Appendix B7

Construction Waste Management Sub Plan (CWMSP)

Kingscliff High School Upgrade

December 2021



Document control

Approval and authorisation

Title	Kingscliff High School Upgrade: Waste Management Sub – Plan (CWMSP)
Approved on behalf of Richard Crookes Constructions by	
Signed	
Dated	
Approved on behalf ENV Solutions by	Ben Pieterse
Signed	grown -
Dated	03/12/2021

Document status

Revision	Date	Description	Approval
Draft	08/10/21	Submission of Draft for Comments	Ben Pieterse
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R2	09/12/21	Addressing of Comments	Ben Pieterse

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Copy number	Issued to	Version
01	Richard Crookes	R1

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Glossary/ Abbreviations

Abbreviations	Expanded text
CEMP	Construction Environmental Management Plan
DP&E	NSW Department of Planning and Environment
DPI	NSW Department of Primary Industries
EIS	Ecological Impact Statement
ENM	Excavated Natural Material, as defined in <i>The excavated natural</i> material exemption
EPA	NSW Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EPL	Environmental Protection Licence
EWMS	Environmental Work Method Statements
PESCP	Progressive Erosion and Sediment Control Plan
RAP	Reclaimed asphalt pavement
Resource	Resource covers energy, fuel, oil, water and other materials used for construction of the project
VENM	Virgin Excavated Natural Material
WARR Act	Waste Avoidance and Resource Recovery Act 2001
CWMSP	Construction Waste Management Sub-Plan
WRAPP	Waste Reduction and Purchasing Policy

Condition B18 Compliance Table

Condition	Condition Requirements	Document reference
	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following:	
B18	the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use.	3 - 7
	information regarding the recycling and disposal locations.	8 - 9
	confirmation of the contamination status of the development areas of the site based on the validation results.	N/A

1 Introduction

1.1 Context

This Construction Waste Management Sub Plan (CWMSP or Plan) forms part of the Construction Environmental Management Plan (CEMP) for the Kingscliff High School (KHS) Upgrade (the Project).

1.2 Background and project description

The KHS Upgrade Project will include the demolition of existing facilities including carparks, along with the following planned upgrades;

- Construction of a new Visual Arts, Music and Performance Building (Building O) in the north-western portion of the site;
- Refurbishment of a car park to the east of Building O;
- New bike parking facilities in the northern portion of the site;
- An extension to the south of the existing Building A;
- A new hydrant booster, tank and pump room in the north-eastern portion of the site;
- A new Covered Outdoor Learning Area (COLA) to the east of existing Building H;
- Demolition of a footpath and new landscaping works to the north of the current Building F; and
- Alterations and refurbishment of existing buildings C and G.

The Project site is located in the town of Kingscliff, in the Northern Rivers region of New South Wales (NSW), within the Tweed Shire Local Government Area (LGA).

The Environmental Impact Statement (EIS) prepared by SJB Planning on behalf of the NSW Department of Education (DoE) in support of State Significant Development Application (SSD) SSD-8744305, assessed the impacts of construction in terms of waste generation/management and resource use, within chapters 3.10 and 6.16.

The EIS identified the various waste streams that would be generated during the construction of the project, including demolition waste, construction waste and occupational waste. It also identified opportunities to avoid, reduce and recycle waste.

2 Purpose and objectives

2.1 Purpose

The purpose of the CWMSP is to address satisfy conditions of the State Significant Development Approval (SSDA-8744305 dated 4th Nov 2021, condition B18) Where:

- B18. The Construction Waste Management Sub Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following:
 - a) The recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use (Section 5);
 - b) Information regarding the recycling and disposal locations (Section 5); and
 - c) Confirmation of contamination status of the development areas of the site based on the validation results.

2.2 Objectives

In complying with condition B18 (SSDA-8744305 dated 4th Nov 2021), the objective of the CWMPS is to ensure all waste management and resource recovery objectives, presented in the EIS and Waste Avoidance and Resource Recovery Act (2001), are identified and determined to allow the principal contractor to manage waste onsite compliantly and effectively.

3 Environmental requirements

3.1 Legislation, Guidelines and Standards

The main guidelines, specifications, and policy documents relevant to this plan include:

- Waste Avoidance and Resource Recovery Act 2001;
- Contaminated Land Management Act 1997;
- Environmentally Hazardous Chemicals Act 1985;
- Protection of the Environment Operations Act 1997;
- Protection of the Environment Operations (Waste) Regulation 2014;
- Tweed Shire Council Development Control Plan, Section A15 2008;
- NSW Environment Protection Authority Better Practice Guide for Waste Management and Recycling in Commercial and Industrial Facilities 2012; and
- Construction and Demolition Waste Guide Recycling and Reuse Across the Supply Chain Department of Sustainability, Environment, Water population and Communities 2011.

4 Environmental aspects and impacts

4.1 Construction waste streams and resource use

The following construction related waste streams have been identified:

- Demolition of internal walls.
- Demolition of the hardstand area of carpark
- Demolition of landscaping throughout the site.
- Construction waste such as timber, brick and concrete waste.

The EIS also notes that the increase in pupil capacity at Kingscliff High School following the upgrade will drastically increase operational waste such as Cardboard/paper recycling, co-mingling recycling, food organics recycling and general waste. This waste generated following the completion of the project will be the responsibility of Kingscliff High School and will be contained within the Operational Waste Storage and Processing Plan (OWSP) required as part of SSDA-8744305 dated 4th Nov 2021, condition B26).

4.2 Impacts

The potential environmental impacts associated with waste generation and resource use during the demolition and construction phase of the Project include:

- Generation of excessive waste
- Land and water pollution as a result of inappropriate disposal of waste.
- Generation or spread of contaminated and or hazardous waste/soils, e.g. unexpected find of contaminated sediment, and materials/soils impacted by chemical leaks and spills.
- Avoidable use of resources.
- Consumption of non-renewable resources such as energy, diesel and other chemicals; and greenhouse gas emissions due to consumption of energy from non-renewable resources.

5 Waste management and resource conservation

5.1 Waste management hierarchy

Richard Crookes Construction will follow the principles of the waste management hierarchy in accordance with the Waste Avoidance & Resource Recovery Act 2001. The waste hierarchy outlines a process for waste management which aims to implement effective use of resources and minimise waste in accordance with EPA's NSW Waste Avoidance and Resource Recovery Strategy 2014-21. The waste management hierarchy is illustrated in Figure 5-1 below.



Figure 5-1: Waste management hierarchy

5.1.1 Reuse and recycling

Waste avoidance will be prioritised during the construction phase of the Project in accordance with the waste management hierarchy.

Wherever possible, waste will be separated and segregated on-site to facilitate reuse and recycling. Waste materials, including excavated soil and construction waste, will be separated onsite into dedicated bins/areas for either reuse onsite or collection by a waste contractor and transport to offsite facilities.

Richard Crookes Constructions will make sure that all necessary planning is undertaken, and site activities coordinated, to avoid spoilage of materials and excessive generation of waste.

5.1.2 Waste handling and storage

Where waste is required to be handled and stored onsite prior to onsite reuse or offsite reuse/recycling/disposal, the following measures apply:

- During demolition, the site would be secured with safety fencing and demolition waste would initially be placed in waste streams in designated skip bins for transport to the resource recovery centre. Skip bins would be provided for:
 - Concrete, bricks and tiles
 - Co mingled waste

- General waste
- Any other excavated material (e.g. soil and rock) is to be stored in designated stockpile areas and mitigation measures outlined the Soil and Water Management Sub Plan where:
 - Stockpiles must be located at least 5 m from likely areas of concentrated water flows, and more than 10 m from a any waterway;
 - Stockpile heights shal not exceed 4 m, and slopes shall be no steeper than 2:1;
 - Adequate sediment control measures must be installed prior to stockpiling material;
 and
 - Stockpiles that will be in place for more than 20 days, or which are susceptible to wind or water erosion, shall be covered or otherwise protected from erosion, within 10 days of forming each stockpile.
- Any liquid wastes are to be stored in appropriate containers in bunded areas until transported
 offsite. Bunded areas will have the capacity to hold 110 per cent of the liquid waste volume for
 bulk storage or 120 per cent of the volume of the largest container for smaller packaged storage.
 No liquid waste is expected.
- Any hazardous waste will be managed by appropriately qualified and licensed contractors, in accordance with the requirements of the *Environmentally Hazardous Chemicals Act 1985* and the EPA waste disposal guidelines. No hazardous waste is expected.

All other recyclable or non-recyclable wastes are to be stored in appropriate covered receptacles (e.g. bins or skips) in appropriate locations onsite and contractors commissioned to regularly remove/empty the bins to approved disposal or recycling facilities.

5.1.3 Waste disposal

Waste (and sediment) disposal is to be undertaken in accordance with the *Protection of the Environment Operations Act 1997* and the *Waste Avoidance and Resource Recovery Act 2001*. Wastes that are unable to be reused or recycled will be disposed of offsite to an appropriately licenced waste management facility following classification (refer to section 5.2). Details of waste types, volumes and destinations are to be recorded in the Waste Management Register (Appendix A).

5.2 Classification of waste streams

Where waste cannot be avoided, reused or recycled it will be classified and appropriately disposed of. The classification of waste will be undertaken in accordance with the EPA (2014) *Waste Classification Guidelines Part 1: Classifying Waste.* This document identifies six classes of waste: Special, Liquid, Hazardous, Restricted Solid, General Solid (putrescible) and General Solid (non-putrescible); and describes a six-step process to classifying waste. That process is described below:

Step 1: Is it 'special waste'?

Establish if the waste should be classified as special waste. Special wastes are: clinical and related, asbestos, waste tyres. Definitions are provided in the guidelines.

Note: Asbestos and clinical wastes must be managed in accordance with the requirements of Clauses 42 and 43 of the *Protection of the Environment Operations (Waste) Regulation 2005.*

Step 2: If not special, is it 'liquid waste'?

If it is established that the waste is not special waste it must be decided whether it is 'liquid waste'. Liquid waste means any waste that: has an angle of repose of less than 5° above horizontal becomes free flowing at or below 60° Celsius or when it is transported is generally not capable of being picked up by a spade or shovel.

Liquid wastes are sub-classified into:

Sewer and stormwater effluent
 Trackable liquid waste according to Protection of the Environment Operations (Waste) Regulation 2005 Schedule 1 Waste to which waste tracking requirements apply
 Non-trackable liquid waste.

Step 3: If not liquid, has the waste already been pre-classified by the NSW EPA?

The EPA has pre-classified several commonly generated wastes in the categories of hazardous, general solid waste (putrescibles) and general solid waste (non-putrescibles). If a waste is listed as 'pre-classified', no further assessment is required.

Step 4: If not pre-classified, is the waste hazardous?

If the waste is not special waste (other than asbestos waste), liquid waste or pre-classified, establish if it has certain hazardous characteristics and can therefore be classified as hazardous waste.

Hazardous waste includes items such as explosives, flammable solids, substances liable to spontaneous combustion, oxidizing agents, toxic substances and corrosive substances.

Step 5: If the waste does not have hazardous characteristics, undertake chemical assessment to determine classification.

If the waste does not possess hazardous characteristics, it needs to be chemically assessed to determine whether it is hazardous, restricted solid or general solid waste (putrescible and non-putrescible). If the waste is not chemically assessed, it must be treated as hazardous.

Waste is assessed by comparing Specific Contaminant Concentrations (SCC) of each chemical contaminant, and where required the leachable concentration using the Toxicity Characteristics Leaching Procedure (TCLP), against Contaminant Thresholds (CT).

Step 6: Is the general solid waste putrescible or non-putrescible?

If the waste is chemically assessed as general solid waste, a further assessment is available to determine whether the waste is putrescible or non-putrescible. The assessment determines whether the waste is capable of significant biological transformation. If this assessment is not undertaken, the waste must be managed as general solid waste (putrescible).

5.3 Waste exemption

Clause 51 of the Protection of the Environment Operations (Waste) Regulation 2005 enables the EPA to grant exemptions to the licensing and payment of levies for the land application or use of waste. The EPA has issued general exemptions for a range of commonly recovered, high volume and well characterised waste materials that allow their use as fill at unlicensed, off-site facilities. The general 'Resource Recovery Exemptions' that may be applicable to this Project are identified below. These are general gazette exemptions that do not require approval. A specific exemption may be granted where an application is made to the EPA.

- Excavated natural material (ENM);
- Stormwater; and
- Recovered aggregate.

Excavated soil will be assessed for compliance with the *Excavated Natural Material Order and Exemption 2014* (the *ENM Order*), and beneficially reused off-site is suitable. Excavated soil will be tested, and laboratory analysed for the chemical and other material requirements outlined in Table 4 of the *ENM Order*. The number of samples for classification and assessment purposes will be collected in accordance with Table 1 of the *ENM Order*. If soil material cannot be validated as ENM it will be classified in accordance with the EPA (2014) *Waste Classification Guidelines Part 1: Classifying Waste* as outlined in Section 5.2 of this Plan.

5.4 Management of waste streams

The construction activities and types of wastes which may be generated during construction are outlined in Table 5-2, including details of proposed waste management/disposal facility. All waste materials must be placed into clearly labelled skip bins within a designated waste storage area. The applicant must outline the on-site path of travel for waste collection vehicles as specified in the

Conditions of Consent. The path of travel must allow for waste collection vehicles up to the maximum size of a medium rigid truck with the capacity to lift and transport an 8m³ hook lift bin.

5.5 Resource management and conservation

Richard Crookes Construction is dedicated to implementing resource conservation best practice and the reduction of greenhouse gases by adopting energy efficient work practices including:

- Developing and implementing procedures to minimise energy use; and
- Conducting awareness programs for all site personnel regarding energy conservation methods.

Table 5-2: Management of waste streams

Construction Activity	Waste Type	Waste Classification	Proposed reuse/recycling/disposal methods	Waste Quantity	Reuse / Recycle Target	Comments
Demolition/refurbishment of carpark	Asphalt/concrete	Recovered Aggregate & Reclaimed Asphalt assessment required	Re-used off site	120 m ³ 100 m ³	Resource recovery	Subject to EPA waste exemption results
Demolition of building adjacent to Building C (Appendix B – Excerpt of Demolition Plan).	Plaster board Steel (reo) Roof Sheeting	General solid waste (non-putrescible)	Stotts Creek Resource Recovery Centre	300 m ² 6 tonnes 100 m ²	Resource recovery	Asbestos assessment may be necessary
	Miscellaneous Debris	General solid waste (non-putrescible)	Stotts Creek Resource Recovery Centre	As required	Disposal	
Demolition of ancillary structures	Plaster board Steel (reo) Roof Sheeting	General solid waste (non-putrescible)	Stotts Creek Resource Recovery Centre	100 m ² 2 tonnes 70 m2	Resource recovery	Asbestos assessment may be necessary
	Miscellaneous Debris	General solid waste (non-putrescible)	Stotts Creek Resource Recovery Centre	As required	Disposal	
Tree removal and landscaping	Sediment/soil/ Green Waste	Mulch Order Assessment required	Re-used off site	Nil advised	Resource recovery	Subject to EPA waste exemption results
Earthworks / Excavations			Re-used off site	Nil advised	Resource recovery	Subject to EPA waste exemption results

Construction Activity	Waste Type	Waste Classification	Proposed reuse/recycling/disposal methods	Waste Quantity	Reuse / Recycle Target	Comments
Construction of new buildings	Timber/concrete	General solid waste (non-putrescible)	Stotts Creek Resource Recovery Centre	As required	Disposal	
Demolition/replacement of existing footpaths	Concrete	Recovered Aggregate assessment Required	Re-used off site	120 m ³	Disposal	Subject to EPA waste exemption results

Construction Activity	Waste Type	Waste Classification	Proposed reuse/recycling/disposal methods	Waste Quantity	Reuse / Recycle Target	Comments

6 Environmental mitigation and management measures



Table 6-1: Waste, resource, and water management and mitigation measures

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
WE1	Waste management hierarchy to be followed.		Ongoing	All staff	Best practice,
WE2	Unnecessary resource consumption to be avoided where possible.		Ongoing	All staff	Best practice,
WE3	Where waste generation cannot be avoided, waste shall be reused, recycled or recovered, where possible.		Ongoing	All staff	Best practice,
WE4	Weighbridge receipts must be collected from waste transportation services and records maintained.		Ongoing	Project Manager or their delegate	Best practice,
WE5	Maintain a waste management register.	Waste management register	Ongoing	Project Manager or their delegate	Best practice,
WE6	All waste must be appropriately and securely contained on-site prior to disposal. Labelled, covered waste receptacles should be provided and recycling of general waste undertaken.	Skips, bins, signage etc.	Ongoing	Project Manager or their delegate	Best practice, Conditions of Consent (C29)
WE7	Working areas are to be maintained, kept free of rubbish and cleaned up at the end of each working day.	Skips and Bins	Ongoing	All staff	Best practice,
WE8	There is to be no disposal or re-use of construction waste on to other land (with exception of beneficial reuse).		Ongoing	Project Manager or their delegate	Best practice, POEO Act
WE9	Waste is not to be burnt on site.		Ongoing	All staff	Best practice,
WE10	Pollution incidents must be reported to each relevant authority in accordance with Section 148 of the Protection of the Environment Operations Act 1997.		Ongoing	Project Manager or their delegate	Best practice, POEO Act

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference
WE11	Waste material is not to be left on site once the construction works have been completed.		Post construction	Project Manager or their delegate	Best practice,
WE12	All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA 2014)	Environmental Consultant	Ongoing	Project Manager or their delegate	Waste Classification Guidelines, Conditions of Consent (C30)
WE13	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site, and are prevented from entering any natural or artificial watercourse		Ongoing	Project Manager or their delegate	Best practice, Conditions of Consent (C31)
WE14	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.		Ongoing	Project Manager or their delegate	Best practice, Conditions of Consent (C32)
WE15	The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance with the requirements of the relevant legislation, codes, standards and guidelines.		Ongoing	Project Manager or their delegate	Best practice, Conditions of Consent (C33)

7 Compliance management

7.1 Roles and responsibilities

The Richard Crookes Construction Project Team's organisational structure and overall roles and responsibilities are outlined in the CEMP.

7.2 Training

All employees, contractors and utility staff working on site will undergo site induction training relating to waste and resource management issues. The induction training will address elements related to waste and resource management including the waste mitigation and management measures outlined in this Plan.

Targeted training in the form of toolbox talks or specific training will also be provided to personnel with a key role in waste and resource management.

Further details regarding staff induction and training are outlined in the CEMP.

7.3 Monitoring and inspection

Additional requirements and responsibilities in relation to inspections are documented the CEMP.

7.4 Auditing

Where necessary, audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this sub plan, EIS and other relevant approvals, licenses and guidelines.

Audit requirements are detailed the CEMP.

7.5 Reporting

Reporting requirements and responsibilities are documented in the CEMP.

8 Review and improvement

8.1 Continuous improvement

Continuous improvement of this Plan will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

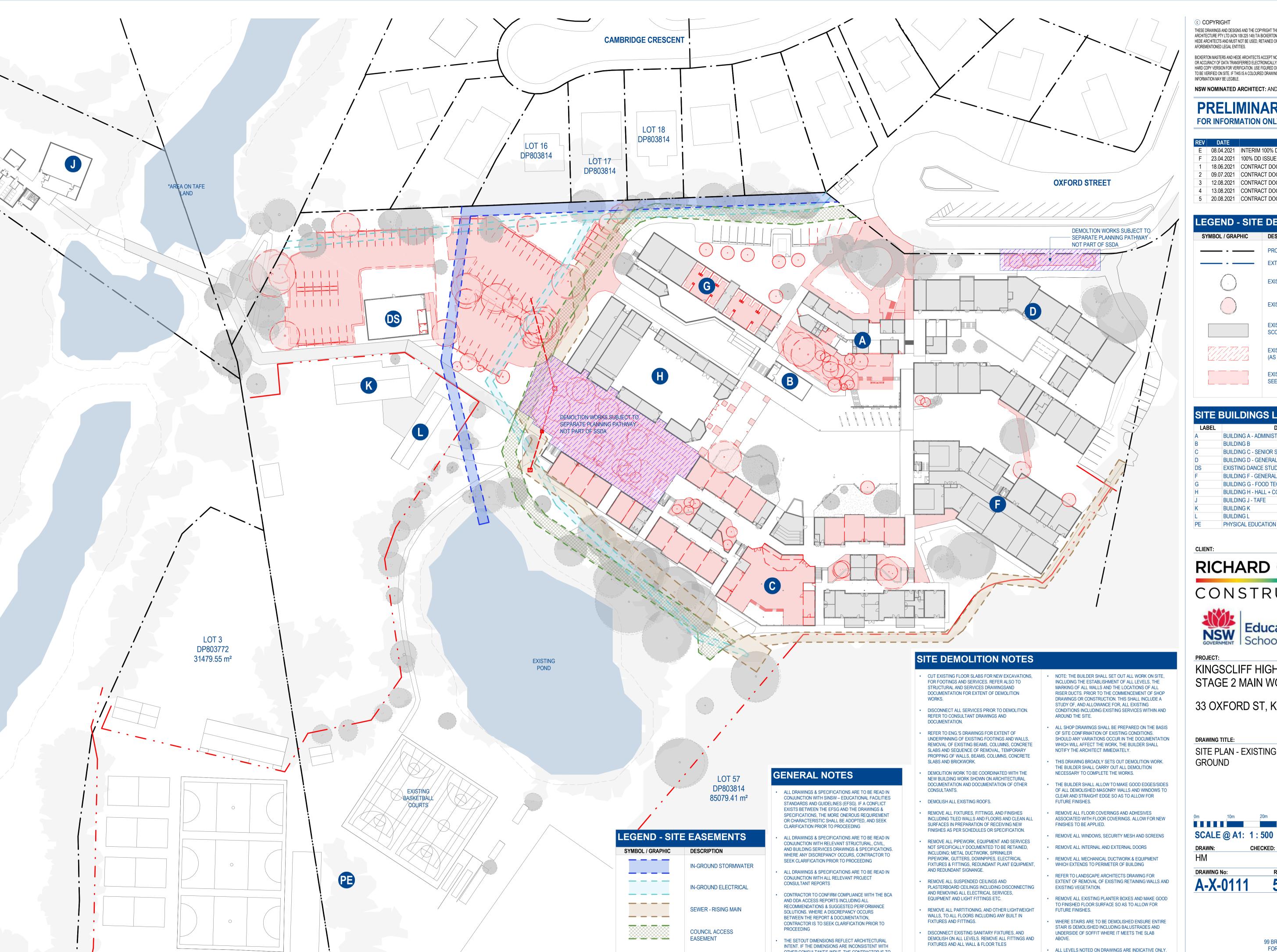
The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance
- Determine the cause or causes of non-conformances and deficiencies
- Develop and implement a plan of corrective and preventative action to address any nonconformances and deficiencies
- Verify the effectiveness of the corrective and preventative actions
- Document any changes in procedures resulting from process improvement
- Make comparisons with objectives and targets.

Appendix A: Waste Management Register				

	Waste Management Register								
Date / Time	Waste Classification	Description of Waste	Quantity/ Volume	Transporter	Facility to Receive	Waste Use (e.g. Reuse/Recycled/ Disposed)	Weighbridge Receipt No		





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PRELIMINARY ISSUE

FOR INFORMATION ONLY

REV	DATE	DETAILS	ISSUER
Е	08.04.2021	INTERIM 100% DD ISSUE	HM
F	23.04.2021	100% DD ISSUE	HM
1	18.06.2021	CONTRACT DOCUMENTATION ISSUE	HM
2	09.07.2021	CONTRACT DOCUMENTATION ISSUE	HM
3	12.08.2021	CONTRACT DOCUMENTATION ISSUE	HM
4	13.08.2021	CONTRACT DOCUMENTATION ISSUE	HM
5	20.08.2021	CONTRACT DOCUMENTATION ISSUE	HM

LEGEND - SITE DEMOLITION PLAN

SYMBOL / GRAPHIC	DESCRIPTION
	PROPERTY BOUNDARY
	EXTENT OF WORKS
	EXISTING TREE TO REMAIN
	EXISTING TREE TO BE REMOVED
	EXISTING TO REMAIN (OUT OF SCOPE)
	EXISTING TO BE DEMOLISHED (AS SEEN WHEN CUT)
	EXISTING TO BE DEMOLISHED (AS SEEN IN PROJECTION)

SITE BUILDINGS LEGEND				
LABEL	DESCRIPTION			
A	BUILDING A - ADMINISTRATION			
В	BUILDING B			
С	BUILDING C - SENIOR SCHOOL + LIBRARY			
D	BUILDING D - GENERAL LEARNING AREAS			
DS	EXISTING DANCE STUDIO			
F	BUILDING F - GENERAL LEARNING AREAS			
G	BUILDING G - FOOD TECH			
Н	BUILDING H - HALL + COLA			
J	BUILDING J - TAFE			
K	BUILDING K			
L	BUILDING L			

RICHARD CROOKES

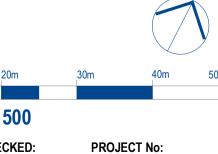
CONSTRUCTIONS



KINGSCLIFF HIGH SCHOOL -STAGE 2 MAIN WORKS

33 OXFORD ST, KINGSCLIFF, NSW

SITE PLAN - EXISTING & DEMOLITION -



20.08.2021

SCALE @ A1: 1:500 CHECKED:

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(07) 3257 3622 99 BROOKES STREET FORTITUDE VALLEY 4006, QLD