



Construction Environmental Management Plan

Girraween Waste Recycling and Transfer Facility,
224-232 Toongabbie Road, Girraween

Prepared for Benedict Industries Pty Ltd
March 2021





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Construction Environmental Management Plan

Girraween Waste Recycling and Transfer Facility, 224-232 Toongabbie Road, Girraween

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Client

Benedict Industries Pty Ltd

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Approved by



Ian Shenton

Associate

5 March 2021

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1 Introduction

1.1 Project overview

Benedict Industries Pty Ltd (Benedict Industries) is developing a waste recycling and transfer facility (the facility) at 224-232 Toongabbie Road, Girraween (the site) in the Cumberland local government area (LGA) (the project). The facility will operate as a waste recycling and transfer facility with a capacity of up to 220,000 Tonnes per annum (Tpa) of general solid waste (non-putrescible) including construction and demolition (C&D) waste, commercial and industrial (C&I) waste, uncontaminated soils, vegetation, excavated natural materials (ENM) and metals. The facility will receive and sort wastes for dispatch to appropriately licensed recycling or landfill facilities. Site location is shown in Figure 1.1. Boundaries and indicative site layout are shown in Figure 1.2 and further described in Section 2.

This Construction Environmental Management Plan (CEMP) has been developed to meet the requirements of Condition C1–C4 (Part 1) of development consent SSD 9766. The CEMP applies to site establishment and construction activities of the project.

Unless specifically noted otherwise, references to plans and consent conditions for SSD 9766 in this document and Appendix documents mean SSD 9766.

Construction activities associated with the project will include fencing, concrete/asphalt works (eg internal roads, yard, parking area, perimeter curb), construction of the waste transfer sorting and storage sheds (the sheds), waste stockpiling areas, weighbridges, wheel-washes, on site detention, internal sprinkling site irrigation system, installation of offices and amenities, and landscaping.

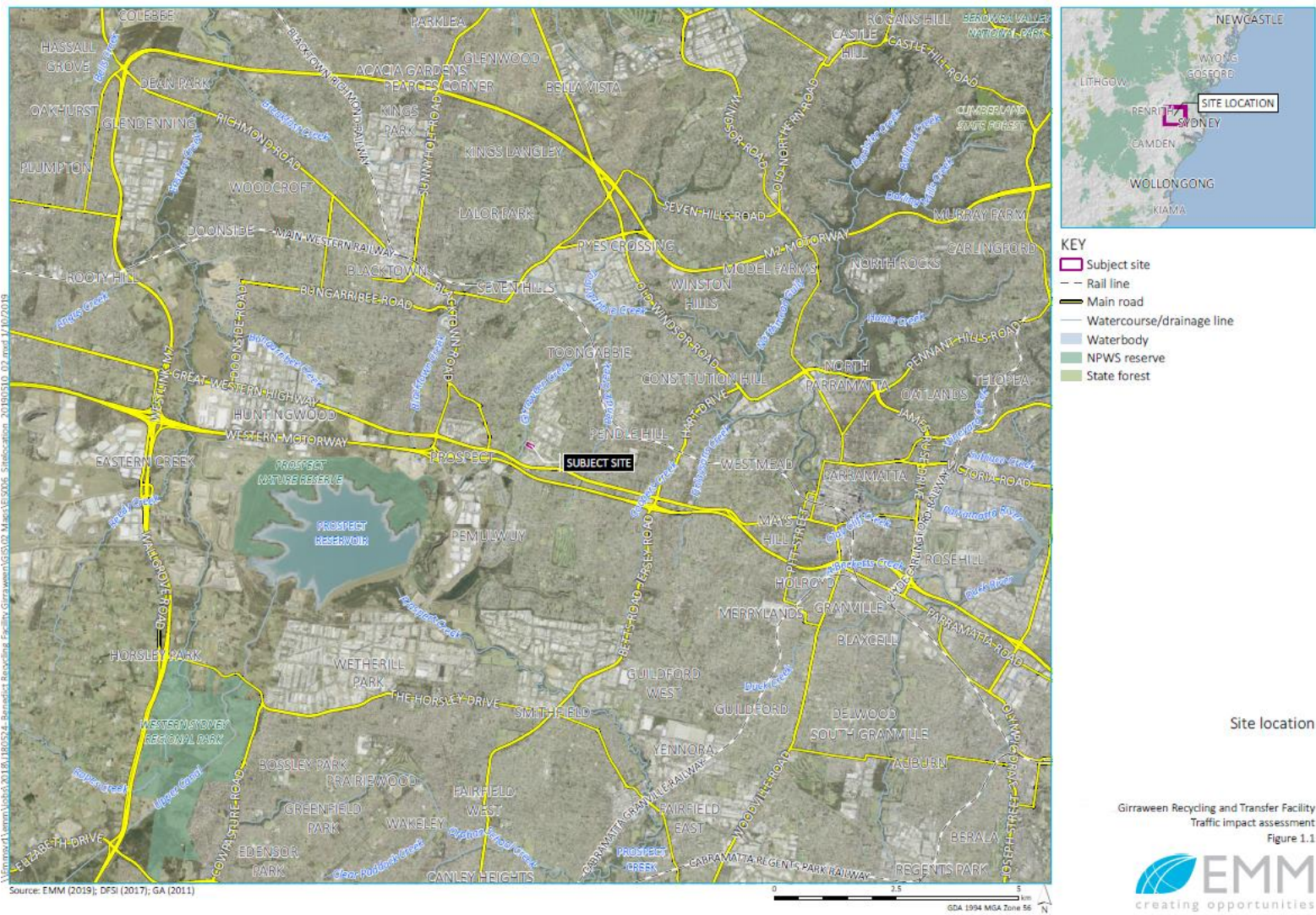
Ground disturbance and excavation is anticipated for the weighbridges and on-site detention works as well as footings for fencing, main sheds and sealing the yard. The site has existing utilities and stormwater connections.

1.2 CEMP scope and purpose

The CEMP has been developed to:

- describe the environmental management systems and practices to be implemented by Benedict Industries employees and contractors during the construction phase of the project;
- provide an overarching framework for the construction works; by outlining the steps for taking a structural approach to the management of on-site environmental aspects and risks during the construction phase;
- set out clear roles and responsibilities for management and operational personnel, and outlines the inductions and training, requirements, management procedures and measures, that direct all on-site personnel; and
- describe how Benedict Industries will implement monitoring programs and manage potential environmental impacts of the project during construction, and in accordance with applicable legislative requirements, external approvals and associated conditions of approval.

Figure 1.1 Site location



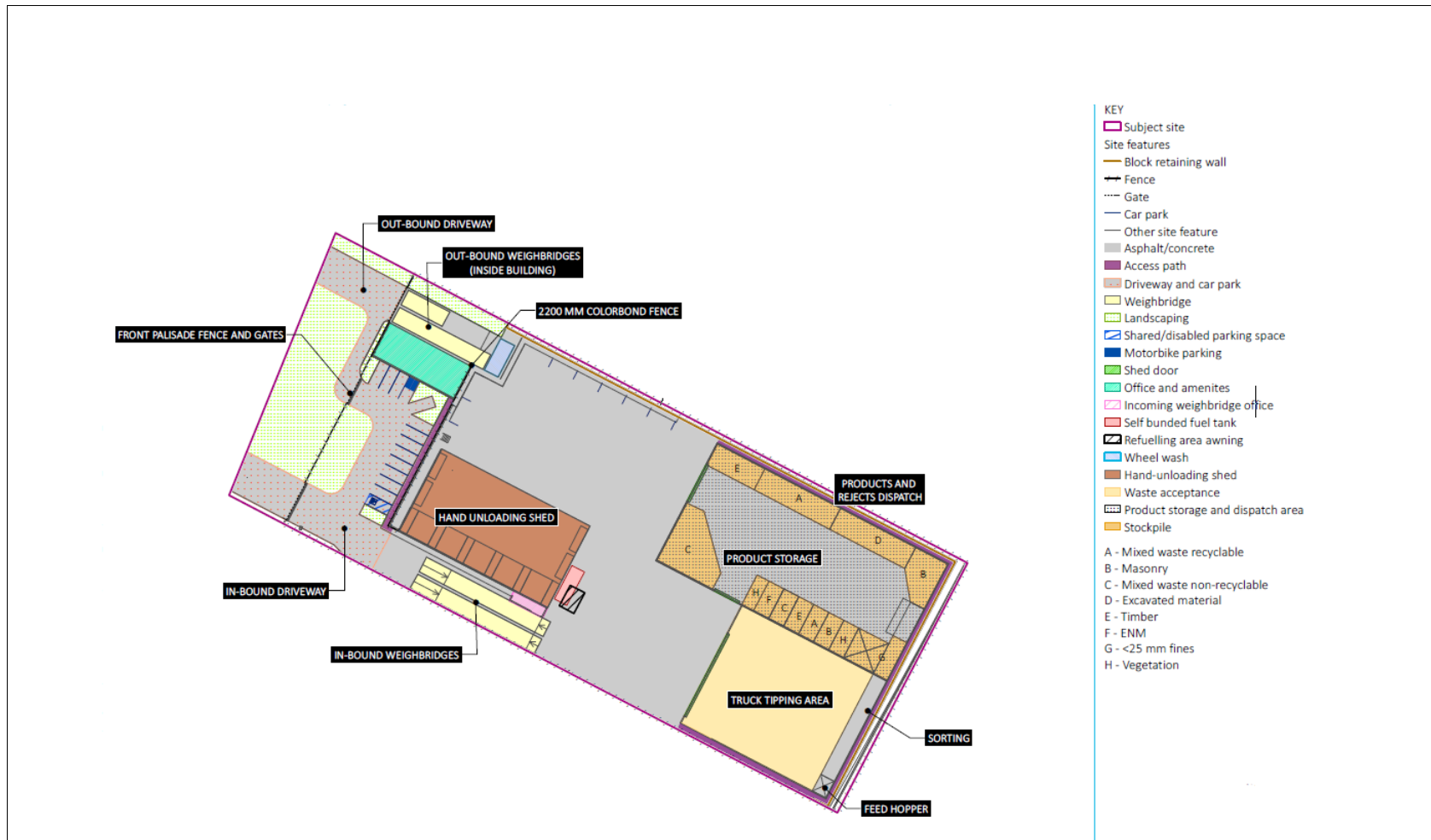


Figure 1.2 Site layout

1.3 CEMP framework and approval

The CEMP provides the link between planning and execution of construction activities. The CEMP will ensure that approval conditions under development consent SSD 9766 and obligations under applicable legislative requirements are transferred into clear and practical action. The conditions of consent and where they are addressed in the CEMP are outlined in Section 3.1.3. Relevant legislative requirements are outlined in Section 3.

This CEMP will be submitted for approval to the NSW Department of Planning and Environment (DPE) Secretary prior to the commencement of construction and revised and approved as required.

The CEMP will take effect prior to the commencement of site establishment and construction activities.

1.4 Project environmental assessment and approval overview

On 17 June 2020, DPE granted Development Consent SSD 9766.

The environmental impact statement (EIS) for the project was sought under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as a state significant development (SSD) in June 2017. The EIS was prepared in accordance with Secretary's environmental assessment requirements Clauses 71 and 72 of the Environmental Planning and Assessment Regulation 2000 (EP&AR) and advice provided by Penrith City Council (Council) following a pre-development application meeting.

The EIS was placed on exhibition for four weeks from 20 November 2019 to 18 December 2019 (28 days), and subsequently ten submissions were received of which only one was an objection. NSW government agencies, Council did not object to the development, however, raised aspects of the development for consideration in the assessment.

Potential environmental impacts and control measures outlined in the EIS and Appendix 2 of development consent SSD 9766 (Applicants Management and Mitigation Measures) have been taken into consideration and incorporated into this CEMP.

1.5 Project schedule

Site establishment and construction works are anticipated to commence in the third quarter of 2021 and to last 20 weeks. There will be overlap between the construction activities detailed. A further breakdown of construction activities is outlined in Section 2.3.

Table 1.1 Indicative 20-week project schedule

| Stage | Task |
|------------|--|
| Demolition | Existing driveway |
| | Existing office buildings |
| | Existing weighbridge and associated weighbridge office |
| Earthworks | Widening (to 7m) of existing in-bound driveway on southern side of the site frontage |
| | New out-bound driveway (7 m width) on the northern side of the site frontage |
| | Preparation for new car parking area at the front of the site |
| | Sealed working surfaces |

Table 1.1 **Indicative 20-week project schedule**

| Stage | Task |
|--------------|---|
| Construction | New car parking area comprising 13 car and two motorcycle spaces |
| | Main waste acceptance and storage shed, and associated waste sorting bays (Shed A – 1588m ² and Shed B – 798m ²) |
| | Office and amenity facility within existing building at front of the site (150m ²) |
| | Relocation of the hand unloading shed (Shed C – 720m ²) |
| | Installation of three new and relocation of one above-ground weighbridges |
| | Installation of outbound wheel wash bay |
| | Installation of above ground 133 kilo litre (kl) OSD tank and other smaller tanks |
| | Installation of below ground 230 m ³ on-site stormwater detention (OSD) tank |
| | Installation of fire suppression system within main shed |
| | Installation of fuel storage facilities |
| | 700 m ² landscaping provided to street frontage |

2 Project overview

2.1 Project description

The project is located at 224-232 Toongabbie Road, Girraween, legally described as Lot 678 DP 9157. The site comprises some 9,000 square meters (m²) of relatively flat terrain and is situated within an industrial precinct. The site includes three different sheds, hardstand, weighbridge areas, the carpark, and the front landscape area.

The project will import inert general solid waste (non-putrescible) such as construction and demolition wastes, and selected commercial and industrial wastes, for sorting to extract recycled materials as well as produce waste streams that will require further processing at other recycling facilities. The recycled materials extracted will include metals, dry paper/cupboard, brick and concrete, timber (engineered and natural), gyprock, soil-rich “heavies” and “lights” both requiring further processing at Benedict-owned or other EPA licensed facilities. Non-recyclable residues will be produced and sent to landfill.

No special liquid, hazardous, restricted solid waste or general solid waste (putrescible), as defined in the NSW *Protection of the Environment Operations Act 1997* (POEO Act) and EPA (2014), would be accepted at the facility. All of the materials brought onto the site will be taken from the site as recyclable products or as rejects for disposal at an EPA licensed landfill. There would be no materials land-filled or otherwise disposed of anywhere within the site as a result of the activities undertaken on-site.

Construction activities will involve some demolition of existing office buildings, relocating of existing infrastructure (shed, weighbridge and rainwater tanks) from the current operations, some site establishment, excavations for inground weigh bridges and OSD works, ground disturbance and foundation work for the site shed components identified in the following table. Key elements of the project are summarised in Table 2.1.

Table 2.1 Key project elements

| Project element | Project description |
|----------------------------|--|
| Maximum throughput tonnage | 220,000 tonnes of waste per annum |
| Site components | <ul style="list-style-type: none">• waste receipt will be in truck tipping area (see Figure 1.2) in the unloading shed which will contain the majority of waste sorting activities and some stockpiles;• waste transfer will occur in the product storage shed (see Figure 1.2) where segregated materials (heavy waste, timber, brick/concrete and metal) are stored in bins as well as landfill residues;• hand unload shed (see Figure 1.2) for members of the general public;• 2 weighbridge areas with four weighbridges, wheel-washes for the truck outbound traffic lanes, offices and amenities;• carparking for 13 cars and two motorcycles;• site security fencing;• onsite detention arrangements with below and above ground tanks;• internal shed misting system to minimise airborne dust;• internal customized thermal camera and water cannons for fire prevention; and• the entire site would be sealed (asphalt or concrete) with a perimeter curb. |

Table 2.1 **Key project elements**

| Project element | Project description |
|--|--|
| Hours of construction | <ul style="list-style-type: none"> • 7 am to 6 pm, Monday to Friday • 8 am to 1 pm, Saturday • no construction works to be undertaken on Sundays to public holidays. <p>Activities outside standard construction hours may be permitted where there is a safety requirement or emergency work needs to be undertaken.</p> |
| Hours of facility operation | <p>Accept waste deliveries:</p> <ul style="list-style-type: none"> • 24 hours a day, 7 days per week <p>Processing:</p> <ul style="list-style-type: none"> • 7 am to 10 pm, Monday to Friday • 7 am to 5 pm, Saturday • No processing on Public Holidays <p>Materials Dispatch:</p> <ul style="list-style-type: none"> • 24 Hours a day, Monday to Friday • 6 am to 5 pm, Saturday • 8 am to 5 pm, Sunday |
| Transport and access during the construction phase | <ul style="list-style-type: none"> • Access will be via Toongabbie Road. • All work vehicles will be parked within the site. <p>There will be an average of about 390 daily vehicle movements (i.e. 195 vehicles) including 46 heavy vehicle movements, 32 light vehicle movements and 312 waste delivery movements. Construction traffic will comprise approximately 40 daily movements (10 light vehicles and 10 heavy vehicles) for all site construction activities during the construction period</p> |

6 x 2-week 24/7 periods per annum with prior 24-hour Planning Secretary and EPA notification

2.2 Project setting

The site is partially sealed with a single sorting shed, a temporary undercover storage area, a weighbridge and office, and two separate office buildings currently on site. The site is surrounded on 3 sides by industrial and commercial uses and has 61 m frontage to Toongabbie Road.

The site is ideally suited for the development of a waste recycling and transfer facility because it is zoned IN1 General Industrial pursuant to the *Holroyd Local Environmental Plan 2013* (HLEP). It is surrounded by industrial land uses to the north, south and east.

The site is readily accessible to light and heavy vehicles and is situated on the eastern side of a two-lane, road (Toongabbie Road) which is significant road that provides access to many industrial properties. The site is surrounded to the east (GMP Pharmaceuticals), north (Hanson) and south (Bearcat wheel manufacturing). The Fox Hills golf course is to the west of the site and the nearest residential is some 400m to the north-west.

There are no public recreation areas within the vicinity of the facility. There are no community services such as schools that are closer to the facility than the residences to the north-west.

The site was acquired by the Applicant in November 2018 and previously operated as an approved scrap metal recycling facility under development consent (DA 2003/615/01) from the former Holroyd City Council (now Cumberland City Council). After an extensive clean-up of residual waste on the site left by the previous owner, Benedict Recycling is currently operating the site under the DA 2003/615/01 Consent with a single shed receiving

30,000 Tpa of waste for sorting and transfer. The site is currently operating under Environment Protection Licence No. 21214

The site has an existing weighbridge, utilities and stormwater connections.

2.3 Construction works and staging

In accordance with Condition C2 (Part C) of development consent SSD 9766, Table 2.2 outlines all activities to be undertaken on-site during the construction of the project.

Table 2.2 Construction activities and staging

| Activity | Details |
|---------------------------------|--|
| Site establishment | <ul style="list-style-type: none"> fencing off the road corridor; installation of initial environmental controls including public safety signage; establishment of construction site facilities and access; and implementation of required construction related signage. |
| Site preparation and earthworks | <ul style="list-style-type: none"> demolition of the required existing buildings; deployment of site sediment and erosion controls and pollution management measures in accordance with the Water Management Plan (WMP); temporary front entrance gate will be in place until permanent structures are installed at a later construction stage; deployment of temporary traffic control devices (Section 5.6.1); and the site has existing utilities, however consultation with relevant service providers will take place should services require relocation (ie electricity, gas, water and telecommunications infrastructure). |
| Surface water management system | <ul style="list-style-type: none"> ensure that the run-off continues to be directed towards existing drains; excavate and install underground OSD tanks and pipework; and install and relocate aboveground OSD tanks. |
| Shed and amenities | <ul style="list-style-type: none"> construction of the truck tipping shed, and the product storage shed; install shed services (plumbing, power and lighting); excavate and install new exit weighbridges; remove old weighbridge; relocate hand unload shed to centre of the site; excavate and install new entry weighbridges on the southern boundary; and installation of above and below ground OSD tanks and roof connections. |
| Concrete/asphalt works | <ul style="list-style-type: none"> hard surfacing of the site in a material such as concrete or bitumen; construction of different pavement layers on-site; and marking on-site parking spaces for staff including on-site visitor parking spaces, located within the western boundary of the site. |
| Utilities | <ul style="list-style-type: none"> connection to services; and install refuelling facilities. |

Table 2.2 **Construction activities and staging**

| Activity | Details |
|--|---|
| Construction of demountables, structures and purpose-built areas | <p>Construction and/or installation of the following:</p> <ul style="list-style-type: none"> • a demountable entry weighbridge office; • renovate and refurb existing partially demolished office building for outgoing weighbridges and staff amenities; • a misting irrigation system to minimise airborne dust inside the shed; • proprietary infra-red firefighting system installed in rear shed; • installation of front security palisade fencing and gates; and • construct waste/product stockpile bays inside the sheds and install processing equipment. |
| Finishing works and landscaping | <ul style="list-style-type: none"> • removal of any temporary works; • installation of lighting, safety barriers, site security fencing, line markings, OHS signage around the site; • progressive rehabilitation, restoration of frontage landscaping of disturbed/temporary areas; • site clean-up and disposal of all surplus waste construction materials; and • Install operational site signage. |

Construction activities will also involve:

- road deliveries of equipment and materials to be used in the construction process; and
- Council or contractor pickup of waste accumulated during the construction process (ie rubbish from employee lunches, green waste, and construction waste).

All construction works will be wholly contained within the existing boundaries of the site.

3 Legislative and other requirements

3.1 Statutory requirements

Key applicable legislation relevant to the project includes, but is not limited to:

- Commonwealth legislation:
 - *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).
- State legislation:
 - EP&A Act;
 - EP&AR;
 - POEO Act;
 - *Water Management Act 2000* (WM Act);
 - *Contaminated Land Management Act 1997* (CLM Act);
 - *Rural Fires Act 1997*.
- *National Parks and Wildlife Act 1974* (NPW Act); and
- *Heritage Act 1997* (Heritage Act).

After reviewing the EIS, Office and Environment and Heritage (OEH) raised no objections and requested no additional information.

The OEH noted that the project does not contain biodiversity, natural hazards or Aboriginal cultural heritage issues.

The OEH also provided comment from the Heritage Council of NSW confirming that there are no potential impacts to heritage items within a 1.2 km radius of the site and that a heritage assessment is not required.

An unexpected finds protocol for heritage items is still requirement under condition B29 and B30 of development consent SSD 9766. The protocol is included in Section 5.4 of this CEMP.

3.1.1 Approvals, permits and licences

As outlined in Section 1.3 of this CEMP the project has been determined under Part 4 of the EP&A Act, with the granting of development consent SSD 9766, which forms the basis for outlining necessary conditions and measures to be included in this CEMP.

The project will also be regulated by an Environment Protection Licence (EPL) issued under s48 of POEO Act. Therefore, there are no provisions provided to creating pollution of any type during the planning or execution of the construction work. Under the POEO Act, the following personnel have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- the person carrying out the activity;

- an employee or agent carrying out the activity;
- an employer carrying on the activity; and
- the occupier of the premises where the incident occurred.

Notifications must be given immediately in accordance with project approved communications protocols, after the person becomes aware of the incident (see Section 4.3). Only persons engaged in the activity resulting in the pollution incident, and occupiers of the land where the incident occurred, have a duty to report the incident.

3.1.2 Compliance policies, standards and guidelines

Environmental aspects and mitigation measures during the construction phase will be undertaken in accordance with the following policies, standards and guidelines:

i Noise

- NSW Department of Environment and Climate Change (DECC) 2009, *Interim Construction Noise Guideline (ICNG)*;
- NSW Department of Environment and Conservation (DEC) 2006, *Assessing Vibration: a technical guideline*;
- German Standard DIN 4150-3 (2016-12) *Part 3 Structural Vibration in Buildings. Effects on Structures*; and
- Australian Standard AS 2436-2010 (R2016) *Guide to Noise Control on Construction, Maintenance and Demolition Sites*.

ii Surface water, sediment and erosion control

- Engineers Australia 2016, Australian Rainfall and Runoff;
- Environment Protection Authority 1997, *Managing Urban Stormwater: Council Handbook*;
- Landcom, 2004, *Managing Urban Stormwater: Soils and Construction (Blue Book)*; and
- Penrith Council Water Sensitive Urban Design (WSUD) Guidelines.

iii Hazards and risk – Dangerous goods, bunding, spills and leaks

- Australian Dangerous Goods Code;
- DPE's *Hazardous and Offensive Development Application Guidelines – Applying SEPP 33*;
- EPA 1997, *Environment Protection Manual for Authorised Officers: Bunding and Spill management, technical bulletin*;
- EPA 2007, *Storing and Handling Liquids: Environmental Protection – Participants Manual*; and
- other relevant Australian Standards.

iv Contamination and waste

- Safework NSW 2016, Safework NSW Code of Practice: How to Manage and Control Asbestos in the Workplace; and
- EPA 2017 Waste Classification Guidelines – Part 1: Classification of Waste.

Previous and ongoing consultation with the Council, DPE, EPA, OEH, DPI, RMS and other government agencies as required, will also continue to inform management and control measures during the construction phase of the project.

3.1.3 Development consent conditions

The requirements for the CEMP are stated under Condition C3 (Part C) of development consent SSD 9766. Conditions requiring inclusion in the CEMP are listed in Table 3.1.

Table 3.1 Development consent SSD 9766 conditions relevant to CEMP

| Condition number | Condition description | Relevant section of report or other document |
|------------------|--|--|
| Part A | Obligation to minimise harm to the environment | |
| A1 | In addition to meeting the specific performance criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable or feasible, minimize, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this Consent. | Chapter 5 |
| Part A | Terms of the consent | |
| A2 | The Development may only be carried out in: | |
| | a) in compliance with the conditions of this consent; | Section 3.1.1 |
| | b) in accordance with the directions of the Planning Secretary; | Section 1.3 |
| | c) in accordance with the EIS and Response to Submissions (RTS); | Section 1.4 |
| | d) in accordance with development layout in Appendix 1; and | - |
| | e) in accordance with the management and mitigation measures in Appendix 2. | Chapter 5 |
| Part A | Notification of commencement | |
| A10 | The date of commencement of each of the following phases of the development must be notified to the Department in writing, at least one month before that date: | Noted |
| | a) Construction; | |
| | b) Operation; | |
| | c) Cessation of operations; and | |
| | d) Decommissioning. | |
| Part A | Surrender of existing consents or approvals | |
| A12 | Within 12 months of the date of commencement of development to which this consent applies, or within another timeframe agreed by the Planning Secretary, the Applicant must surrender the existing development consent dated 20 September 2005 for the Building and Commercial Waste Recycling Facility in accordance with the EP&A Regulation. | Noted |

Table 3.1 Development consent SSD 9766 conditions relevant to CEMP

| Condition number | Condition description | Relevant section of report or other document |
|------------------|---|--|
| Part A | Protection of public infrastructure | |
| A21 | Prior to the commencement of construction, the Applicant must: <ul style="list-style-type: none"> a) consult with the relevant owner and/or provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure. b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters, and footpaths); and c) submit a copy of the dilapidation report to the Planning Secretary and Council | <p>Section 4.3.2</p> <p>Section 4.4.2</p> <p>Section 4.4.2</p> |
| Part A | Demolition | |
| A23 | All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. Note: <ul style="list-style-type: none"> • Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. | Noted |
| Part A | Compliance | |
| A25 | The Applicant must ensure that employees, contractors (and their sub-contractors) are made aware of, and instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development. | Section 4.2 |
| Part A | External Walls and Cladding | |
| A27 | The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA. | Noted |
| A28 | Before the issue of a Construction Certificate and an Occupation Certificate, the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use or used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA. | |
| A29 | The Applicant must provide a copy of the documentation given to the Certifying Authority under condition A28 to the Planning Secretary within seven days after the Certifying Authority accepts it. | |
| Part A | Utilities and Services | |
| A30 | Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers. | Noted |
| A31 | Before the commencement of operation of the development, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994. | |
| Part B | Construction Traffic Management Plan | |
| B1 | Prior to the commencement of construction, the Applicant must prepare a Construction Traffic Management Plan [CTMP] for the development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by condition C2 and must: <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); | Appendix A |

Table 3.1 Development consent SSD 9766 conditions relevant to CEMP

| Condition number | Condition description | Relevant section of report or other document |
|------------------|---|--|
| | <ul style="list-style-type: none"> b) be prepared in consultation with Council; c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction; d) detail heavy vehicle routes, access and parking arrangements; e) include a Driver Code of Conduct to: <ul style="list-style-type: none"> – minimise the impacts of earthworks and construction on the local and regional road network; – minimise conflicts with other road users; – minimise road traffic noise; and – ensure truck drivers use specified routes. f) include a program to monitor the effectiveness of these measures; and g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes. | |
| B2 | <p>The Applicant must:</p> <ul style="list-style-type: none"> a) not commence construction until the CTMP required by Condition B1 is approved by the Secretary; and b) implement the most recent version of the CTMP approved by the Planning Secretary for the duration of construction. | Appendix A |
| Part B | Air Quality | |
| B18 | The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent. | Section 5.3 |
| B19 | <p>During construction, the Applicant must ensure that:</p> <ul style="list-style-type: none"> a) exposed surfaces and stockpiles are suppressed by regular watering; b) all trucks entering or leaving the site with loads have their loads covered; c) trucks associated with the development do not track dirt onto the public road network; d) public roads used by these trucks are kept clean; and e) land stabilisation works are carried out progressively on site to minimise exposed surfaces. | |
| B21 | <p>Prior to the commencement of operations, the applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by condition C5 and must:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); b) detail and rank all emissions from all sources of the development, including particulate emissions; c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators; d) identify the control measures that that will be implemented for each emission source; and e) nominate the following for each of the proposed controls: <ul style="list-style-type: none"> i) key performance indicator; ii) monitoring method; iii) location, frequency and duration of monitoring; | Not applicable to CEMP |

Table 3.1 Development consent SSD 9766 conditions relevant to CEMP

| Condition number | Condition description | Relevant section of report or other document |
|------------------|---|--|
| | <ul style="list-style-type: none"> iv) record keeping; v) complaints register; vi) response procedures; and vii) compliance monitoring. | |
| B26 | <p>Construction Noise Limits</p> <p>The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction 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.</p> | Section 5.1 |
| | <p>Soils, water quality and hydrology – erosion and sediment control</p> | |
| B29 | <p>Prior to the commencement of any construction the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by Condition C2.</p> | Section 5.2 |
| B31 | <p>Stormwater Management System</p> <p>Prior to the commencement of operation, the Applicant must design, install and operate a stormwater management system for the development. The system must:</p> <ul style="list-style-type: none"> a) be designed by a suitably qualified and experienced person(s); b) be designed in consultation with Council; c) be generally in accordance with the conceptual design in the EIS; d) be in accordance with applicable Australian Standards; e) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines; f) divert existing clean surface water around operational areas of the site; and g) direct all sediment laden water in overland flow away from the leachate management system. <p>Aboriginal Heritage – Unexpected Finds Protocol</p> | <p>Section 5.2</p> <p>Appendix B</p> |
| B34 | <p>If any item or object of Aboriginal heritage significance is identified on site:</p> <ul style="list-style-type: none"> 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) the EES must be contacted immediately. | <p>Section 5.4</p> <p>Appendix C</p> |
| B35 | <p>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.</p> | |

Table 3.1 Development consent SSD 9766 conditions relevant to CEMP

| Condition number | Condition description | Relevant section of report or other document |
|------------------|---|---|
| | Bunding | |
| B39 | The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or the EPA's Storing and Handling Liquids: Environmental Protection – Participants Manual (Department of Environment and Climate Change, 2007) | Noted |
| | Fire Safety | |
| B40 | Prior to the commencement of construction, the final fire and life safety design of the development, including firewater containment, must be finalised in consultation with FRNSW to the satisfaction of the Planning Secretary and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of Volume One of the National Construction Code (NCC) Series. | Noted |
| B41 | Fire and life safety measures are required to be reassessed in consultation with FRNSW if the development consent is modified to change the site configuration, approved processing capacity or accepted waste streams. | |
| | Contamination | |
| B42 | Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part 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. | Section 5.6 Appendix C |
| B43 | Lighting | |
| | The Applicant must ensure the lighting associated with the development: | Noted |
| | a) complies with the latest version of AS 4282-1997 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and | |
| | b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. | |
| C2 | The Applicant must prepare a Construction Environmental Management Plan (CEMP) in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary. | This report |
| C3 | As part of the CEMP required under condition C2 of this consent, the Applicant must include the following: <ul style="list-style-type: none"> Construction Traffic Management Plan (see condition B1); Erosion and Sediment Control Plan; Unexpected Contamination Procedure (see condition B42). Community consultation and complaints handling | Appendix A Appendix B Appendix C Section 4.3.3 |
| C4 | The Applicant must: <ul style="list-style-type: none"> 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. | Noted |

Table 3.1 Development consent SSD 9766 conditions relevant to CEMP

| Condition number | Condition description | Relevant section of report or other document |
|------------------|--|--|
| C8 | <p>Within three months of:</p> <ul style="list-style-type: none"> a) the submission of an incident report under Condition C11; b) the submission of an Independent Environmental Audit under Condition C17; c) the approval of any modification of the conditions of this consent; or d) the issue of a direction of the Planning Secretary under Condition A2(b) which requires a review, | Section 4.4.1 |
| C9 | The strategies, plans and programs required under this consent must be reviewed, and the Department must be notified in writing that a review is being carried out. | Section 4.4.1 |
| C11 | The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3. | Section 7.2 |
| C20 | <p>At least 48 hours before the commencement of construction and for the life of the development, the Applicant must:</p> <ul style="list-style-type: none"> a) make the following information and documents (as they are obtained or approved) publicly available on its website: <ul style="list-style-type: none"> i) the documents referred to in condition A2 of this consent and the final layout plans for the development; ii) all current statutory approvals for the development; iii) all approved strategies, plans and programs required under the conditions of this consent; iv) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; vi) a summary of the current stage and progress of the development; vii) contact details to enquire about the development or to make a complaint; viii) a complaint register, updated monthly; ix) the Compliance Reporting of the development; x) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report; xi) any other matter required by the Planning Secretary; and b) keep such information up to date, to the satisfaction of the Planning Secretary. | Noted |

Table 3.2 **Applicants management and mitigations measures**

| Environmental Attributes | Management measures |
|---------------------------------|--|
| Air Quality | <p>The following management measures will be implemented to minimize the potential for air quality impacts:</p> <ul style="list-style-type: none"> • all material storage, sorting and transfer and loading will occur within enclosed sheds; • the main waste acceptance and storage shed will be fitted with an internal water misting system to control dust; • only paved areas will be used by heavy and light vehicles; and • material drop heights will be minimized. |
| Noise | <p>The following management measures will be implemented during construction and operations to minimise the potential for noise impacts:</p> <ul style="list-style-type: none"> • plant and equipment will be regularly maintained and serviced; • broadband reversing alarms (growlers) will be exclusively used on all mobile plant; • the site layout minimizes the need for mobile plant to reverse; • plant and equipment will be switched off when not in use; • material drop heights will be minimized and dragging materials along the ground will be minimized; • site contact details will be provided on a board at the front of the site; any noise related complaints will be handled promptly; and • a complaints register will be maintained. |
| Traffic and Transport | <p>The following management measures will be implemented to improve traffic safety:</p> <ul style="list-style-type: none"> • a total of seven street parking spaces along the eastern side of Toongabbie Road (near the site boundary) will need to be removed to allow access to the facility; and • no-parking signs are to be provided as shown in the concept parking signage plan and/or as agreed by Cumberland Council. |
| Water and soil | <p>Construction:</p> <ul style="list-style-type: none"> • construction on the site for concrete, drainage pipes and block elements will be undertaken in accordance with the NSW Department of Environment and Climate Change's guideline for saline soils which recommend use of separation methods or classes of concrete suitable for saline environments; • the runoff erosion and sediment control strategy will be implemented to manage runoff and sediment during the construction phase; • specific runoff sediment traps will be incorporated along flow path to remove sediment and debris at the source; • bund and silt fencing will be incorporated around the perimeter of the site to ensure runoff does not flow onto adjacent sites; • the sediment and runoff control measures will be maintained on a regular basis and after storm events. |
| Contamination | <p>The CEMP will identify intrusive ground construction activities and detail how these activities will be managed to avoid or mitigate negative environmental effects.</p> |
| Heritage | <p>If any aboriginal objects are identified during construction or operation of the facility, Benedict would cease work in the immediate area of the find and fence off the area. The find would be reported to DPIE and management measures would be implemented based on the significance of the item. An unexpected finds protocol will be developed further and included in the CEMP and OEMP.</p> |

4 Implementation and operation

4.1 Environmental roles and responsibilities

The facility has established roles and responsibilities for personnel to implement the requirements of this CEMP.

4.1.1 Project manager

During the construction phase of the project, the project manager is responsible for the following:

- ensures that adequate resources are provided to implement the requirements of this CEMP and to meet all legislative and contract requirements for environmental management;
- directs and supports the project team operations consistent with the requirements in this CEMP;
- conducts fortnightly reviews with key project personnel to ensure the project environmental systems and procedures are adequately implemented; and
- ensures that all contractor agreements issued to contractors and suppliers comply with the requirements of this CEMP.

4.1.2 Site manager

During the construction phase of the project, the site manager is responsible for the following:

- ensures that this CEMP is implemented;
- reports any deficiencies and shortcomings of the CEMP, regularly reviewing and improving the outlined practices;
- check mitigation measures and monitoring programs on a fortnightly basis to make sure they are compliant and effective;
- reviews Safe Work Method Statements (SWMS) or equivalent to ensure that environmental planning has been addressed and documented to an appropriate level;
- adequately reports on any on-site incidents that may occur during the construction phase through various internal and external channels; and
- manages and organises contractors involved in the construction of the project, maintenance, and repair work.

4.1.3 Environmental representative

During the construction phase of the project, the environmental representative is responsible for the following:

- the main point of contact for advice in relation to the on-site environmental performance during construction activities;
- considers and advises the project manager and site manager about conditions of approval, other licences and approvals related to the environmental performance and impacts of the project;

- monitors the implementation of this CEMP and other relevant environmental management plans and monitoring programs required under development consent SSD 9766;
- reports any deficiencies and shortcomings of the CEMP, regularly reviewing and improving the outlined practices;
- regularly checks mitigation measures and ensures that regular environmental auditing is undertaken in accordance with Section 6.3 this CEMP;
- ensures the records of planned environmental control measures are kept on site as required;
- adequately reports on any on-site incidents that may occur during the construction phase through various internal and external channels;
- is available to respond to any community concerns or complaints related to environmental performance during the construction phase of the project; and
- is involved in reviewing this CEMP and other management plans prior to submission to the Secretary.

4.1.4 OHS advisor

During the construction phase, the occupational health and safety advisor is responsible for:

- taking part in the incident response and investigation processes, which are related to occupational health and safety;
- recommending actions on incident data and trends, as required;
- contacting Emergency Services (ambulance, fire brigade or police), when required;
- preserving the incident scene; and
- coordinating help where needed at the incident response.

4.1.5 All employees and contractors on-site

During the construction phase of the project, all employees and contractors have the following responsibilities:

- comply with CEMP and environmental legislation, rules and guidelines;
- follow instructions from supervisor, foreman or leading hand as appropriate;
- work with regard to the environment, not cause damage or adverse environmental impacts; and
- report environmental incidents immediately to site manager.

4.1.6 Engineering manager

The engineering manager's responsibilities prior to and during the construction phase will involve:

- ensures that the detailed design of the project is consistent with the approved and desirable environmental outcomes; and

- liaises with the environmental representative as required to ensure that environmental aspects and constraints of the project have been appropriately considered in the design.

4.1.7 Environmental specialists

Consultants will be commissioned by Benedict Industries, as required, to provide technical input and advice on environmental matters. Consultants will also undertake surveys, inspections, implement monitoring programs or prepare environmental assessments and reports, as required.

4.2 Training and awareness

4.2.1 Site inductions

All employees and contractors must undertake a compulsory site induction that includes an environmental component prior to commencement of any work on-site. The induction is compulsory to ensure all personnel involved in the construction of the project have an awareness of the requirements of the CEMP and know how to implement adequate environmental management measures.

Short-term visitors to the site for purposes such as deliveries will not be inducted but will be accompanied by inducted personnel at all times.

The induction will cover the following:

- familiarisation with the CEMP;
- key on-site environmental issues, such as dust and noise management;
- relevant conditions of environmental licences, permits and approvals;
- specific environmental management requirements and responsibilities of everyone that works on-site;
- environmental controls and mitigation measures implemented on site to manage environmental issues;
- incident response and reporting requirements; and
- information relating to the location of environmental constraints.

4.2.2 Pre-start meetings/Toolbox talks

Benedict Industries site manager will implement a program of toolbox talks or pre-start meetings for all personnel for the duration of the construction works. Toolbox talks are an important part of raising awareness and educating personnel on issues related to all aspects of construction including safety, quality and environmental issues.

These will be scheduled on a regular basis, and no less than once a fortnight for all on-site personnel. The toolbox talks will encourage information sharing and participation of all on-site personnel, making sure that environmental awareness and continuous improvement continues throughout the construction phase of the project.

Topics to be covered will be determined by Benedict Industries and will include, but are not limited to:

- limits of work;
- water pollution controls;

- erosion and sediment control;
- emergency and spill response;
- noise management;
- dust control;
- storage and handling of chemicals;
- onsite traffic management;
- changes to previously communicated environmental mitigation measures; and
- environmental procedures and alerts.

4.2.3 Driver Code of Conduct

As per condition B5 (Part E) of development consent SSD 9766, drivers associated with the project will abide by the Drivers Code of Conduct and induction training to minimise road traffic noise and other impacts that could arise as a result.

Benedict Industries Drivers Code of Conduct is included in Appendix A.

4.3 Communication

4.3.1 Internal communication

Clear and effective communication throughout all internal levels and functions, including management and staff, is crucial to minimising environmental impacts and achieving continual improvements in environmental performance. Refer to Table 4.1 for key Benedict Industries personnel and their contact details.

4.3.2 Communication with relevant agencies and authorities

Benedict Industries and EMM have been liaising with relevant government agencies and service providers from the pre-approval stage of the project. Key government stakeholders include the DPE, EPA, OEH, Department of Primary Industries (DPI), DPI- Water, Roads and Maritime Services (RMS) and Council.

Ongoing communication is planned with government agencies and service providers, should any of the following circumstances arise:

- relevant archaeological experts and subsequently the Heritage Division of OEH will be contacted should an unexpected heritage item(s) be discovered during the construction phase of the project;
- EPA and local Council will be contacted in the case of a pollution incident or unexpected contaminated material(s) find within 24 hours;
- within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, a report will be supplied to DPE outlining basic facts. This will be followed by a detailed report submitted to DPE within 14 days after the incident or potential incident; and

- other government agencies will be contacted should issues arise relating to their area of management/jurisdiction.

Additionally, Benedict Industries will consult with relevant owner and/or provider of services that are likely to be affected by the project to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure.

Key government agency and service provider contacts are listed in Table 4.1.

4.3.3 Stakeholder and community communication

Other stakeholders that Benedict Industries and EMM have been communicating with during the pre- approval stage of the project include AGL and surrounding landowners and occupiers.

Community consultation has been undertaken during the pre-approval stage of the project, including during the preparation of the EIS, the public exhibition (seven weeks in July and August 2016) of the EIS and RTS stages.

A complaint management system to engage in active community consultation and maintain positive relations with local residents will be implemented for the duration of the development. The purpose of this system is to minimise complaints by addressing their concerns upfront and monitor the environmental performance of the site.

Prior to the commencement of construction, Benedict Industries will make the following documentation relevant to construction activities available on its website:

- EIS, RTS and approved development layout plans;
- all current statutory approvals for the development;
- all approved strategies, plans and programs required under the development consent; and
- a complaints register updated on a quarterly basis.

4.3.4 Key contacts

Table 4.1 provides a list of key internal and stakeholder contacts.

Table 4.1 **Contact name**

| Benedict Industries | Location/contact | Contact number |
|---|-------------------------|-----------------------|
| Project manager | Ewen Mckenzie | 0409 666 183 |
| Site supervisor | Peter Mills | 0425 282 206 |
| Environmental representative | Alycia Campbell | 0437 468 258 |
| HSE advisor | Peter Murdocca | 0448 268 395 |
| Stakeholders | | |
| AGL/other electricity provider for the site | To be confirmed | |
| Cumberland Council | | 02 88757 9000 |
| EPA's Environment Line | | 131 555 |
| Fire & Rescue NSW Wentworthville Fire Station | | 02 9631 0908 |

Table 4.1 **Contact name**

| Benedict Industries | Location/contact | Contact number |
|---|-------------------------|-----------------------|
| Girraween Police Station | | 02 9688 8499 |
| Wildlife Information Rescue Education Service (WIRES) | | 1300 094 737 |

4.4 Documentation

Benedict Industries environmental representative is responsible for maintaining all environmental documentation so that they are always current at the point of use. Documents to be kept up to date include:

- monitoring, inspection and audit/compliance reports and records;
- correspondence with public authorities;
- correspondence with surrounding landowners and occupiers, and any other community members;
- induction and training records;
- documentation relevant to environmental incidents and non-conformances, complaints and corrective action; and
- minutes of CEMP review meetings and evidence of actions taken.

All environmental management documents should be subject to ongoing review and continual improvement. Only the environmental representative has the authority to change any of the environmental management documentation.

Copies of documents to be kept on site at all times include:

- development consent SSD 9766;
- EPL;
- relevant construction and operation environmental management plans including:
 - this CEMP;
 - CNVMP;
 - WMP; and
 - ESCP;
- SWMS;
- first aid instructions;
- Pollution Incident Response Management Plan (PIRMP) and emergency evacuation protocols;
- OHS relevant documentation; and

- other approvals permits and licences to undertake construction activities on-site.

4.4.1 CEMP review

Condition C10 of the development consent requires that the CEMP be reviewed and revised if necessary, within three months of an approval of a modification or submission of an incident report to DPE.

4.4.2 Notification, consultation, and approval of supporting documentation

A summary of review, consultation and approval requirements for supporting documentation is provided in Table 4.2.

Table 4.2 Summary of additional notification, consultation and approval requirements

| Document | Requirement | Timing |
|---------------------|---|---|
| Dilapidation report | Prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths) and submit a copy of the report to the DPE and Council. | <p>The dilapidation report will be provided to DPIE and Council for notification purposes.</p> <p>The dilapidation report and evidence of notification will be provided to the certifying authority prior to the commencement of construction</p> |

5 Management of key environmental aspects and risks

The management procedures in the following sections apply to the construction phase and indicate the measures that will be implemented to manage environmental aspects and risks identified in the EIS, RTS, and development consent SSD 9766.

5.1 Construction noise management and control measures

Construction noise levels are predicted to satisfy the relevant NMLs at all assessment locations during standard construction hours, as measured over a 15-minute period (the LAeq,15min) (see Table 6.9 of the EIS).

Given that the predictions assume plant and equipment are operating simultaneously and at full power, it is likely that noise levels will be less than those predicted for the majority of the construction phase.

The proposed construction activities are not expected to include any vibration intensive plant. Therefore, given the nature of the proposed construction activities and distances to the nearest residences (greater than 400 m from the site), intermittent vibration levels are unlikely to cause adverse human response or cosmetic damage to residences.

Site specific noise and vibration mitigation and management measures and commitments will therefore be implemented at the facility, as well as general good practice recommendation. These are provided in Table 5.1.

Table 5.1 Construction noise and vibration management and control measures

| Potential Impact/s | Actions to manage (remove or mitigate) impact | Responsibility |
|------------------------------|--|---------------------------------|
| Management Measures | | |
| | Construction Hours: Monday – Friday 7 am to 6 pm Saturday – 8 am to 1 pm The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction 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. | Project Manager Site Manager |
| Plant & Equipment | | |
| | Construction plant and equipment will be regularly maintained and serviced Broad band reversing alarms (growlers) will be exclusively used on mobile construction plant Minimise the need for mobile construction plant to reverse Plant and equipment will be switched off when not in use Material drop heights will be minimized and dragging materials along the ground will be minimized | Project Manager Site Manager |

Table 5.1 Construction noise and vibration management and control measures

| Potential Impact/s | Actions to manage (remove or mitigate) impact | Responsibility |
|---|--|---|
| Community Consultation | | |
| Non-conformance with CEMP objectives, development consent SSD 9766, EIS and RTS | An emergency after hours contact phone number will be put in place to allow contact with the project manager in relation to any environmental matter. This phone number will be clearly displayed on the site fencing. Any noise related complaints will be handled promptly, and a complaints register will be kept | Project Manager Environmental Representative |

5.2 Water

5.2.1 Surface water

The stormwater management system for the site has been designed to conform with relevant guidelines listed in Consent Condition B31.

The site surface is currently 50% partially sealed, front to back on the southern side. The proposal is to seal the site and construct two shed at the rear of the property. The existing waste processing shed will be relocated to the centre of the site and incoming and outgoing weighbridges installed. There is car parking and landscaping at the front of the site. All the sheds and roof areas will drain to an onsite detention system designed to Council's Standards. The inclusion of all the material handling activities within sheds means that there is no leachate or need to manage leachate on the site. The site runoff management can be as per a normal industrial site.

As required by the development consent conditions, the fuel storage area would be bunded to store any spillages and prevent mixing with surface runoff from the open areas (refer Figure 1.2). It also has an awning over the bunded area to exclude rainwater from entering the bund.

Additional erosion and sediment control measures will be implemented to minimise the extent of sediment in runoff during construction from the site. The erosion and sediment control plan is included in Appendix B, and construction mitigation measures are included in Table 5.2 below.

5.2.2 Groundwater

There is a fall of up to 5m from the site to Girraween Creek in the golf course on the western side of Toongabbie Road. The existing industrial area has fully sealed sites with limited water percolation into the subsurface. As such, the groundwater in the area would be limited and at depths of 3m to 5m.

During the construction phase, any excavation works would be limited as the existing site is well graded to suit the proposed surface gradient and the works requiring excavation would be limited to the provision of drainage lines, drainage pits and a small water quality treatment unit. These excavations would be less than 2.5m deep and in limited areas so as to have no significant adverse impacts on groundwater levels or quality.

The site is currently 50% sealed, and the existing stormwater system will be augmented by bidum cloth barriers to prevent sediment from entering the stormwater system during construction.

5.2.3 Management and control measures

Site specific surface water and groundwater, including erosion and sediment control, mitigation and management measures will be implemented at the facility during the construction phase. These are provided in Table 5.2.

Table 5.2 Construction water management and soil control measures

| Potential impact/s | Actions to manage (remove or mitigate) impact | Responsibility |
|---|--|--------------------------------------|
| Surface water and groundwater, including sediment and erosion control | | |
| Non-conformance with CEMP objectives, development consent SSD 9766, EIS and RTS | <ul style="list-style-type: none"> Prior to the commencement of any construction the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by Condition C2. | Project manager |
| | <ul style="list-style-type: none"> Construction for the site for concrete, drainage pipes and block elements will be undertaken in accordance with the NSW Department of Environment and Climate Change's guidelines for saline soil which recommend use of separation methods or classes of concrete suitable for saline soil environment's | Environmental manager/representative |
| | <ul style="list-style-type: none"> The runoff erosion and sediment control strategy will be implemented to manage runoff and sediment during construction phase | Project manager |
| | <ul style="list-style-type: none"> Specific runoff sediment traps will be incorporated along the flow path to remove sediment and debris at the source | Environmental manager/representative |
| | <ul style="list-style-type: none"> Bund and silt fencing will be incorporated around the perimeter of the site to ensure runoff does not flow onto adjacent sites | Site manager |
| | <ul style="list-style-type: none"> The sediment and runoff control measures will be maintained on a regular basis and after storm events | All employees |
| | | |

5.3 Air quality

5.3.1 Fumes and dust

Potential sources of particular matter emissions during the construction phase of the project include:

- vehicle entrainment of particulate matter due to the haulage of construction material within the facility boundaries;
- unloading of construction material within the site; and
- diesel fuel combustion by on-site plant and equipment.

The following activities are likely to generate dust during the construction phase of the project:

- vehicle and mobile equipment movement on unsealed surfaces prior to the site being sealed;
- construction material handling;
- any other topsoil disturbance including excavation works; and
- installing weighbridges, below ground OSD and shed footings.

5.3.2 Odour

There are no foreseeable odour impacts anticipated as a result of the construction works.

5.3.3 Management and control measures

Table 5.3 Construction air quality management and control measures

| Potential impact/s | Actions to manage (remove or mitigate) impact | Responsibility |
|---|--|--------------------------------------|
| Surface water and groundwater, including sediment and erosion control | | |
| • Non-conformance with CEMP objectives, development consent SSD 9766, EIS and RTS | • Land stabilisation works are carried out progressively on site to minimise exposed surfaces | Site Manager |
| • Air and surface water pollution | • Regular visual monitoring of the dust levels inside the construction site | Environmental manager/representative |
| • Dust and odour nuisance to local residents and businesses | • Street sweeping of hardstand driveways and roads where required | Site manger All employees |
| • Public and environmental health hazard | • Trucks associated with the facility constructions works will not track dirt onto the public road network. As a result, public roads used by these trucks will be kept clean. | Truck drivers |
| | • As soon as sealed areas are created, they will be maintained. | Site manager |
| | • Truck tyres will be cleaned to prevent mud or sediment being carried to and deposited on the access roads and public roads. | Site manager Truck drivers |
| | • All trucks entering or leaving the site with construction material loads will have their loads covered. | Site manager Truck drivers |

5.4 Heritage

5.4.1 Unexpected heritage items

Condition B34 & 35(Part B) of development consent SSD 9766 specifies that the CEMP must include an unexpected finds protocol (see Unexpected Contamination and Finds Protocols - Appendix C) for heritage items. There have been instances, even when thorough cultural heritage assessments are undertaken during the environmental assessment process, where unexpected heritage items (both Aboriginal and non-Aboriginal) are not appropriately identified and are subsequently found on a construction site.

The consent requires the following:

If any aboriginal objects are identified during the construction or operation of the facility, Benedict would cease work in the immediate area of the find and fence off the area. The find would be reported to DPIE and management measures would be implemented based on the significance of the item. An unexpected finds protocol will be developed further and included in the CEMP and OEMP (see Appendix C)

5.5 Traffic and transport

5.5.1 Construction management and control measures

Condition B1 (Part B) of development consent SSD 9766 specifies the requirement for the preparation of a Construction Traffic Management Plan (see Appendix A). Relevant construction traffic and access commitments for the facility, which are, along with other management measures, included in Table 5.4.

During peak stage of construction, the proposal will potentially generate up to 10 light vehicles and 10 heavy vehicles per day, resulting in up to 40 daily traffic movements in total.

Table 5.4 Construction air quality management and control measures

| Potential impact/s | Actions to manage (remove or mitigate) impact | Responsibility |
|--|---|--|
| <ul style="list-style-type: none">Remove a total of seven street parking spaces along the eastern side of Toongabbie Road (near site boundary) will need EIS and RTS | <ul style="list-style-type: none">To be remove to all for access to the facility;No parking signs are to be provided as shown in the concept parking signage plan and/or as agreed by Council;Site traffic speed limit 10 km/hr; andAll load leaving the site to be covered. | <ul style="list-style-type: none">Site ManagerAll employees |

5.6 Contamination

Condition B42. Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination 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 (d) (Part C) of development consent SSD 9766 specifies that the CEMP should include an unexpected finds protocol for contaminated material. Given the condition of the site (50% sealed) and 100% utilised as a waste facility historically, contamination is therefore possible. Should contaminated items be found, the steps outlined in Appendix?? Unexpected Contamination and Finds protocols. This Protocol will identify intrusive ground construction activities and detail how these activities will be managed to avoid or mitigate negative environmental impacts.

5.7 FIRE SAFETY

Fire Safety System

B40. Prior to the commencement of construction, the final fire and life safety design of the development, including firewater containment, must be finalised in consultation with FRNSW to the satisfaction of the Planning Secretary and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of Volume One of the National Construction Code (NCC) Series.

B41. Fire and life safety measures are required to be reassessed in consultation with FRNSW if the development consent is modified to change the site configuration, approved processing capacity or accepted waste streams.

5.8 Public safety

Construction works will predominantly be on privately owned land which is not readily accessible to the public. Construction works will be temporary.

5.8.1 Management and control measures

The following management measures in Table 5.5 will be implemented.

Table 5.5 Public safety management and control measures

| Potential impact/s | Actions to manage (remove or mitigate) impact | Responsibility |
|---|--|---------------------------------|
| <ul style="list-style-type: none">Public safety/hazards | <ul style="list-style-type: none">Safety signage will be placed around the construction site.Fencing will be constructed or maintained before and during any of the construction activities taking place. | Site Manager Project Manager |

6 Environmental management systems

6.1 Safe Work Method Statements (or equivalent)

Safe Work Method Statements (SWMS) is a key construction site document that outlines the work activities to be undertaken at a workplace, the safety hazards and environmental risks that may arise from these activities, and the controls to put in place to manage and mitigate the hazards and risks.

In most instances, the SWMS will be prepared by the work crew carrying out work activities associated with the construction of the project. The SWMS will then be signed off by the site supervisor.

Where the work crew is not involved in developing the SWMS, they must have an opportunity to read, understand and sign the SWMS prior to commencing the work.

Every activity that is undertaken as part of the construction works must be carried out in accordance with a developed SWMS.

6.2 Monitoring and measurement

A requirement of condition C1 (c) (Part C) of development consent SSD 9766 is to detail how the environmental performances of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.

Environmental monitoring will involve observing, collecting, and interpreting data to evaluate the effectiveness of the specified environmental management measures, and to facilitate CEMP review and improvement where necessary.

Monitoring will be carried out as frequently as required for each of the environmental aspects covered in Chapter 5.

6.3 Audits and inspections

6.3.1 Audits

The implementation of the CEMP will be audited by the environmental representative in conjunction with the project manager to ensure effective compliance with safety hazards, environmental controls, reporting and incident management.

The Council may wish to conduct an audit within one month of commencement of construction activities on site. If the Council were to carry out a site audit, this would be planned and recorded in a summary report.

Audit reports raised will be provided to the project manager for determining corrective action and reply.

6.3.2 Regular inspections

The environmental representative will undertake inspections of the work sites weekly and after rainfall events, to ensure that environmental controls outlined in this CEMP are implemented and to evaluate their effectiveness. Their observations will be recorded, and any work requiring rectification will be communicated to the site manager.

Rectification work will be arranged by the site manager and completed with accountability and within the given timeframe. Any rectification work that cannot be completed within the specified timeframe shall be recorded as a corrective action.

Issues arising from site environment inspections shall be discussed at regular toolbox meetings and any concerns raised will be considered by the environmental representative and project manager.

6.3.3 Pre work inspections

An inspection will be carried out by the work crew prior to the commencement of works on each shift, which will include a check of relevant environmental controls and resources required to ensure effective operation and maintenance. Works will not commence unless inspections are found to be satisfactory.

6.4 Non-conformance and corrective actions

Benedict Industries will identify environmental non-conformances, including environmental incidents, during the construction phase of the project and will undertake the required corrective actions to address the non-conformance and implement preventative actions where required.

Environmental non-conformance will be identified through processes outlined in this CEMP such as monitoring, audits, regular inspections, and complaints. Reporting on environmental non-conformance will be the responsibility of all Benedict Industries employees and contractors. Tracking of environmental non-conformances and associated corrective actions will be the responsibility of the environmental representative.

6.4.1 Environmental Incident and Action Register

When an environmental non-conformance or environmental incident is identified, the details of these will be documented in an Environmental Incident and Action Register, with the following steps to be taken:

- the register will outline the nature of the non-conformance/incident, the corrective and preventative actions proposed and to be undertaken, the responsibilities and schedule for completion of these actions;
- non-conformances associated with monitoring, audits, inspections and complaints will be linked to the records of these;
- once an action has been completed, the status of the incident will be updated to close the action, with comments and completion date; and
- the Environmental Incident and Action Register will be reviewed weekly by the environmental representative.

Benedict Industries will maintain a register of accidents, incidents, and potential incidents for the duration of the development. This register is to be made available for inspection at any time by DPE, EPA or the Independent Hazard Auditor.

Further detail about the management of incidents and incident response planning is covered in Section 7.

7 Environmental incidents and emergencies

7.1 Public complaints

Any enquiries or complaints made by members of the public to site personnel should be directed to the project manager.

Benedict Industries employees or contractors present on site during the construction of the project should not speculate or engage with the public regarding their complaints or enquiries.

To effectively manage any requests for information or respond to any public concerns in relation to the proposed construction activities and site operation, an emergency after hours contact phone number will be put in place to allow contact with the project manager in relation to any environmental matter. This phone number will be clearly displayed on the site fencing.

All information relating to such complaints will be kept in a register. The register will include but not be restricted to the following information:

- date and time of complaint;
- complainant details (ie full name, address and contact details where these have been voluntarily provided);
- nature and source of complaint;
- action taken; and
- follow-up with complainant.

The complaint register will be made available to any relevant regulatory authority upon request.

Should the complaint be relevant to any of the conditions of development consent SSD 9766 conditions, it shall be handled as per the conditions relevant to that environmental aspect.

7.2 Incident response

All environmental incidents, including complaints, near misses and non-compliances with the CEMP must be reported internally so that they can be investigated, corrected, and prevented from recurring. These will be recorded into an Environmental Incident and Action Register, as per specifications outlined in Section 6.4.1.

Persons that have been involved or have witnessed an incident will report it immediately to the site manager or environmental representative. Once the incident has been reported internally via the correct channels, all efforts will be undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place.

Incident investigations will be closed as quickly as possible, taking all required action to resolve each environmental incident and re-occurrence.

Within 24 hours of an incident or potential incident with actual or potential significant offsite impacts on people or the biophysical environment, a report must be supplied to DPE outlining the basic facts of the incident. A further detailed report must be prepared and submitted following investigations of the causes and identification of the necessary additional preventative measures no later than 14 days after the incident or potential incident.

EPA will also be notified of an actual or potential incident with significant offsite impacts immediately following the incident or potential incident.

7.3 Emergency Management

The POEO Act requires the occupier of premises, the employer or any person carrying out an activity which has caused a pollution incident to immediately notify each relevant authority when material harm to the environment is caused or threatened.

Persons responsible for reporting a pollution incident should follow this information and procedures:

- the person should call 000 if the incident presents an immediate threat to human health or property. Dialling 000 serves to contact Fire and Rescue NSW, the NSW Police and the NSW Ambulance Services;
- if the incident does not require any of the above-listed services, the 24-hour hotline for each of the following services can be called, as listed in Table 7.1.

Emergency contact details are listed in a table below.

Table 7.1 **Emergency contacts**

| Emergency organisation | Contact details |
|---|-----------------|
| Police | 000 |
| Ambulance | 000 |
| Fire and Rescue NSW | 000 |
| Fire and Rescue Wentworthville | 02 9631 0908 |
| EPA's Environment Line | 131 555 |
| WorkSafe NSW | 131 050 |
| Sydney Water | 13 20 90 |
| Relevant Energy provider | TBC |
| Wildlife Information Rescue Education Service (WIRES) | 1300 094 737 |
| Environmental representative | TBC |
| Project manager | TBC |

References

Environment Protection Authority 2014 Waste Classification Guidelines – Part 1: Classification of Waste

Environment Protection and Heritage Council and Natural Resource Management Ministerial Council (EPHC and NRMMC) 2011 National Guidance for the Management of Acid Sulfate Soils in Inland Aquatic Ecosystems

NSW Safework 2016 How to Manage and Control Asbestos in the Workplace

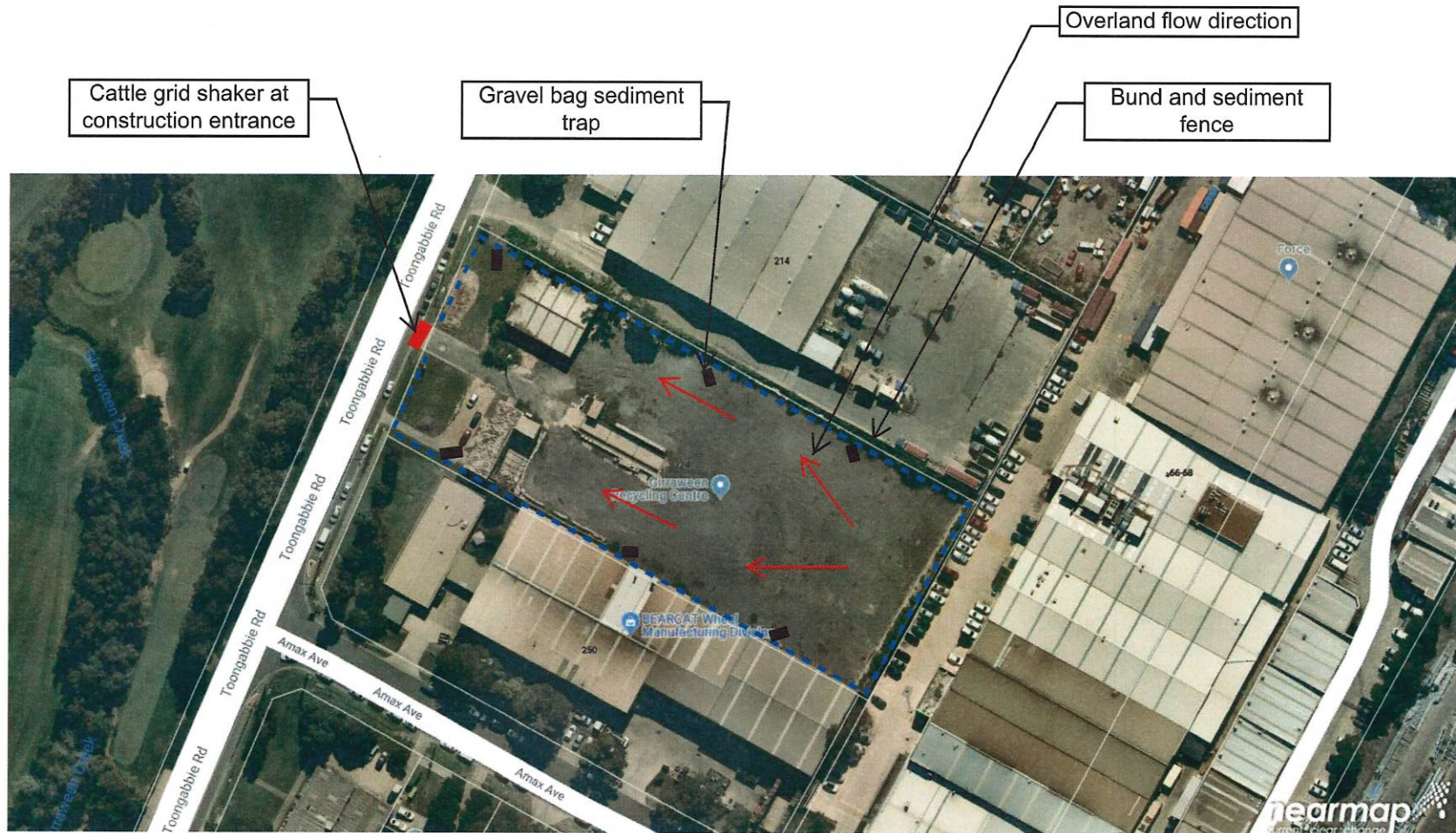
Appendix A

Construction traffic management plan

Appendix B

Erosion and sediment control plan

FIGURE 3



Notes

1. inspect sediment control measures weekly and repair as necessary.
2. remove accumulated sediment along sediment fence and at gravel bag traps on weekly basis and after storms.
3. Remove accumulated sediment from the shaker grid on weekly basis.
4. Sweep construction access as necessary to remove any sediment.

**EROSION AND
SEDIMENT
CONTROL PLAN**

Appendix C

Unexpected contamination and finds protocols

UNEXPECTED CONTAMINATION AND FINDS PROTOCOLS



GIRRAWEEEN RECYCLING AND WASTE TRANSFER FACILITY

MARCH 2021

Disclaimer: Whilst Benedict will make every effort in good faith to communicate the contents of this document to heavy vehicle drivers frequenting the Girraween Recycling Facility (GRF), it cannot guarantee enforcement of nor compliance with any specific elements of the document for heavy vehicles which are beyond the GRF site boundary.

| Document Control | | | | |
|------------------|------------|------------------|--------|----------|
| Rev No | Date | Revision Details | Author | Reviewer |
| 01 | 16/02/2021 | Draft | EM | ED |
| 02 | 04/03/2021 | Rev1 | EM | IS |

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1. INTRODUCTION

1.1 Background

Benedict Recycling Pty Ltd (Benedict) is the operator of the Girraween Waste Recycling and Transfer Facility (GRF) located at 224-232 Toongabbie Road, Girraween.

The GRF is to receive up to 220,000 tonnes per annum of General Solid Waste (non-putrescible) and was approved on the site by the NSW Department of Planning and Environment under application number SSD 9766 on 17 June 2020.

Condition C3(c) requires the unexpected finds protocol to be applied as per Conditions B34 & B35 of the development consent for aboriginal heritage items.

Condition B42 requires protocols for the identification and disposal of any discovered contaminated material during earthworks.

Location

The facility is located at 224-232 Toongabbie, Girraween NSW and is within the local government area of Cumberland Council. The site occupies Lot 678 DP 9157, with a total land area of 9000m².

Figure 1.1 shows the location of the site and the surrounding road networks. The site is bounded by industrial and commercial development on three sides and has been a waste facility for some 16 years.

Figure 1.1 – Site Location Map



1.2 Consent Requirements

Condition C3(c) requires the unexpected finds protocols to be included in the CEMP. This requires attention to the following:

Unexpected Finds Protocol

B34. 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) the EES must be contacted immediately.

B35. 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.

Contamination

B42. Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination 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.

1.3 Implementation

Due to the nature of site investigations, and the degree of variability in site conditions, no assessment program can eliminate all uncertainty regarding the condition of the site. There is always the potential for actual conditions encountered to differ from those inferred to exist.

This protocol is a precautionary measure (to be implemented during all future site preparation and construction works at the site) to ensure that unexpected finds of aboriginal heritage and contamination, if any, are appropriately managed and ensures the site is suitable for the proposed use.

The plan is necessary to describe the actions to be implemented by contractors if unexpected finds occur during site preparation, excavation and construction activities.

1.4.1 Responsibilities

The site manager is responsible to provide advice and a copy of the plan to all construction personnel prior to commencing work as required under the Work Health & Safety Act 2011 and Regulation 2017. All site works must be indicted to the Plan prior to the commencement of any works.

The Plan is to be implement where the ground surface is intended to be disturbed. The Plan provides a procedure to be followed in the event of an unexpected find.

1.4.2 Timing

The plan applies for the period of construction and earthworks and does not include procedures for on-going management.

2. IDENTIFICATION OF UNEXPECTED CONTAMINATION

| Unexpected Find | Details |
|--|--|
| Buried or surface asbestos containing materials and/or buried asbestos pipes | This may include cement-bound asbestos (e.g. fibro cement in the form of small fragments, flat sheets, corrugated roofing, or pipe) or other bonded forms of asbestos (e.g. bitumen, textured coatings and floor tiles may also contain asbestos). Friable forms of asbestos including lagging and insulation may be seen as fibrous material which flakes and powders easily. It is often very difficult to identify the presence of asbestos by sight. The only way to be certain is to have a sample of the material analysed by a NATA accredited laboratory. |
| Buried waste materials | This may include a variety of waste materials, inclusive of wood, plastic, metal fragments, building rubble (e.g. concrete, brick, asphalt, asbestos containing materials) and other general household/farm waste (e.g. tins and containers of farm chemicals and fuels). If waste materials are observed throughout the soil, this could indicate uncontrolled and poor-quality fill material. We do not consider that a trivial piece or fragment of foreign material is constituted as an unexpected find (e.g. a single brick). More so, a definitive grouping of these materials buried underground will constitute an unexpected find. |
| Hydrocarbon impacts | May be identified by a hydrocarbon odour which may vary in strength from slight (just detectable) to very strong (easily detectable at a distance from the source). The odour may or may not be accompanied by specific areas of dark staining (e.g. black, grey or green staining), evidence of oily sheen (e.g. soil produces a coloured effect on water surface) or larger scale discolouration of strata from a previously identified 'natural colouration'. |
| Septic tanks (biological waste) near farm houses | May be identified by a decaying odour (landfill/sewer/putrefied) which may vary in strength from possible (just detectable) to very strong (easily detectable at a distance from the source). Associated staining may be identifiable; colour and extent may vary dependant on the magnitude of spillage encountered. |
| Animal burial pits (biological waste) | Identified by reworked local soils overlying waste materials that include hair, coats, bones and decayed matter. Often perched water may collect in the base of the pit and emit a decaying odour upon disturbance. |
| Underground Storage Tanks (USTs) | These may be identified by encountering a buried cylindrical steel underground tank, deeper sand fill or relatively small concrete footings |
| | or steel pipelines, sometimes with observed hydrocarbon odours or staining. |
| Other unexpected finds | Other indications of contamination include various chemical odours (solvent, acetone, alcohol odour, sulphur (rotten egg), acidic (acetic/formic/citric), ammonia, or caustic) or staining and discolouration of soils. It is not practical to cover all types of possible unexpected finds based on their very nature. It is possible that indications of contamination not specifically covered by the plan may be encountered. In such cases it is assumed that "if in doubt" about a potential find, the precautionary principal will be employed and the unexpected finds procedure (refer to Section 4.2) will be activated. |

(Source: Bringelly Business Park Hub – Leppington: Unexpected Finds Management Plan 2019)

3. UNEXPECTED CONTAMINATION FIND PROTOCOL

The EIS included a preliminary contamination assessment identified potentially contaminating activities associated with the historic use of the site as a recycling facility and surrounding land uses comprising industrial activity. As contamination has not been confirmed the following is recommended:

3.1 Training and Induction of Personnel

All construction personnel working on the site are to be inducted on the identification of unexpected contamination finds (refer Section 1.4). The induction can be undertaken at the time of the general site induction and toolbox meetings. The induction must be performed by a suitably qualified person nominated by Benedict Recycling.

The personnel on site are required to have the general competencies to identify unexpected contamination and this will be used in good faith in the field during works and construction. It is not possible to provide an awareness to cover all types of possible discoveries. 'If in doubt' on a discovery that may be outside the induction the precautionary principle will be applied and the procedures be activated.

3.2 Protocol in the event of an unexpected contaminated find

During works:

The following procedures will be implemented if suspected contamination is discovered during excavation:

1. Upon discovery of suspected contamination, all construction works in the immediate vicinity are to cease, the site manager is to be notified and the area barricaded.
2. Relevant and necessary approvals will be obtained prior to the removal of any material or remediation works.
3. The potentially contaminated material is to be removed and disposed of in accordance with the Waste Classification Guidelines. This may include removal of a buffer zone around the potentially contaminated material, based on field observations or volatile detections with a photoionization detector. The notification and engagement of a qualified environmental consultant will be required to assess the nature and degree of potential contamination and classification.
4. Unless otherwise demonstrated, suspected potentially contaminated material will be treated as contaminated material and will be removed off-site to a waste facility licensed to accept contaminated material.
5. If the find is suspected to be asbestos material, the area is to be kept wet and management practices implemented in accordance with the Safework NSW Code of Practice, How to Manage and Control Asbestos in the Workplace, Code of Practice (Safework NSW 2016). If appropriate, the material will be covered to prevent dust generation, pending final management.
6. If the find is actually ASS or potential ASS, a suitably qualified consultant is to be engaged to manage the ASS in accordance with the National Guidance for the Management of Acid Sulfate Soils in Inland Aquatic Ecosystems (EPHC and NRMCC 2011).
7. Unexpected finds are to be documented throughout the unexpected finds process. This will include date(s), location(s), persons involved and remedial actions.
8. Once the area is remediated and validated construction works will recommence.
9. Any required remediation will be directed by the Site Manager with supervision from a qualified Environmental Consultant depending on the type and extent of contamination.

4. UNEXPECTED FINDS PROTOCOL

4.1 Training and Induction of Personnel

All construction personnel working on the site are to be inducted on the identification of unexpected. The induction can be undertaken at the time of the general site induction and toolbox meetings. The induction must be performed by a suitably qualified person nominated by Benedict Recycling.

The personnel on site are required to have the general competencies to identify unexpected aboriginal finds and this will be used in good faith in the field during works and construction.

It is not possible to provide an awareness to cover all types of possible discoveries. 'If in doubt' on a discovery that may be outside the induction the precautionary principle will be applied and the procedures be activated.

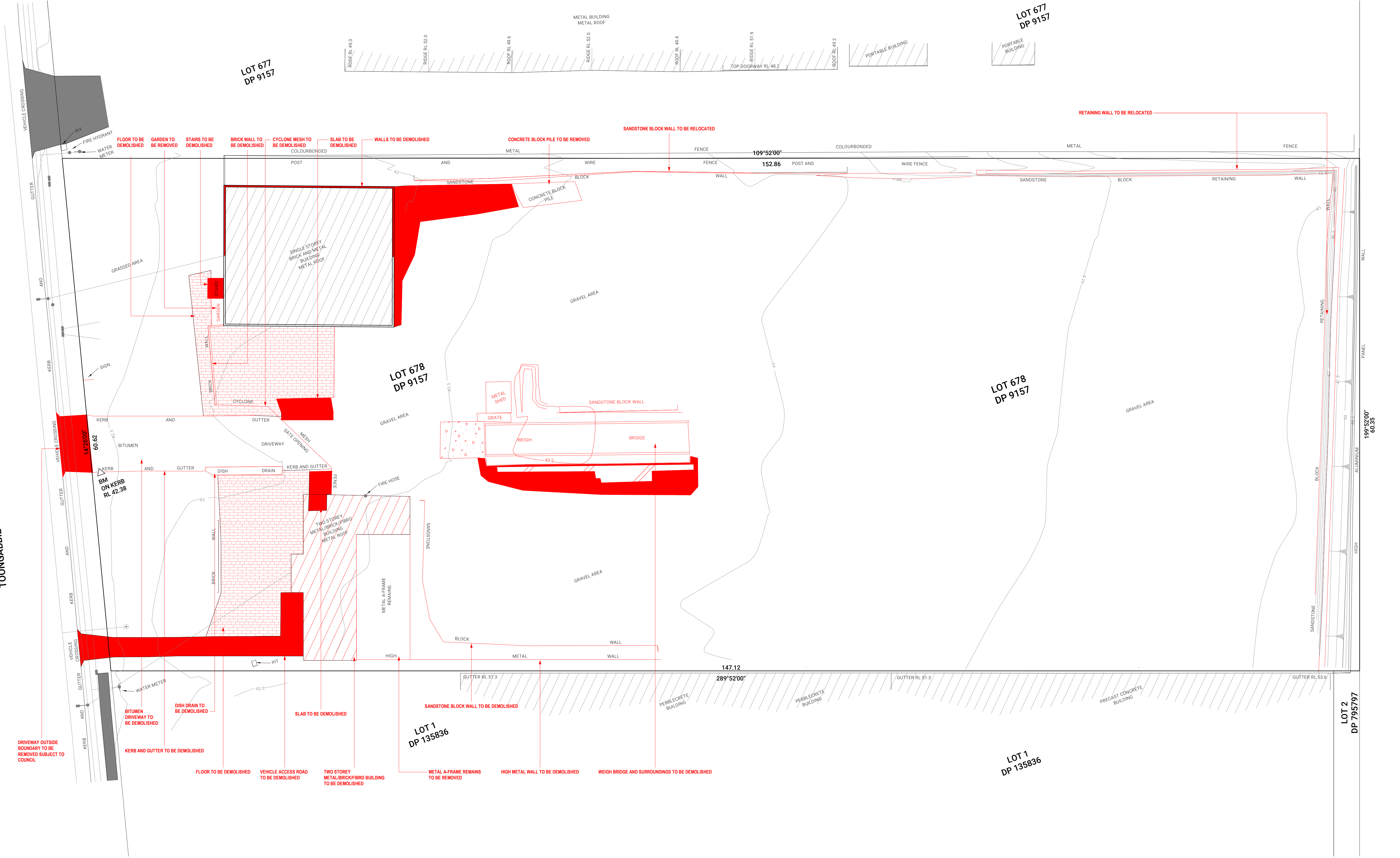
4.2 Protocol in the event of an unexpected finds

1. All work in the immediate vicinity will cease and a 10m buffer be cordoned off. The find will be immediately reported to the work supervisor who will immediately advise the Environment Manager or other nominated senior staff member;
2. The Environment Manager or other nominated senior staff member will immediately notify the police and the state coroner (as required for all human remains discoveries);
3. The Environment Manager or other nominated senior staff member will contact OEH for advice on identification of the skeletal material;
4. If it is determined that the skeletal material is Aboriginal ancestral remains, the Local Aboriginal Land Council will be contacted, and consultative arrangements will be made to discuss ongoing care of the remains; and
5. If it is determined that the skeletal material is not Aboriginal ancestral remains, further investigation will be conducted to determine if the remains represent a historical grave or if further involvement of the police is required.

If unexpected historical archaeology is discovered during construction, work in the immediate area must cease and an archaeologist must be contacted to make an assessment of the find. If it is determined to be a relic under the Heritage Act, further investigation may be required.

Appendix D

Facility plans and drawings



PRELIMINARY

| | | | |
|-----------|----|----------|-----------------|
| Revisions | P1 | 19.03.19 | FOR INFORMATION |
| | P2 | 12.04.19 | FOR INFORMATION |
| | P3 | 25.07.19 | FOR INFORMATION |
| | P4 | 30.07.19 | FOR INFORMATION |

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Project /
**Toongabbie Road,
Girraween**
224-232 Toongabbie Road, Girraween, NSW,
2145

Drawing /
Demolition Plan

Project No /
219034 Date /
19.03.19

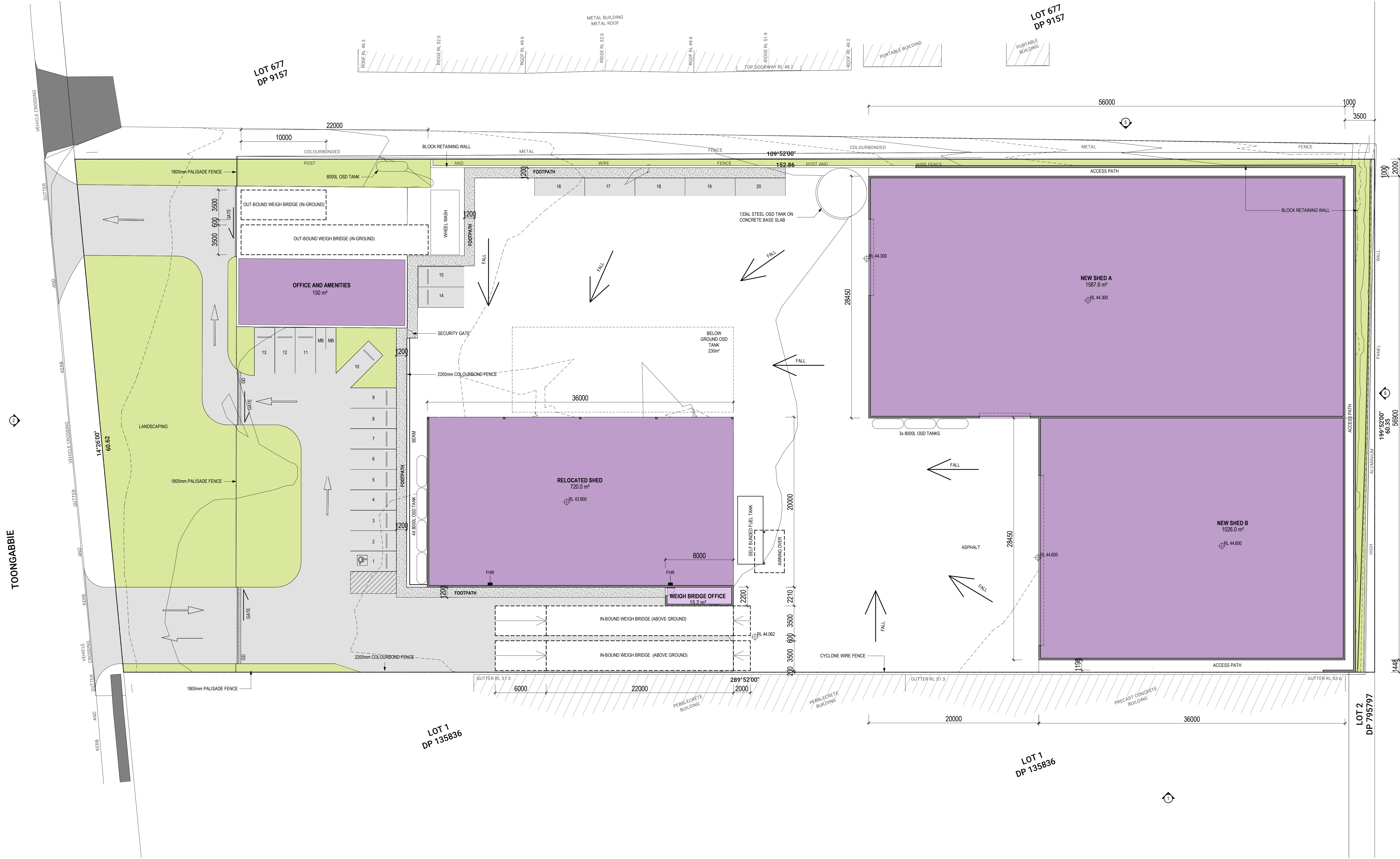
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TOONGABBIE

PRELIMINARY

| | | | |
|-----------|----|----------|-----------------|
| Revisions | P1 | 25.02.20 | FOR INFORMATION |
| | P2 | 23.03.20 | For Information |

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Project / **Toongabbie Road,
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224-232 Toongabbie Road, Girraween, NSW,
2145

Drawing / **OSD Plan**

Project No / **219034**

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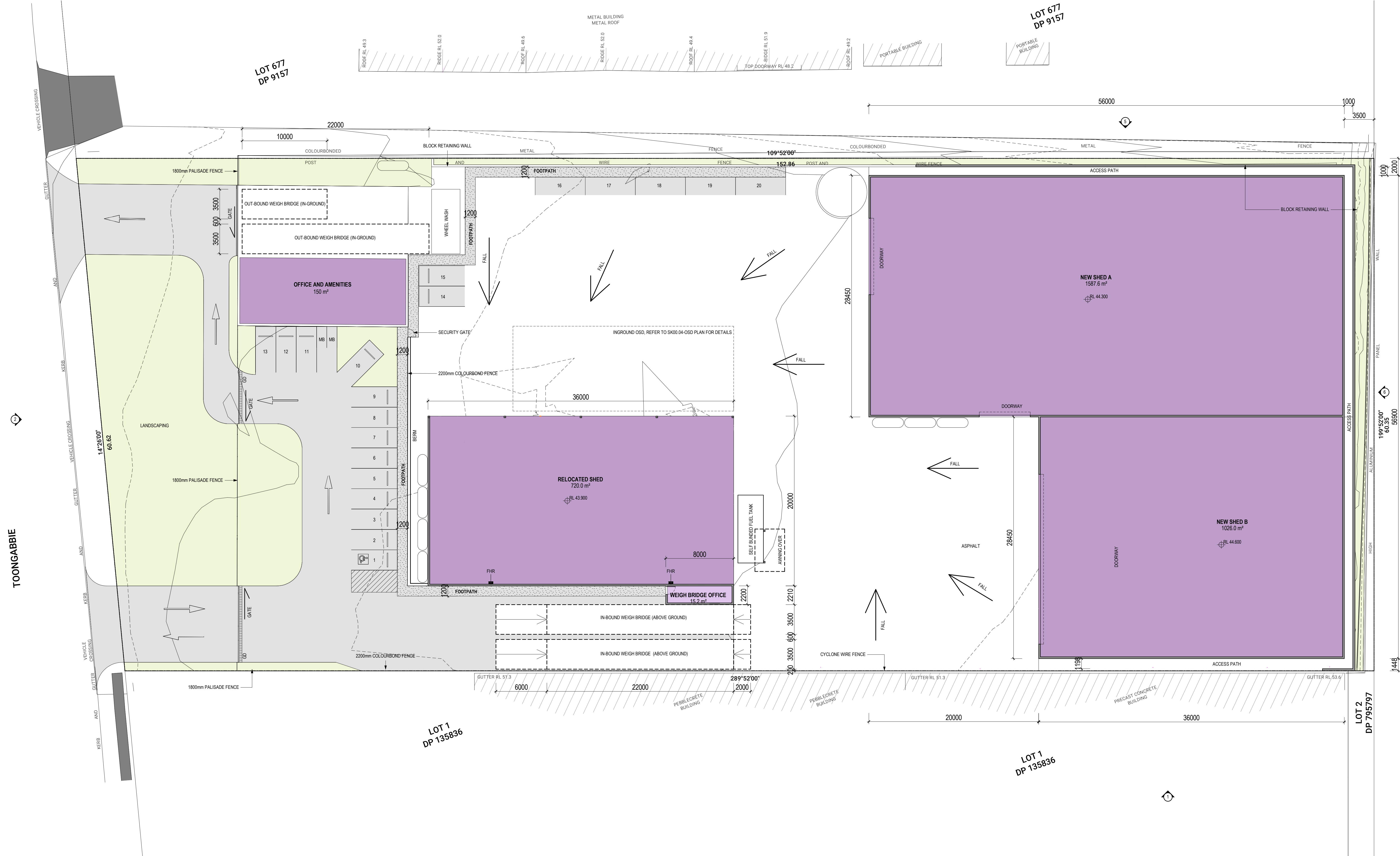
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| | P5 | 29.07.19 | FOR INFORMATION |
| | P6 | 30.07.19 | FOR INFORMATION |
| | P7 | 23.03.20 | For Information |
| | | 20 | |

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2145

Drawing / **Ground Plan**

Project No / **219034** Date / **18.03.19**

Author / **JG**

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Drawing No. / **SK01.01 P7**

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Revisions
P3 12.04.19 FOR INFORMATION
P4 25.07.19 FOR INFORMATION
P5 30.07.19 FOR INFORMATION
P6 23.03.20 For Information
20

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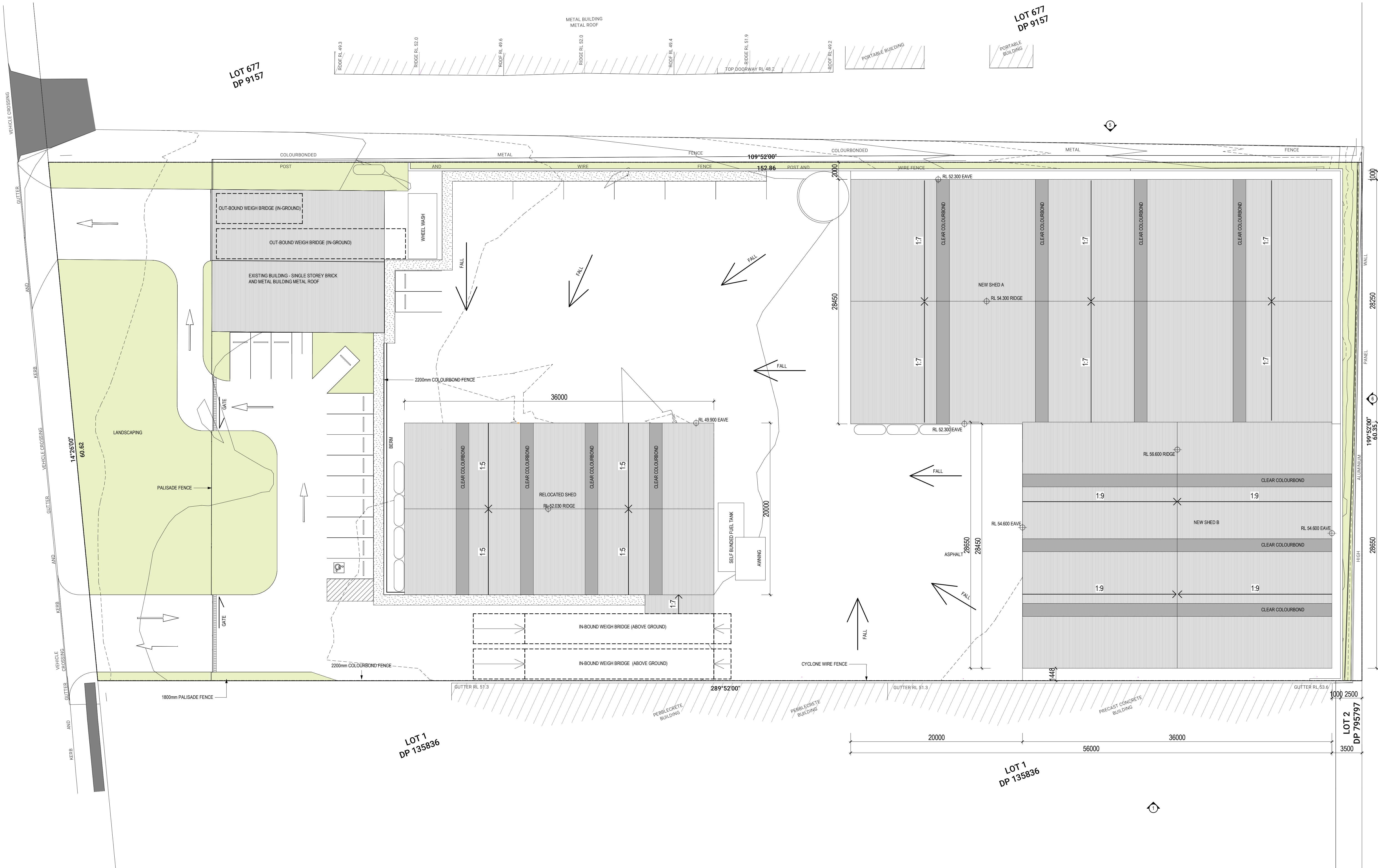
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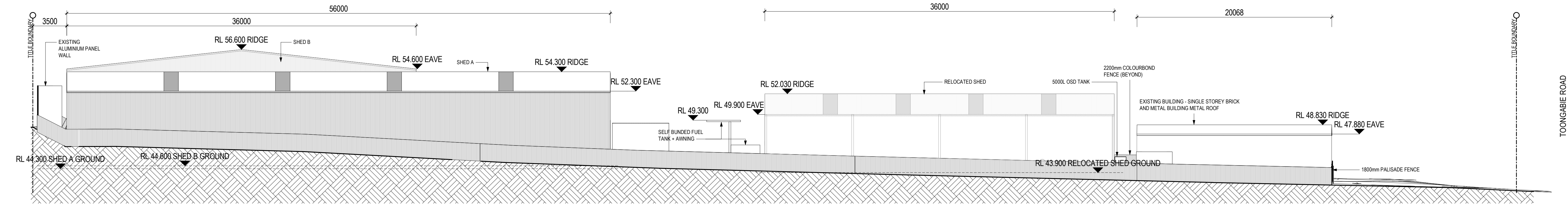
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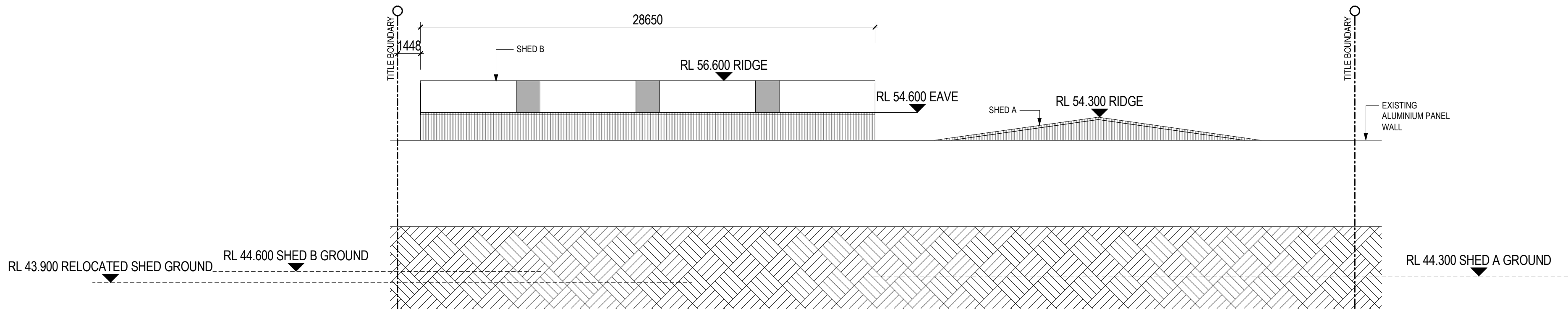
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5 SITE ELEVATION - NORTHERN
SCALE 1 : 200



6 SITE ELEVATION - EASTERN
SCALE 1 : 200

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| Revisions | P1 | 12.04.19 | FOR INFORMATION |
| | P2 | 25.07.19 | FOR INFORMATION |
| | P3 | 30.07.19 | FOR INFORMATION |

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Drawing **Site Elevations**

Project No **219034** Date **12.04.19**

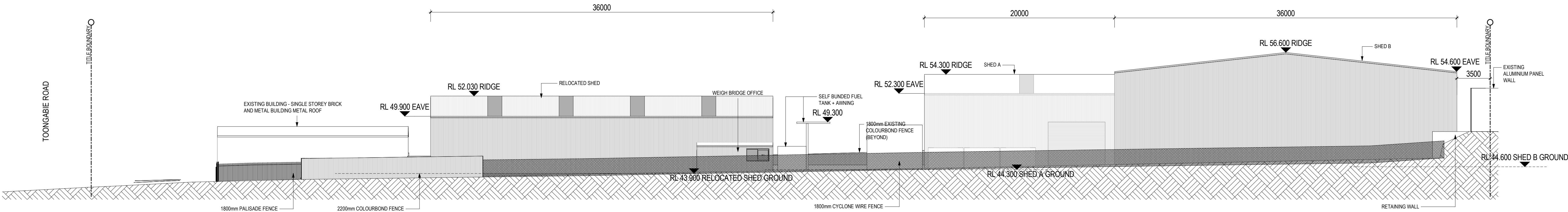
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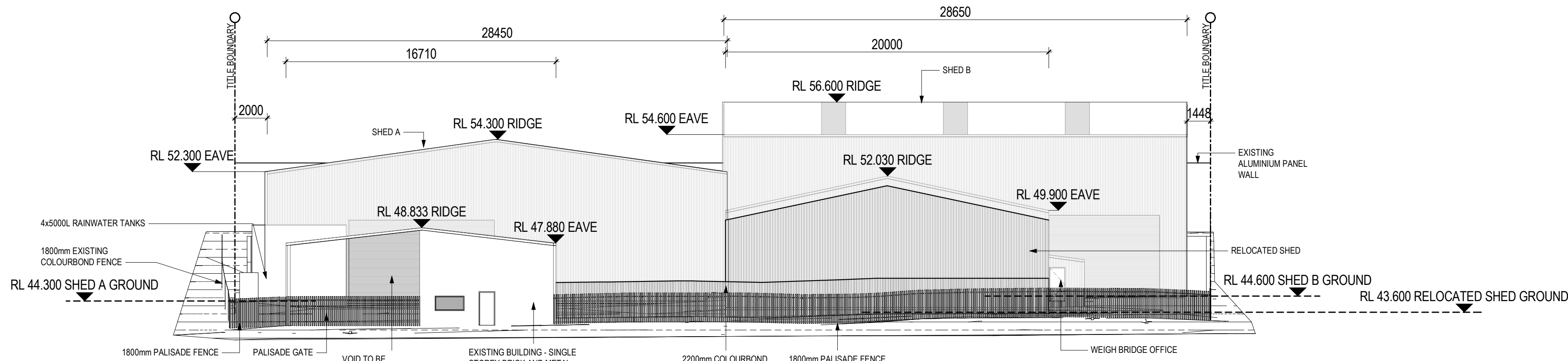
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1
SK00.04
SITE ELEVATION - SOUTHERN
SCALE 1 : 200



2
SK00.04
SITE ELEVATION - WESTERN
SCALE 1 : 200

PRELIMINARY

Revisions
P1 25.07.19 FOR INFORMATION
P2 30.07.19 FOR INFORMATION

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Project
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Girraween

224-232 Toongabbie Road, Girraween, NSW,
2145

Drawing
Site Elevations

Project No
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Date
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