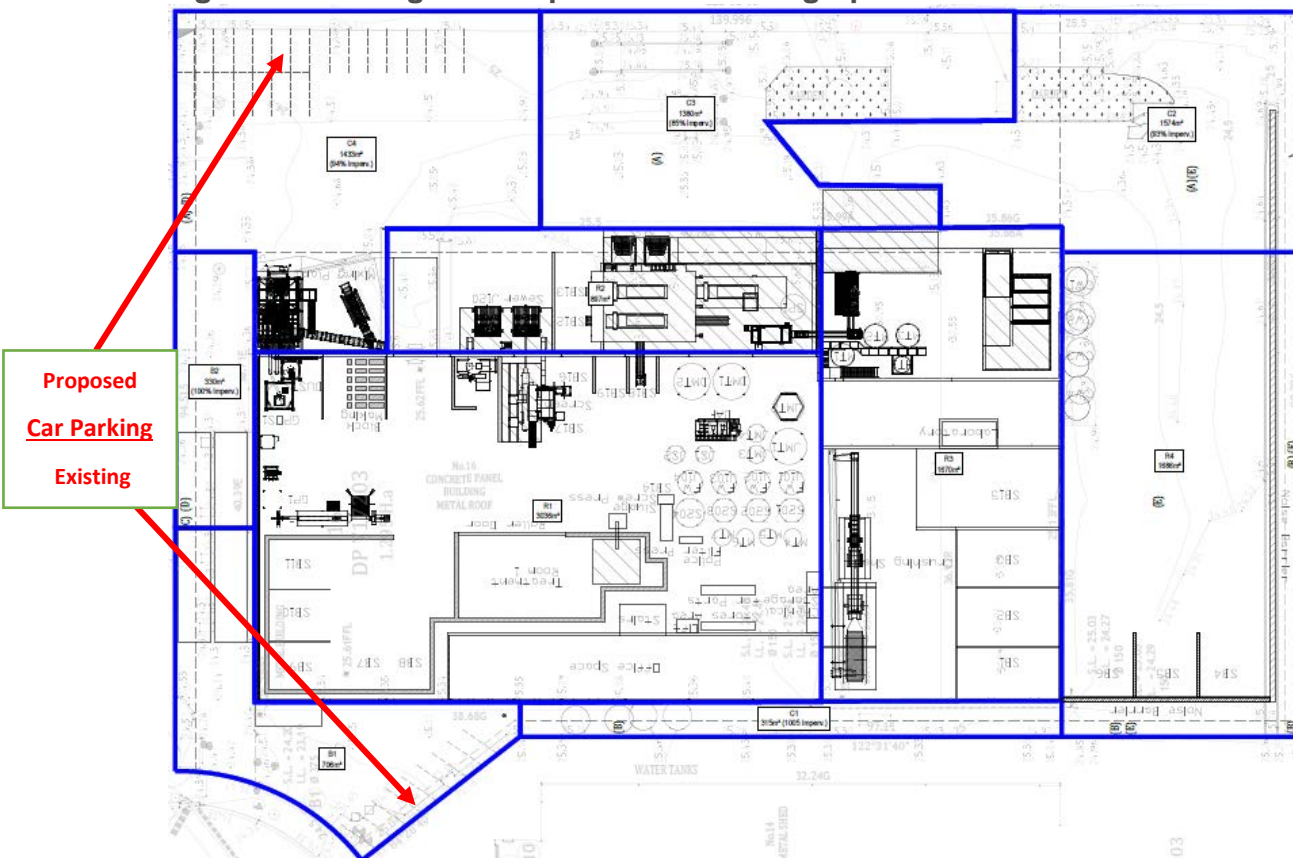
## 2 Ingress and Egress of Vehicles to the Site

The factors that have been considered in preparing this Construction Traffic Management Plan are:

- The work site has direct frontage to a local road (Kerr Road),
- There will be no off-site car parking required since there is ample car parking provided within the boundaries of the site. Refer to **Figure 1**,
- All deliveries and workers will approach the site from Kerr Road via the road network presented in **Figure 2**.

As previously stated, the construction activities are contained within the boundaries of the site and away from the entry/exit driveway to the site, therefore, it is expected to have any impact on Kerr Road or the footpath outside the gate of the driveway. However, the Site Manager/Construction Manager will consider the use of a professional traffic control crew if and when there will be impacts on the local traffic and pedestrian flow. As part of the pre-works setup, the professional traffic crew will develop and implement a traffic management plan specific to the task at hand, based on the parameters of the Construction Traffic Management Plan adopted in this document and approval from the relevant authorities, if required.

**Figure 1: Existing and Proposed Car Parking Spaces**



**Figure 2: Road Network Leading to the Site**



### **3 Details of Loading and Unloading Zones**

Kerr Road will be the primary access for deliveries, loading and unloading, and heavy logistics associated with the construction work. All loading/unloading will occur onsite via the existing driveway and weighbridge. Any deliveries of small packages will be left at the security/weighbridge office for collection by relevant staff or contractors in non-peak traffic hours (before 8 am and between 9 am - 3 pm).

No unloading/loading will occur outside the boundaries of the site unless in an emergency or for safety reasons. In this case, the relevant authorities will be notified immediately of such an action and an incident will be recorded. No amendments are required to the current traffic and parking arrangements in Kerr Road as a result of the BRS construction activities.

### **4 Pedestrian Traffic Management Methods**

Under normal circumstances, construction works may interfere with pedestrian movements along the site frontage on Kerr Road especially during loading and unloading of deliveries, and waste management within the approved site. However, with deliveries restricted to before 8 am and between 9 am - 3 pm the peak pedestrian traffic periods are avoided and the impact of the construction on pedestrian movements is minimised.



If employed, traffic marshals will monitor and restrict pedestrian movements through the site frontage when necessary to ensure the safety of pedestrians. The marshals will guide pedestrians safely through or around the site frontage. Where necessary pedestrians will be protected by fencing or concrete barriers with a safe travel route identified with hi-vis bunting. Prior to commencement of construction, if required a pedestrian movement management plan will be prepared by the construction Manager and implemented during construction.

## **5 Parking Measures during Construction**

The site has ample car parking that are dedicated to employees, visitors, and contractors. The car parking spaces are at the front of the building and the most northwestern corner of the site. Due to the COVID-19 Pandemic, significant reduction of waste processing and the delay in gaining approval for the development, the number of employees was reduced significantly. This means that many of the car parking spaces will be available to be used for the construction workers/contractors until the completion of the construction activities. This is extremely important to ensure that the already approved activities can continue to operate without any significant interference between the construction activities and normal existing activities.

If considered necessary, the Construction Manager can request from BRS management to limit the waste processing, including vehicular movements to the site during certain specific construction activities and/or times to minimise any conflict between construction activities and normal operational activities. In some circumstances, non-essential employees/contractors will be required to use car-pooling, if it is considered necessary. Site induction documentation will alert all construction employees and contractors of the parking arrangements to minimise the impact of construction on Kerr Road.

## **6 Traffic Control Signs**

During construction, Kerr Road will be subject to construction traffic impacts so if required reduced daylight hours speed zones should be in place along the site frontage during construction. Advance warning signs on Kerr Road will be required in accordance with a traffic control plan prepared for the Construction Manager as part the documentation and implemented prior to the start of any construction works. If required, suitably accredited traffic marshals from professional Traffic Control companies will be employed to install and maintain the signage as well as monitor and control vehicle and pedestrian traffic through the site frontage during construction.

## **7 On site Traffic Management Measures**

During the construction stage of the development, the traffic management measures listed below must be implemented on site to minimise the traffic impact on employees, visitors, contractors, and nearby properties.

- Directions and rules for engagement with mobile equipment,
- Directions for permitted and non-permitted methods of work on and around vehicles,



- Specifications for safety signs which shall be in place to support site controls,
- Specifications for Personal Protective Equipment (PPE) that shall be available and used by staff, visitors, and contractors on-site's traffic management map,
- A summary of the hazard identification and risk assessment process used,
- Details of the process used to evaluate controls once they are in place, and
- Update traffic management plan in accordance with expansion, if required.
- All heavy vehicles arriving to the site will require scheduling or pre- notification of arrival allowing for management of vehicle load. If the premises is at capacity, vehicles will be advised to delay their journey to the site. If vehicles arrive to site without scheduling and no capacity is available, they will be turned away.
- Whilst on site, all vehicles are to abide by the traffic management plan and undertake all listed procedures required.