Construction Environmental Management Plan

M20533

Ozzbuild

PROPOSED DEVELOPMENT AT:

William Clarke College

1 Morris Grove,

Kellyville NSW 2155

Wednesday, 26th November 2025

NEO CONSULTING

Report Distribution

Construction Environmental Management Plan

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Nick Caltabiano

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1. Introduction

1.1 Purpose and Scope of the CEMP

The purpose of this Construction Environmental Management Plan (CEMP) is to describe the processes to be undertaken during works for the property located at William Clarke College, No. 1 Morris Grove, Kellyville NSW 2155 (the site) to ensure the support and protection of human health and the surrounding ecosystem. The CEMP is to be submitted to the principal certifying authority for approval. The CEMP describes how the principal contractor will manage the potential environmental impacts of the proposed development in accordance with applicable legislative requirements. The environmental management measures outlined in the CEMP will remain in place and be maintained for the duration of construction works.

1.2 Proposed Development

The proposed development for the site includes the replacement of the carpark area.

2. Project Contact Information

2.1 Internal Communication

The principal contractor is committed to ensuring effective communication and consultation are undertaken on a regular basis at all levels of the business. The methods of communication on site will include:

- Pre-start meetings;
- Inductions;
- Alerts/bulletins/initiatives; and
- Environmental work method statements.

2.2 External Communication

Table 1. Relevant site stakeholders

Agency	Phone and Email
OzzBuild	P: E:
NEO Consulting (Environmental Consultant) Nick Caltabiano (Project Manager)	M: 0416 680 375 E: nick@neoconsulting.com.au
(Traffic Consultant)	P: E:
(Acoustic Consultant)	P: E:

2.3 Emergency Contacts

Table 2. Emergency Contact Details

Agency	Phone
NSW EPA	Environment Line 131 555
NSW Police	000
NSW Fire and Rescue	000
NSW Ambulance	000
Environmental Consultant (NEO Consulting)	0416 680 375
Site Manager (24 hour)	TBC

3. Construction Environmental Management Plan

3.1 General

The site manager for the site should have a thorough understanding of the content of this CEMP, Work Health and Safety and should ensure all workers and subcontractors involved in procedural works understand the contents of these documents. The site manager is responsible for securing the site and warning signs to prevent unauthorised access. All workers must sign in daily, and visitors must sign a visitor logbook outlining the purpose of the visit, representing the company and time-on/ time-off site. Site operative hours for work will be between 7:00 am and 6:00 pm Monday to Friday and 8:00 am and 1:00 pm on Saturdays. No site works are to be undertaken on Sundays and Public Holidays.

3.2 Environmental Training

A site induction should be prepared by the site manager to detail the requirements and responsibilities of staff and sub-contractors for managing environmental risks during the early works program. The site induction should be administered to all site workers prior to their commencement of the project. Provision of training, equipment manuals, health and safety procedures, risk assessments, and PPE to control hazards associated with waste management activities are the responsibilities of the site manager. All employees are required to undergo general environmental awareness training including:

- Undergo a thorough site induction;
- Undergo environmental emergency response training;
- Knowledge regarding the prevention of pollution and environmental damage;
- Competency for handling and storing construction materials;
- Understanding of the best practice for waste management;
- Knowledge of legislative requirements and consequences for non-compliance; and
- Read the contents of this CEMP and understand processes that may be required or whom to contact in the case of an environmental emergency.

3.3 Record Keeping

The effectiveness of management plans and control measures should be assessed through reports that may include details of the following:

- Daily inspections of waste storage areas;
- Weekly inspections of implemented control measures and contingency measures;
- Inspections following site incidents and/ or weather events (e.g., heavy rain) as required;
- Records of heavy vehicle movements including;
- Vehicle registration, driver and company details;
- Material being transported and incoming or outgoing status;
- Date and time in and out of the site; and
- Location of destination for waste disposal or origin if material is being transported to site.

3.4 Community Consultation and Complaints Management

The CEMP requires community consultation and communication to ensure the surrounding neighbourhood and environment are aware of on-site work processes and potential noise and vibration disruptions. In the case that any works could pose any impact on the surrounding area, the following information will be provided to the local community including, but not limited to:

- On-site activities that may create noise, vibration or other disturbance; and
- Work approved to be undertaken outside standard construction hours in particular noisy works before such works are undertaken.

A 24-hour community liaison phone number and permanent site contract will be provided, so complaints can be received and addressed. Should complaints arise they are to be dealt with in a responsible and

uniform manner. Local residents and landowners should be informed by mail and on-site signage of a direct phone number where any complaints regarding on-site work can be recorded. All complaints are to be investigated by the site manager and/or principal contractor. The information required from the complaint should include, but is not limited to:

- Location of the complainant;
- Time/s of occurrence of incident/s;
- Nature of impact on the individual, community and/or environment;
- Suspected source; and
- Weather conditions or other environmental factors that may influence the outcome of the incident/s.

Updates on work progress, construction activities and planned work solutions will be provided where significant changes in noise and vibration are expected. The following processes are to be employed following the receival of a noise and/or vibration complaint.

In the event of a valid noise complaint, the suitable personnel will undertake compliance noise monitoring and report to the client as soon as possible. A testing method will be included, that complies with AS 2659.1:1998 and encompass:

- Sound level meter configures for "fast" time weighting and "A" frequency weighting;
- The test environment will be free from reflecting objects where possible. Where the noise monitoring is conducted with walls or a built façade, then a reflection correction of up to -2.5dBA will be applied to remove the effect of increasing sound reflection from such structures;
- Tests will not be carried out during the rain or when the wind speed at the site exceeds 5m/s; and
- Conditions such as wind velocity, wind direction, temperature, relative humidity and cloud cover will be recorded.

In the event of a valid vibration complaint, the suitable personnel will undertake compliance vibration monitoring and report to the client as soon as possible. A testing method will be conducted including:

- Transducer to be affixed to ground or building in accordance with AS 277 5 – 2004;
- Monitoring is to be conducted for at least three distances from the plant, including a representative distance for the nearest sensitive structures and/or receivers; and
- The testing will be conducted at each location to obtain a suitable representation of the range of vibration levels that would occur from the tested plant.

3.5 Site Security

Site fencing will be erected around the site entrance to prevent unauthorised site access and secure the site. The four (4) principles of Crime Prevention through Environmental Design should be considered further to ensure appropriate and ongoing security during demolition works as follows:

1) **Surveillance**: Demolition of all existing vacant structures and clearing of the site will remove any physical barriers that provide opportunities for concealment and unauthorised habitation and allow for passive surveillance of the site from surrounding buildings and spaces;
2) **Access/egress**: Construction fences erected as part of the works allow for the implementation of safe control of access and egress to the site;
3) **Territorial reinforcement**: The demolition and clearing of the site, along with the installation of construction fencing, allows for territorial reinforcement and deters potential criminal activity; and
4) **Space management**: Crime prevention is achieved by allowing for adjoining buildings and spaces, to have adequate passive surveillance over the vacant and cleared site.

All external lighting across the proposed development area will be in compliance with AS 4282-2019 Control of the obtrusive effect of outdoor lighting.

3.6 Timing and Sequencing Information

Refer to the construction program for timing and staging information.

4. Construction Noise and Vibration Control Plan

A suitably qualified consultant is to be engaged to assess noise and vibration for the proposed development, if required.

4.1 Management

Noise will be restricted to a reasonable level. All on-site equipment must ensure noise and vibration levels do not exceed statutory levels. A safe working buffer distance that complies with human comfort, standard dwelling and guidelines is recommended to minimise the impacts of vibration and noise, and therefore minimise impact on the surrounding community.

4.2 Potential Construction Noise and Vibration Sources

The construction activities have been broken down into key stages including:

- Site establishment;
- Construction; and
- Site decommissioning.

4.3 Noise Monitoring

Noise monitoring, if required, is to be undertaken by an acoustic consultant, directly engaged by the contractor. The monitoring should include the following:

- Differentiate the construction noise sources from background and/or other extraneous noise;
- Identify and document excessive noise emitted from construction machinery or operation; and
- Undertake additional readings in the event of a noise complaint.

4.4 Noise Minimisation

Construction of the site building and associated infrastructures is anticipated to have the potential to create noise and vibration disruption to the surrounding area. Noise and vibration will be restricted to a reasonable level. All machinery on-site must ensure noise levels do not exceed statutory levels. Noise impacts from construction activities for the proposed development will be reduced by implementing measures to control noise at the source including:

- Selecting equipment to minimise noise emissions, where practicable possible;
- Ensuring construction equipment is appropriately serviced and maintained;
- Ensuring construction equipment is fitted with properly maintained noise suppression devices in accordance with the manufacturer's specifications;
- Removal of equipment found to produce excessive noise compared with typical industry expectations or standing down equipment until repairs or modifications can be made; and
- Training site personnel to operate construction equipment appropriately and efficiently.

4.5 Designated Respite Periods

4.5.1 Working Hours

Site operative hours for work will be between 7:00 am and 6:00 pm, Mondays to Fridays and 8:00 am and 1:00 pm on Saturdays. No site works are to be undertaken on Sundays and Public Holidays.

4.5.2 Recommended Respite Periods

Table 3. Recommended Respite Periods

Monday to Friday	Saturday
7:00am-8:00am – No noisy works (respite)	8:00am-9:00am – No noisy works (respite)
8:00am-12:00am - Works	9:00am-12:00am - Works
12:00pm-1:00pm – No noisy works (respite)	12:00pm-1:00pm – No noisy works (respite)
1:00pm-4:00pm - Works	
4:00pm-6:00pm – No noisy works (respite)	

4.6 Noise Management Contingency Measures

In the event of unacceptable noise as identified through complaints and investigation, contingency measures should be investigated and implemented which may include:

- Alternative equipment and/ or processes;
- Acoustic enclosures and/or screening; and
- Reviewing work schedules to minimise potential noise-associated impacts (e.g., respite periods).

Noise monitoring, if required, is to be undertaken by an acoustic consultant, directly engaged by the site manager. The monitoring should include the following:

- Differentiate the construction noise sources from background and/or other extraneous noise;
- Identify and document excessive noise emitted from construction machinery or operation; and
- Undertake additional readings in the event of a noise valid complaint.

5. Dust Control Plan

5.1 Air Monitoring and Controls

Dust shall be monitored during the construction works and must be managed by the site manager. If dust is created by the transport and movement of construction material, management options include, but are not limited to:

- Water carts to wet dust-prone surfaces;
- Mist cannons/dust suppression sprinklers on activities that generate dust; and
- Ceasing procedural works during extreme weather events such as high winds.

5.2 Dust Management

In the event that materials are required to be stockpiled on-site, they must be done in such a way that the material is well contained and surrounded with adequate erosion controls such as sediment fencing. If stockpiles are to remain onsite for an extended period, they must be covered with geofabric or heavy-duty plastic to avoid erosion. Stockpiles must be maintained to allow for identification in the case of them being used on-site.

6. Odour Control Plan

6.1 Odour Monitoring and Controls

Odour shall be monitored during the construction works and must be managed by the site manager. If odours are created by the excavation and earth moving works and transport and movement of construction material, management options include, but are not limited to:

- Ceasing procedural works during extreme weather events such as high winds; and
- Odorous materials may be placed in a bunded area and covered with impermeable plastic sheeting.

If odours are reported on-site, the odours should be investigated by an environmental consultant and a landfill gas meter will be employed to detect O_2, CH_4, and H_2S (if suspected). Additionally, the

environmental consultant will use a photonisation detector (PID) to detect volatile compounds. If the PID exceed >30ppm appropriate breathing masks must be worn by site workers. If reading exceeded >300ppm odour suppressants must be employed.

7. Site Soil and Water Management Plan

Measures are outlined in guidance from the Managing Urban Stormwater: Soils and Construction – Volume 1, 4th Edition, Landcom 2004. Refer to Preliminary Site Investigation Concept Plan and Stage 1; William Clarke College, 10 Morris Grove, Kellyville NSW (Ref. E25768.E01_Rev2), prepared by EI Australia in May 2023 for site condition for soil and groundwater.

7.1 Surface Waters Management

Site drainage is anticipated to follow with the site's topography. The regional topography surrounding the site has a gentle slope northwest. All site drainage is expected to flow into the municipal stormwater system or towards a dam within the northwestern portion of the site.

Stormwater outlets from the site may require sandbagging to filter stormwater migrating off-site. The following control measures should be implemented to minimise surface water runoff and must be in place prior to works commencing and assist in managing spills in the event of an environmental incident.

- Perimeter silt/ sediment fencing including temporary sediment traps or straw bales (where appropriate inside the site);
- Plant, equipment, and vehicles will be regularly inspected to ensure minimise leaks or spills and prevent pollution from being tracked either onto or from the site;
- Spill and sediment tracking off the site from vehicles leaving the site will be managed to minimise pollutant and sediment loads that could otherwise enter street stormwater catchment;
- Disconnecting and/ or capping/ sealing all services to underground stormwater and sewer connections either at ground level, as the pipes leave the site, or at the mains;
- Drain filters/sediment traps in front or near site entry points or shaker grids;
- Installation of tarps/coverings on-site waste bins during non-work hours to prevent materials blowing Stormwater flowing through the site should be avoided, if possible, stormwater should be diverted to run-off outside the site;
- Construction of stormwater diversion channels and linear drainage dumps with catch pits in the remediation area to divert and isolate stormwater from any contaminated areas; and
- Implementation of a sediment-specific management plan such as sediment fencing should be installed where stormwater may flow off-site.

7.1.1 Water Management

Appropriate measures must be undertaken to ensure that potentially contaminated sediments and water do not leave the site. This could include, but is not limited to:

- Stormwater flowing through the site should be avoided, and if possible, stormwater should be diverted to run-off outside the site;
- Construction of stormwater diversion channels and linear drainage dumps with catch pits in the remediation area to divert and isolate stormwater from any contaminated areas; and
- Implementation of sediment-specific management plan such as sediment fencing should be installed where stormwater may flow offsite.

In the event of flood flow for small to large size events, including 1 in 1 year ARI (Annual Recurrence Interval), 1 in 5 year ARI and 1 in 100 year ARI, the following measures will be implemented:

- 1 in 1 year ARI: The flood flow is expected to be confined to the main watercourse channels, and not reach the site;
- 1 in 5 year ARI: The flood flow is unlikely to reach the site; and
- 1 in 100 year ARI: The flood flow is expected to reach the site. This event requires mitigation measures, which include; daily weather observations, securing of site, machinery and construction

material when not in use, procedures for the removal of flood-sensitive machinery and construction materials, and an Emergency Response Plan to manage flood risk.

A strategy to maintain water management is to conduct a water quality monitoring program that includes the sampling, analysis and reporting of water quality from both within existing waterways or nearby waterways.

Furthermore, site flows from the site will be managed through:

- Bunding to direct site flows to stormwater drains or away from sensitive receptors;
- Drainage controls;
- Replace concrete patio slabs with pavers, flagstone, or bricks that allow water to soak between items; and
- Install a rain barrel to catch stormwater runoff.

7.2 Soil Stockpile Control

Soil materials to be stockpiled on site must be done in such a way that the material is well contained and surrounded with adequate erosion controls such as sediment fencing. If stockpiles are to remain onsite for an extended period, they must be covered with geofabric or heavy-duty plastic to avoid erosion. Stockpiles must be maintained to allow for identification in the case of them being used on-site.

7.3 Soil Management

7.3.1 Sediment Fencing

Geotextile sediment fencing is the most efficient and widely used sediment barrier for construction sites. These fences trap sediment while allowing water to leave the site. They retain suspended solids coarser than 20µm, are simple to construct, cost-effective and easily moved. For a construction site, sediment fences will be effective within the following parameters:

- Not designed to filter concentrated flows and therefore needs to be placed following the land contours whenever possible;
- It should last for up to six (6) months but requires regular maintenance and weekly checks. The performance of a sediment fence diminishes considerably when crushed by the delivery of building materials. It must remain vertical and keyed into the soil;
- Where the sediment fence is not installed correctly, water will inevitably flow through the point of least resistance forming a preferential pathway. Therefore, damaged fences must be repaired promptly;
- Sediment fences need to be trenched in at least 150mm and buried so that the water flows through and not underneath. Soil on both sides of the fence must be compacted to avoid seepage under the barrier; and
- If there needs to be a break in the fence for any reason (eg. an access point) a contour bank/diversion bank or bund needs to be constructed to direct water back to the fence. The sediment fence must have uphill returns at either end to prevent sediment from flowing around it.

7.3.2 Straw Baler Filter

Straw Baler Filters are suitable for low flows of water and are only recommended to be used in limited applications (eg. reducing velocity flow). Sufficient bales must be used across the site, if too few are used during a storm event this will likely increase erosion on the site.

7.3.3 Diversion

Where required, stormwater can be diverted up-slope with diversion banks. Diverted stormwater should be discharged onto stable areas and should not be diverted into neighbouring properties (without written permission from landowners).

7.3.4 Stockpile Locations

All stockpiles are to be stored in a designated location (at least two (2)m from hazard areas) behind sediment controls. Stockpiles are to be protected from surface waters by using diversion banks up-slope and with sediment structures down-slope.

7.3.5 Maintenance

Maintenance of sediment and erosion controls are required to ensure their success. If a storm event occurs during construction, evaluating the effectiveness of the established controls is required. A key strategy in an effective maintenance program is the ongoing modification of controls to accommodate changing conditions and stages of development. This includes anticipating potential risks and being prepared for changes, such as storing extra sediment fencing material.

8. Waste Management Plan

8.1 Waste Re-Use, Recycling, Storage and Control

All wastes generated during the project are effectively stored, handled, treated, reused, recycled and/or disposed of lawfully and in a manner that protects environmental values.

The objectives include:

- Recycle or re-use uncontaminated spoil either on- or off-site;
- Recycle or re-use materials either on- or off-site;
- Manage off-site water re-use in accordance with relevant NSW EPA resource recovery exemptions and requirements; and
- Dispose of waste at appropriately licenced facilities.

The measurements used for these objectives include audits and management reviews. Weighbridge dockets, landfill receipts and consignment disposal confirmation are to be provided to the environmental consultant and site manager. A truck log will be kept by the site manager detailing disposed loads against on-site origin. All loaded trucks and other project-related heavy vehicles carrying materials to result in dust generation will be covered to prevent dust emissions during transport in accordance with relevant road regulations. Waste is to be disposed of within licensed landfills that shall be in accordance with NSW EPA guidelines. Waste that is disposed of in locations other than licenced landfills shall be penalised in accordance with the landowners and NSW EPA guidelines.

All soil material to be removed from the site must be classified in accordance with NSW EPA (2014) *Waste Classification Guidelines*. No soil material is to leave the site without such classification.

8.2 Construction Material Waste

Waste (including construction waste) to be disposed of within licensed landfills that shall be in accordance with EPA guidelines. Waste that is disposed of in locations other than licenced landfills shall be penalised in accordance with the landowners and EPA guidelines.

8.3 Litter Control

All staff working on the project must dispose of litter (including wrappings, plastic takeaway containers, drink cans, cigarette butts and construction waste) in the appropriate areas. All litter produced on site is to be disposed of in accordance with EPA waste disposal requirements. A skip bin is required on-site for the collection of waste generated during the construction process. The skip bin must be located in close proximity to the construction area, however, must not obstruct or hinder construction processes. The skip bin requires appropriate coverage in the case of rain or wind to avoid unauthorised disposal of non-construction-related materials.

8.4 Waste Disposal and Removal Off-Site

All waste to be removed off-site must be documented to comply with audit and management review processes. This includes but is not limited to, weighbridge dockets, landfill receipts, consignment disposal confirmation, and truck logs for load disposal originating from the on-site origin. It is the responsibility of the site manager to ensure the collection, validation and archival process for all relevant documentation. Construction waste is to be disposed of within licensed landfills that shall be in accordance with EPA guidelines. Waste disposal timing will be undertaken based on the construction stage. Skip bins are not to be overfilled and must be filled sufficiently to warrant the energetic expense of undertaking the transportation and disposal of waste.

8.5 Construction Waste Volumes and Management

The approach to construction waste management covers all construction phases and has been developed with consideration of the Hills Shire Council, NEPM and NSW EPA requirements. By identifying the estimated waste generation and management for the construction waste associated with this development, strategic processes for management have been developed. This ensures that all waste resulting from construction activities is managed in an effective, safe and environmentally aware manner. Specifically:

- To minimise the generation of waste to landfill;
- To maximise waste material avoidance and reuse on-site;
- To ensure that where practicable, an efficient recycling procedure is applied to waste materials; and
- To raise awareness among employees and subcontractors of their waste management responsibilities.

Management strategies reflect current best-practice requirements and relevant Sections of the Protection of the Environment Operations Act 1997 and the NSW EPA Waste Classification Guidelines, Part 1: Classifying Waste, as well as consideration of industry best practices for this type of development. It will be the responsibility of the site developers to ensure all contractors clearly specify where all wastes are to be transported, the capacity of the nominated facilities to receive/manage the waste and ensure that reports on management aspects (types, quantities and disposal pathways) are provided.
Note: The testing and classification of any excavated material is not covered in this report. Where necessary separate specialist testing will be conducted by a suitably qualified person.

Table 4. Construction waste management

	Destination		
Type of Material	**On-Site (Reuse or Recycle)**	**Off-Site**	**Disposal**
Excavation material	Excavated Material will need to be Classified as either VENM/ENM for it be considered suitable for reuse onsite or reused on another site. Or if classified as a Waste, then it will need to be disposed of to an appropriately licensed facility.	If material is considered a Waste ie General Solid Waste, then the material must be disposed of to an appropriately licensed facility. Excavation materials will be collected and classified in accordance with NSW EPA regulations. If the material is considered natural material (VENM or	Facility: TBA upon appointment of a contractor. It must be classified in accordance with NSW EPA regulations prior to lawful disposal within a licensed facility.

		ENM) then it may be considered suitable to be utilized offsite at another property. However appropriate approvals and documentation will need to be kept for review.	
Concrete	No on-site reuse	Collected by contactor and disposed at concrete recycling facility	Facility: TBA upon appointment of contractor
Timber	No on-site reuse	Recyclable timber (untreated) will be collected and recycled at appropriate timber yard. Unrecyclable timber will be disposed at landfill	Facility: TBA upon appointment of contractor
Plasterboard	No on-site reuse	Collected by contactor and disposed at recycling facility	Facility: TBA upon appointment of contractor
Metal	No on-site reuse	Collected by specialist metal subcontractor for recycling	Facility: TBA upon appointment of contractor
Green waste	Where possible green waste material will remain on-site and be reused in landscape areas	Collected and disposed at green waste/mulching facility	Facility: TBA upon appointment of contractor. No disposal to landfill
Mixed hard plastics	No on-site reuse	Collected by contactor for recycling. Facility: TBA upon appointment with contactor	No disposal to landfill
Mixed recyclables	No on-site reuse or recycling	Separated on-site into dedicated receptacles. Collected by the waste subcontractor for recycling	Facility: TBA upon appointment of contractor. No disposal to landfill
General waste	No on-site reuse or recycling	Separated on-site into dedicated receptacles. Collected by the waste subcontractor for disposal to landfill	Facility: TBA upon appointment of contractor

All potentially recyclable materials are to be separated and stored on-site for an appointed waste/recycling contractor to inspect and determine the suitability of the material for recycling (or even reuse). If approved for either action, then the contractor can then remove the items. For materials that are not designated as potentially able to be reused or recycled, then they are to be disposed of at a landfill licenced to receive those specific materials.

9. Construction Traffic Management Plan

A Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) is to be prepared by a suitably qualified person.

In accordance with William Clarke College SSDA Conditions of Consent for Stage 1 Works Responsibility Matrix (SSD-35715221 MOD-2)

The CTPMSP will:

- *Be prepared by a suitably qualified and experienced person(s);*
- *Be consistent with the Section 9 - Construction Pedestrian and Traffic Management Plan Methodology (Stage 1) in the Traffic Impact Assessment prepared by Ptc dated 27 June 2023;*
- *Be prepared in consultation with Council and TfNSW;*
- *Detail the measures that are to be implemented to ensure road safety and network efficiency during construction inconsideration of potential impacts on general traffic, cyclists and pedestrians and bus services; and*
- *Detail heavy vehicle routes, access and parking arrangements.*

10. Unexpected Finds Protocol

Environmental incidents have the potential to occur during this type of work. For the purposes of this CEMP, environmental incidents include matters such as:

- Discovery of Aboriginal and non-Aboriginal items of heritage;
- Chemical spills and leaks including hydrocarbons;
- Fires;
- Discovery of Asbestos;
- Discovery of undocumented underground infrastructure;
- Aerosolised contamination including dust;
- Discharges of contaminated waters to the environment;
- Clearing or damage to vegetation outside of the designated clearing areas; and
- Breaches of the hygiene management actions.

The environmental management representative is to be informed of any potentially notifiable environmental incidents under the POEO Act and Conditions of Approval immediately. All incidents are to be reported within 24 hours.

An incident report will be prepared for any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment. A report outlining the basic facts will be supplied to the Hills Shire Council within 24 hours of the incident. A further detailed report will be prepared and submitted following an investigation of the causes and identification of necessary corrective action and additional preservative measures within five (5) days.

The cause or impacts of any incident as it relates to the Conditions of Approval will be addressed as per the Secretary of the Hills Shire Council and NSW EPA guideline requirements. Environmental incidents do not include matters where there is no impact, or no risk of impact, to the environment or do not cause concern for external groups, for example, a routine variance to compliance with this CEMP. All works must be carried out in accordance with relevant Australian Standards, NEPM and NSW EPA guidelines.

10.1 Unexpected Contamination

In the event that any unexpected materials or contamination are discovered, all works in the area must cease, and the environmental consultant is to be engaged for assessment. The environmental consultant will be required to document and report all discoveries of unexpected materials and follow the appropriate assessment, remediation and validation process. All unexpected findings and assessment documentation,

including waste disposal receipts, must be retained by the site manager. The environmental consultant will prepare a remedial approach based on the identified contamination. All reporting stages and procedures are to be undertaken in accordance with the NEPC, National Environment Protection (Assessment of Site Contamination) Measures (NEPM), 2013; NSW EPA, *Consultants Reporting on Contaminated Land: Contaminated Land Guidelines,* 2020; NSW EPA, *Contaminated Land Guidelines*, *Sampling Design Part 1 – Application*, 2022; NSW EPA, *Waste Classification Guidelines Part 1: Classifying Waste,* 2014.

10.2 Cultural Heritage Stop Work Protocol

Indigenous and non-indigenous heritage is protected by the *Environment Protection and Biodiversity Conservation Act 1999*, the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* and the *Protection of Movable Cultural Heritage Act 1986*.

If items or materials are identified or suspected to be present, a ***Stop Work*** is to be implemented and a suitably qualified consultant is to be engaged to undertake the following assessment:

- Preliminary Aboriginal Cultural Heritage Investigation (Level 1)
- Aboriginal Cultural Heritage Assessment (Level 2)

Based on the outcome of the assessment, work can only recommence on site once the heritage consultant or suitably qualified person has completed the assessment and considers the site suitable for continued works.

11. Incident Management Contingency

If an unexpected incident occurs the person responsible for the site must be contacted immediately. If the incident is related to any spills and leaks, contact an environmental specialist within 24 hours.

11.1 Contingency Management

On-site conditions can vary over sites; therefore, the CEMP must be dynamic and capable of adapting to unexpected conditions and materials. Unexpected conditions and materials can result in harm to human and environmental health and must be managed appropriately. The table below summarises conditions and materials which may be discovered during work.

Table 5. Unexpected conditions and remedial actions

Unexpected Condition/Material	Remedial Action
Excessive dust	Use mist cannons of dust generating activities; employ water carts to wet site roads.
Excessive rain/flooding	Maintain stormwater divergent channels and drainage sumps; maintain site roads and cover high traffic areas with gravel; cover stockpiles with heavy-duty plastic and surround with sediment fencing; shut down the site until stormwater is manageable.
Excessively wet materials	Leave in-situ if already stockpiled, dewater; surround with sediment fencing.
Sediment pond water for discharge, analytical exceedance	Perform water in-situ treatment methods until acceptable analytical levels are reported. Arrange off-site disposal by an appropriately licenced contractor.
Excessive odours	On-site scientist to constantly monitor with PID; site manager is to upgrade PPE if necessary.
Excessive noise	Identify source of noise, inspect equipment and repair accordingly; provide noise silencers if necessary.
Compliant management	Notify the site manager and principal environmental consultant. Report complaints as per internal WHS plan procedures.

Sediment fence failures	Cease works and repair; change sediment control method (hay bales, geofabric).
Oil/fuel spill	Cease works, refer to WHS plan, utilise spill kit, and move source to above impermeable surface.
Chemical spill	Cease works, refer to WHS plan, and notify environmental consultant immediately.
Equipment/ Machinery failures	Maintain spare parts, maintain alternate rental options.
Discovery of cultural and/or building heritage items	Cease works and notify the environmental consultant immediately.
Discovery of drummed material	Cease works and notify the environmental consultant immediately.
Asbestos Containing Material (ACM)	Cease works and notify the environmental consultant immediately. Employ appropriate PPE, wet the area to limit dust generation, cover it with heavy-duty plastic and create a 10m exclusion zone around the area.
Non-spreadable sludge	Contact environmental consultant; employ appropriate PPE, segregation and bunding of discovered material, use of odour suppressant; cover with heavy duty plastic; environmental consultant to employ appropriate sampling of material; offsite disposal will require appropriate waste classification.

11.2 Non-Compliances

If any works are suspected of not following procedures outlined in the CEMP or any other document that governs the procedural work procedures, this will be reported immediately to the principal environmental representative. The engaged environmental consultant has the authority to cease all procedural works until the issue is resolved.

12. Health and Safety Plan

Measures are outlined in guidance from the Occupational Health and Safety Management Systems – AS/NZS 4801:2001.

12.1 Work Health and Safety Plan

The site manager is responsible for implementing a site-specific Work Health and Safety Plan (WHS Plan) prior to procedural works in accordance with relevant Australian Standards, NEPM and NSW EPA guidelines. The WHS Plan must identify and assess risks that may be imposed on-site workers, occupants and the public.

The WHS Plan should detail subjects including vehicle decontamination, suitable Personal Protective Equipment (PPE) and safety controls. The WHS plan must be read and understood by Site Workers as part of their site induction, prior to beginning any procedural works.

Refer to Action Plan prepared by site manager.

13. Regulatory Approvals and Licenses

13.1 Duty to Report

Under Section 60 of the *Contaminated Land Management Act 1997*, the owner of the land that has become contaminated, whether before or during the owner's ownership, must notify the NSW EPA in writing.

13.2 State Environmental Planning Policy (Resilience and Hazard) 2021

The State Environmental Planning Policy (Resilience and Hazard) 2021 sets the regulatory framework for contaminated land and remediation works for NSW.

13.3 Asbestos

Asbestos must be managed in accordance with the Work Health and Safety Act (2011), the Work Health and Safety Regulation (2017), How to Safely Remove Asbestos: Code of Practice, SafeWork NSW Codes of Practice and NSW EPA (2014) *Waste Classification Guidelines*. Asbestos removal must be completed under the supervision of a NSW Licensed Asbestos Assessor (LAA) and by a licensed Asbestos removalist appropriately licensed to carry out Class A (friable) or Class B (non-friable) removals. SafeWork NSW must be notified by the licensed Asbestos removalist contractor 5 days before the Asbestos removal work is scheduled to commence.

Asbestos air monitoring should be undertaken at the site while Asbestos removal works within areas suspected to be contaminated with Asbestos are being completed. The Asbestos removal contractor is required to notify SafeWork NSW if respirable Asbestos fibre levels reach or exceed 0.02 fibres/mL. Asbestos air monitoring must be undertaken in accordance with SafeWork NSW Codes of Practice.

Part 7 of the POEO (Waste) Regulations 2014, details the special requirements relating to Asbestos waste and must be followed when dealing with Asbestos waste transportation and disposal.

The general requirements applying to the transportation of Asbestos include:

- Bonded Asbestos must be securely packed at all times during transportation (i.e. wrapped in a double layer of heavy-duty plastic);
- Friable Asbestos must be kept in a sealed container at all times during transportation;
- Asbestos-contaminated soils must be wetted down;
- All Asbestos waste (other than bonded or friable Asbestos material) including Asbestos contaminated soils must be covered and leak-proof during transportation; and
- Reporting on the transportation of Asbestos waste must follow Section 79, Part 7 of the POEO (Waste) Regulations 2014.

The general requirements applying to the disposal of Asbestos include:

- Only appropriately licensed landfill facilities are allowed to receive Asbestos waste;
- The person transporting the Asbestos waste must notify the landfill facility Manager that the load contains Asbestos;
- Unloading the Asbestos waste must be done so that no dust is generated and employ dust suppression techniques; and
- Once deposited at the licensed landfill facility, Asbestos waste is to be stored appropriately.

13.4 NSW Water Construction Dewatering License

If groundwater is reached during excavations for the inground pool, a Dewatering Management Plan is required. This will oversee the process for the groundwater that may need to be discharged off-site. Prior to any discharge of groundwater off-site, a license is required from NSW Water.

13.5 Additional Licensing

Transporters of contaminated waste are required to be appropriately licensed to transport waste material. Waste classification documentation and landfill facility receipts must be kept on file for the site's validation program.

14. Maintenance Schedule and Procedures

During work, the site manager must be on-site to ensure that all workers follow the Occupational Health and Safety guidelines and relevant NSW EPA guidelines. If any unexpected incident occurs in regard to the environmental condition of the site and/or surrounding area, contact an environmental consultant.

15. Conclusion

This CEMP is to remain in place for the duration of construction works. This plan is considered a living document and should be updated as required which may include at the following times:

- Changes in conditions on-site;
- Ineffective control measures;
- Regulatory revisions, updates or new releases; and
- Revision to the proposed site activities.

Limitations

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