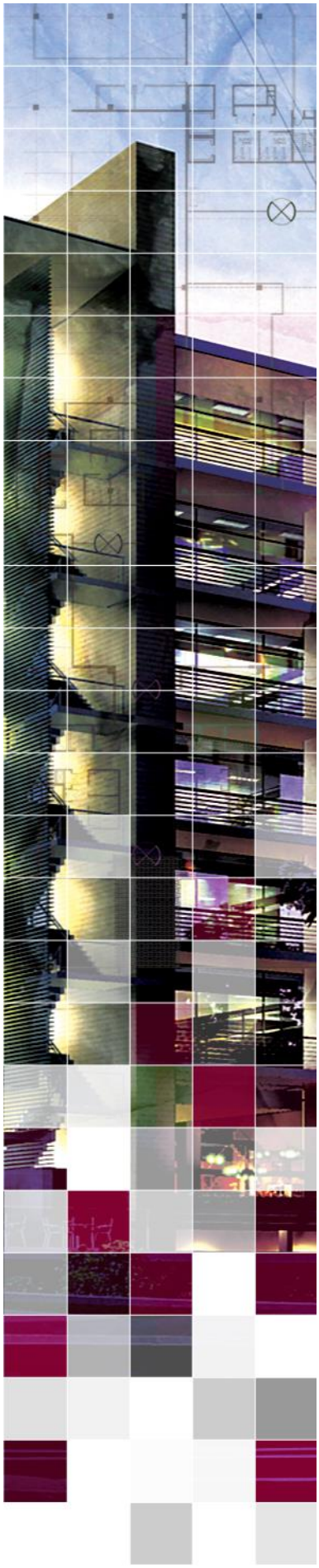

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

23-43 and 45 Tattersall Road, Kings Park

Kings Park Metal Recovery, Processing and Recycling Facility - Development Consent No. SSD 5041

For:

Sell & Parker Pty Ltd

Submitted to:

NSW Department of Planning and Environment

Date:

March 2018

2016.0033 CEMP

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TABLE OF CONTENTS

APPENDICES

LIST OF FIGURES

LIST OF TABLES

GLOSSARY OF ABBREVIATIONS

AQMP	Air Quality Management Plan
BCC	Blacktown City Council
BEMS	Blacktown Environment Management System
BOM	Bureau of Meteorology
CEMP	Construction Environmental Management Plan
DA	Development Application
DP&E	Department of Planning and Environment
ECS	Emissions Collection System
EIS	Environmental Impact Statement
EPA	Environmental Protection Authority
EPL	Environment Protection Licence
EP&A Act	Environmental Planning and Assessment Act
ERM	Environmental Resources Management
KPI	Key Performance Index
LMP	Landscape Management Plan
LMS	Learning Management System
NSW	New South Wales
NMP	Noise Management Plan
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act
SSD	State Significant Development
WMP	Water Management Plan

Construction Environmental Management Plan (CEMP) prepared by	
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Qualifications	BSc(Hons)
Address	Level 3, Suite 305, 26 Ridge Street, North Sydney NSW 2060

Part 4 development	
Proponent name	Sell & Parker Pty Ltd
Proponent address	11 Meadow Way, Banksmeadow NSW 2019
Land affected	Sell & Parker's Kings Park Metal Recovery, Processing and Recycling Facility at 23-43 and 45 Tattersall Road, Kings Park

Approved development	Development Consent No. SSD 5041/2015

We certify that we have prepared the contents of this CEMP to the best of our knowledge it is in accordance with the *Environmental Planning and Assessment Act 1979* and the *Environmental Planning and Assessment Regulation 2000*, and it contains all available information that is relevant to the Kings Park Metal recovery, Processing and Recycling Facility Construction Environmental Management Plan. It is true in all material particulars and does not, by its presentation or omission of information, materially mislead.

1. INTRODUCTION

1.1 BACKGROUND

This Construction Environmental Management Plan (CEMP) has been prepared by Higgins Planning in collaboration with Sell & Parker Pty Ltd for the "Kings Park Metal Recovery, Processing and Recycling Facility", referred to in this CEMP as "metal recycling facility", at 23-43 and 45 Tattersall Road, Kings Park. The metal recycling facility was approved for a site and processing capacity expansion by the Department of Planning and Environment (DP&E) Development Application State Significant Development (SSD) No. 5041 dated 12 November 2015 subject to conditions and approval was granted to a Section 96 application through the Land and Environment Court on 19 October 2017, which included a revised site layout, referred to as Mod 1 in this CEMP. A further Mod 2 was approved by DP&E on 26 February 2018.

1.2 PURPOSE OF THIS CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

This CEMP has been prepared on behalf of Sell & Parker Pty Ltd (Sell & Parker) in response to conditions A2 and C1 of Development Consent No. SSD 5041/2015 dated 12 November 2015, Mod 1 dated 19 October 2017 and Mod 2 dated 26 February 2018.

In particular, this CEMP:

- Describes the Construction Management of the project including activities to be undertaken and relative timing;
- Provides specific mitigation measures and controls that can be applied on-site to avoid or minimise negative environmental impacts;
- Provides specific mechanisms for compliance with applicable policies, approvals, licences, permits, consultation agreements and legislation;
- Describes the construction management related roles and responsibilities of personnel;
- States objectives and targets for issues which are important to the environmental performance of the Project; and
- Outlines a monitoring regime to check the adequacy of controls as they are implemented during construction.

The purpose of this CEMP is to detail how Sell & Parker will manage potential environmental impacts from its construction operations at the approved metal processing and recycling plant at Kings Park.

This CEMP details the construction management procedures and this CEMP forms part of the Operational Environmental Management Plan (OEMP).

This CEMP has been prepared to address the requirements of condition C1 of Development Consent No. SSD 5041/2015 dated 12 November 2015.

The structure of this CEMP is based on the Department of Infrastructure Planning and Natural Resources "Guideline for the Preparation of Environmental Management Plans", as well as the requirements of the Environmental Impact Statement (EIS) and supporting documents.

This CEMP has been prepared based on information from the WMP, LMP, NMP and AQMP. This CEMP forms part of condition A2 of Development Consent No. SSD 5041/2015 dated 12 November 2015 and as amended by Mod 1 & Mod 2, which states:

TERMS OF CONSENT

A2. The Applicant shall carry out the Development in accordance with the:

a) EIS prepared by ERM dated July 2014;

b) Response to Submissions report prepared by ERM dated 7 January 2015;

c) Supplementary Response to Submissions prepared by Mecone dated 30 June 2015;

d) Supplementary Response to Submissions prepared by Sell & Parker Pty Ltd dated 3 September 2015;

e) Site layout plans and drawings (See Appendix A);

f) Management and Mitigation Measures (see Appendix B); and

g) Modification Application SSD 5041 MOD 1 and accompanying document titled Statement of Environmental Effects 23-43 and 45 Tattersall Road, Kings Park dated August 2016 prepared by Higgins Planning, additional information from Higgins Planning dated 22 December 2016, further additional information from Allens and Linklaters dated 9 February 2017 and the Town Planning Report prepared by Ethos Consulting on 29 September 2017 and;

h) Modification SSD 5041 MOD 2 and accompanying document titled Statement of Environmental Effects 23-43 and 45 Tattersall Road, Kings Park dated December 2017 prepared by Higgins Planning.

In addition, Sell & Parker have had consultation meetings and discussions with both the Environment Protection Authority and DP&E as required to assist with the preparation of this CEMP.

1.3 SITE LOCATION AND CONTEXT

The site is located in the mid-block of Tattersall Road, Kings Park and approximately 2.5 kilometres from the M7. This location is depicted in **Figure 1.** Kings Park is located within the Local Government Area (LGA) of Blacktown City Council, and is located approximately 41.2 kilometres from the Sydney Central Business District (CBD).

Figure 1: Location context (subject site identified by red outline)

Source: Google Earth

1.4 SITE DESCRIPTION

The site is located on the southern side of Tattersall Road, Kings Park (see **Figure 1**). The site has a legal description of Lot 2 in DP 550522 and Lot 5 in DP 7086. The site is significantly lower than the level of Tattersall Road to the north and is relatively flat/level with a fall towards its rear boundary. The site is largely cleared, with the exception of some trees scattered across the perimeter front and rear boundaries.

The existing metal processing plant is obscured from view when travelling along Tattersall Road due to the existing trees at the Tattersall Road frontage of the land between the property boundary and the existing acoustic wall along the frontage of the portion of the site at 45 Tattersall Road. An open storm water drainage channel runs along the eastern boundary. Adjacent to the site's southern boundary is Breakfast Creek.

1.5 EXISTING ENVIRONMENT AND SENSITIVE RECEPTORS

The approved metal recycling facility is surrounded by industrial and commercial properties within a 500 metre radius with the exception being where houses back onto Sunnyholt Road to the east. The nearest residential homes are approximately 350 metres from the approved site. Detailed information can be found in the Renzo Tonin Supplementary Noise and Vibration Impact Assessment (**Appendix L**).

The nearest watercourse is located along the rear or southern boundary of the site, known as Breakfast Creek. Breakfast Creek is a modified urban waterway that flows through the industrial estate from the west to the east (refer to **Figure 2** below). Detailed information regarding site water management can be found in the Stormwater Management Plan prepared by ADW Johnson (**Appendix M**), and the Water Management Plan (**Appendix H**).

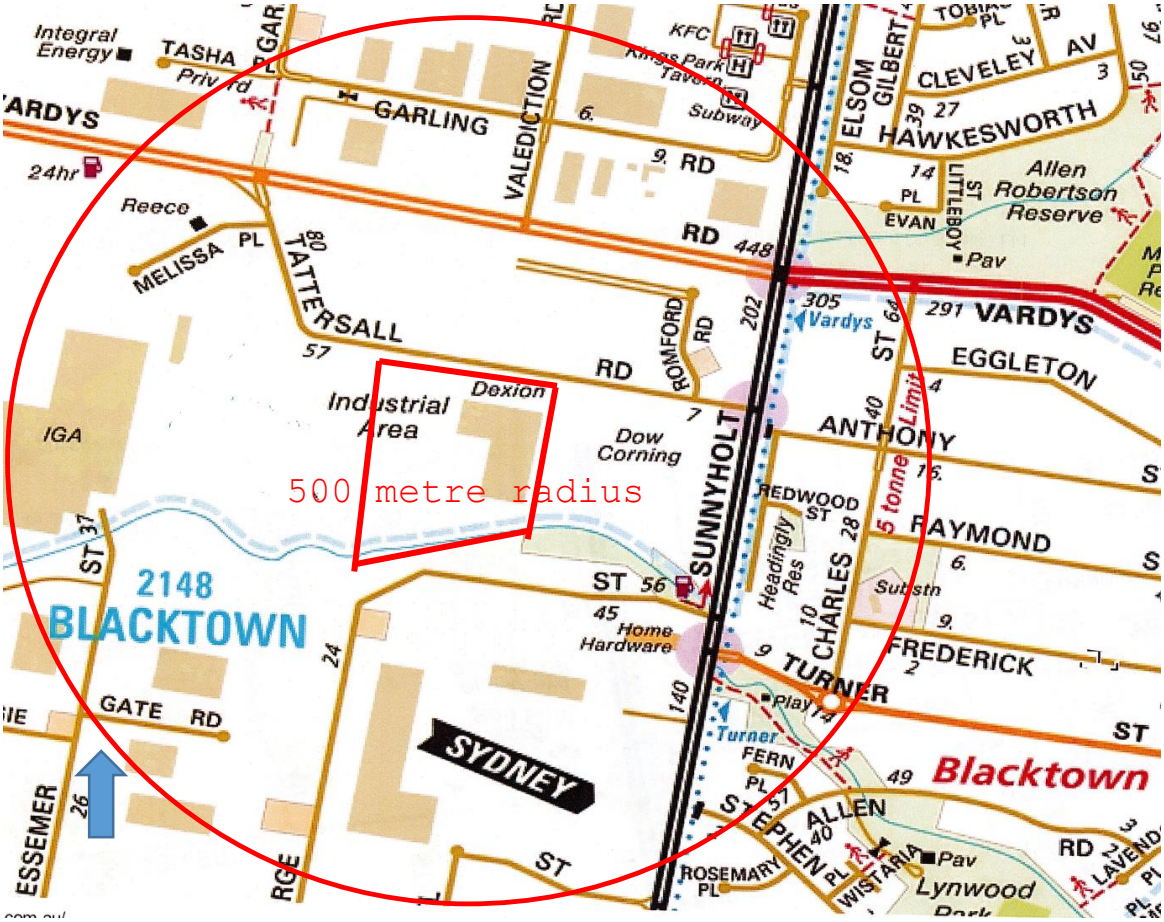

Figure 2: Map Extract showing location of sensitive receptors within 500m of the site (subject site identified by red outline)

Source: Google Earth

For information on construction mitigation measures, monitoring, controls and exceedance management measures refer to sections 6, 7, 8 and 9 of this plan.

1.6 SCOPE

The Scope of this CEMP includes:

- An overview of the potential environmental impacts of construction activities of the development;
- A description the management measures to protect the environment;
- An overview of the site operations (also refer to the Site Layout Plan in **Appendix A**);
- Guidance on compliance with the relevant environmental legislation including the EPA License (copy at **Appendix D**) and Development Consent (copy at **Appendix C**);
- Provision of appropriate mitigation measures for the key environmental issues;
- Definitions of the roles and responsibilities of the construction related team;
- The basis for monitoring, reporting and maintaining compliance with regulatory requirements; and
- The relevant construction related parts of the below management plans which are required as conditions of the consent:
    - Noise Management Plan (**Appendix F**);
    - Water Management Plan (**Appendix H**);
    - Air Quality Management Plan (**Appendix G**); and
    - Landscape Management Plan (**Appendix I**).

1.7 CONSTRUCTION MANAGEMENT SYSTEM CONTEXT

The CEMP is one of the "seven pillars" of the Sell & Parker's Metal Recycling and Processing Plant's – "Blacktown Environment Management System" (BEMS) temple.

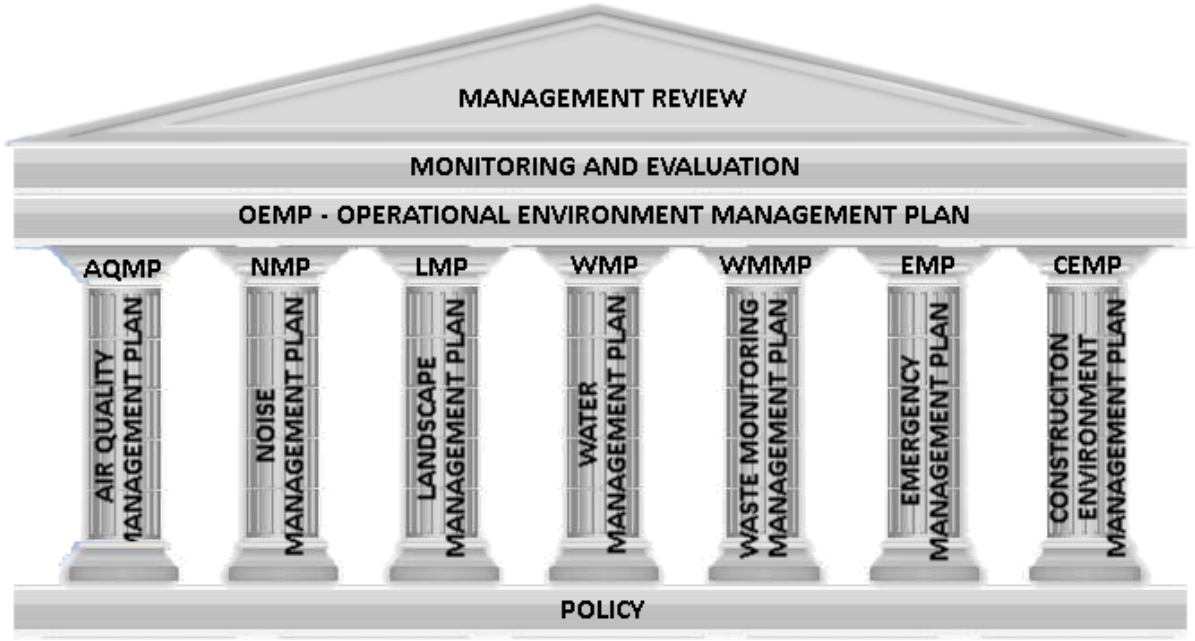

Figure 3: BEMS Temple

Source: Sell & Parker

The BEMS establishes management responses and frameworks for each management plan and implementation at Sell & Parker Kings Park. The BEMS sets the evaluation triggers which will ensure systems and processes are reviewed in the drive for continuous improvement.

1.8 CEMP OBJECTIVES AND OUTCOMES

Table 1 below outlines the key objectives of this plan and the expected outcomes resulting from the construction of the Project.

Table 1: *CEMP Objectives and Outcomes*

Objectives	Outcome
To ensure compliance with all applicable regulatory conditions for the facility.	Compliance is achieved, maintained and verified through independent auditing.
To minimise non-compliances.	Improved environmental protection.
To implement agreed construction management mitigation measures for the life of the consent.	All agreed construction management and mitigation measures are implemented and maintained.
To use technology when it becomes available to ensure ongoing improvement and environmental protection.	Continuous improvement so compliance is met now and into the future.

1.9 ENVIRONMENTAL POLICY

Sell & Parker are committed to operating to the principles of continuous improvement and reducing the sites environmental footprint. This is outlined in the Sell & Parker Environment Policy, a copy of which is included at **Appendix B** and available on the Sell & Parker website, www.sellparker.com.au under links and Environmental Reports. All employees and contractors undergo an induction which includes familiarisation with the requirements of the Environment Policy.

2. LEGAL AND CONSENT REQUIREMENTS

This section details the legislative requirements that relate to the site in terms of construction management.

2.1 LEGISLATION

Legislation relevant to construction management:

- National Construction Code (NCC) (Building Code of Australia BCA);
- NSW *Protection of the Environment Operations Act* 1997;
- NSW *Protection of the Environment Operations (General Regulation)* 2007;
- NSW *Protection of the Environment Operations (Noise Control) Regulation* 2008;
- NSW *Protection of the Environment Operations (General) Regulation* 2009;
- NSW *Protection of the Environment Operations (Clean Air) Regulation* 2010; and
- NSW *Protection of the Environment Operations (Waste) Regulation* 2010.

2.2 CONSENT

The consent for the site is the Department of Planning and Environment Development Application consent No. SSD 5041 dated 12 November 2015 including approved documents in condition A2 and the EIS prepared by ERM on July 14, 2016. A copy of the consent, Mod 1 and Mod 2 are attached in **Appendix C, C1 and C2**.

2.3 CONSENT CONDITIONS

Table 2 below details the Construction Environmental Management Plan C1 consent condition and where in this document each component has been addressed:

Table 2: *CEMP Condition C1 summary and document reference*

Consent Condition	Document Reference
C1*) Prior to the commencement of construction of the Development, the Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must:*	
a*) be prepared by a suitably qualified and experienced person(s);*	Sections 1.1 & 1.6
b*) describe all activities to be undertaken on the site during construction, including a clear indication of construction stages;*	Section 6.1

Consent Condition	Document Reference
***c**) identify the statutory approvals that apply to the Development;*	Section 2
***d**) outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment;*	Section 6
***e**) detail how the environmental performance of the construction will be monitored, and what actions will be taken to address identified adverse environmental impacts;*	Section 8
***f**) describe of the roles and responsibilities for all relevant employees involved in construction;*	Section 3.0
***g**) include arrangements for community consultation and complaints handling procedures during construction; and*	Sections 2.7.3 & 10.0
***h**) consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent.*	Sections 6, 7, 8 & 9

2.4 CONSENT CONDITIONS COMPLIANCE

Development Consent No. SSD 5041 (refer **Appendix C**), Mod 1 & Mod 2 (refer to **Appendix C1 & C2)**, provides details of all DP&E requirements for the site's development. In Table 3 below are the specific construction management control, mitigation and monitoring requirements. The table has a document reference column indicating where the requirement is specifically addressed in the plan and/or other documentation.

***Table 3:** Development Consent Construction Conditions Compliance Table*

Section	SSD 5041 Construction Conditions	Document Reference
A6	*Shall ensure that all new buildings and structures and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the Building Code of Australia.*	Section 7.1
A12	*Shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.*	Sections 7.2
B2	*A section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water prior to the commencement of construction.*	Obtained – refer to Appendix O
B4	*Prior to the commencement of construction of the Development, the Applicant shall prepare a Water Management Plan to the satisfaction of the Secretary.*	Submitted – refer to Appendix H

Section	SSD 5041 Construction Conditions	Document Reference
B9	*Shall implement erosion and sediment control measures on-site in accordance with Managing Urban Stormwater – Soils and Construction Vol. 1 (Landcom, 2004);*	Section 7.5.2
B11 a)	*Shall ensure that the finished floor level of any new building is a minimum of 0.5 metres above the 1 in 100 year Average Recurrence Interval flood level;*	Section 7.1
B11 b)	*Shall ensure that any part of a new structure below the 1 in 100 year Average Recurrence Interval flood level is designed and constructed to be compliant with flooding;*	Section 7.1
B11 c)	*Shall ensure any perimeter fence or wall does not restrict or impede the flow of overland flow;*	Section 7.1
B12 a)	*Shall ensure that only VENM or ENM or other material approved in writing by the EPA is used as fill on the site;*	Section 6.3.7
B12 b)	*Keep accurate records of the volume and type of fill to be used;*	Section 6.3.7
B12 c)	*Make these records available to the Department upon request;*	Section 6.3.7
B13 a)	*Prior to commencing any excavation works, the Applicant shall identify all potential contaminants that could be disturbed, mobilised and discharged to the receiving waters;*	Section 7.3
B13 b)	*Prior to commencing any excavation works, the Applicant shall detail the procedures for testing, classifying, handling storing and disposing of contaminated water, soils and/or groundwater encountered in excavations, in particular during excavations of the stormwater detention basin;*	Sections 7.3
B13 c)	*Prior to commencing any excavation works, the Applicant shall detail the measures for periodically testing surface water run-off that may accumulate in excavations and the procedures for off-site disposal of contaminated water;*	Section 7.3
B14	*The Applicant shall provide a contamination report to the Department detailing any contamination investigation carried out in the immediate vicinity of the existing detention basin. This report shall be provide to the Department on completion of the works to upgrade the detention basin;*	Section 7.3
B17	*Prior to the commencement of construction of the Development, the Applicant shall prepare an Air Quality Management Plan to the satisfaction of the Secretary.*	Submitted – refer to Appendix G
B17 c)	*The Air Quality Management Plan shall include well defined triggers for the deployment of construction and operational air quality measures;*	Section 6 & AQMP
B22 a)	*During construction ensure that all vehicles on site do not exceed a speed of 30 kilometres per hour;*	Section 6.3.1
B22b)	*During construction all loaded construction vehicles entering or leaving site have their loads covered; and*	Section 6.3.1

Section	SSD 5041 Construction Conditions	Document Reference
B22c)	*During construction all construction vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking the materials on public roads.*	Section 6.3.1
B29	*Prior to the commencement of construction of the Development, the Applicant shall prepare a Noise Management Plan to the satisfaction of the Secretary.*	Submitted – refer to Appendix F
B31	*Comply with the construction hours, unless otherwise agreed to in writing by the Secretary;*	Section 5.2
C1	*C1**)** Prior to the commencement of construction of the Development, the Applicant shall prepare a Construction Environmental Management Plan to the satisfaction of the Secretary. The Plan must:*	
C1a)	*Be prepared by a suitably qualified and experienced person(s);*	Sections 1.1 & 1.6
C1b)	*Describe all activities to be undertaken on the site during construction, including a clear indication of construction stages;*	Section 6.1
C1c)	*Identify the statutory approvals that apply to the Development;*	Section 2
C1d)	*Outline all environmental management practices and procedures to be followed during construction (e.g. construction traffic management and construction noise and vibration management), including all reasonable and feasible mitigation measures to protect the amenity of the surrounding environment;*	Section 6
C1e)	*Detail how the environmental performance of the construction will be monitored, and what actions will be taken to address identified adverse environmental impacts;*	Section 8
C1f)	*Describe of the roles and responsibilities for all relevant employees involved in construction;*	Section 3.0
C1g)	*Include arrangements for community consultation and complaints handling procedures during construction; and*	Sections 2.7.3 & 10.0
C1h)	*Consolidate the construction related parts of any management plans and monitoring programs required in the conditions of this consent.*	Sections 6, 7, 8 & 9
C2	*Shall carry out the development in accordance with the Construction Environmental Management Plan approved by the Secretary, unless otherwise agreed by the Secretary;*	This Plan
C5	*Ensure that the environmental management plans are prepared in accordance with relevant guidelines.*	Sections 1.5 & 2.6
C5 a)	*Environment management plans have detailed baseline data.*	Sections 5 & 8.6
C5 b) i)	*Environment management plans have a description of relevant statutory requirements.*	Section 2

Section	SSD 5041 Construction Conditions	Document Reference
C5 b) ii)	*Environment management plans (EMP's) include relevant limits or performance measures.*	Section 5
C5 b) iii)	*EMP's include specific performance indicators that are proposed to judge the performance of the development.*	Section 5
C5 b) iv)	*EMP's include the measures to be implemented to comply with statutory requirements, limits, performance measures or criteria.*	Section 9.1, 6.3 AQMP, WMP, NMP & LMP
C5 c) i)	*Monitoring program to report on the impacts and performance of the development.*	Sections 8
C5 c) ii)	*Monitoring program to report on the effectiveness of management measures.*	Section 12.0
C5 c) iii)	*Monitoring program for contingency to manage unpredicted impacts and their consequences.*	Section 9
C5 c) iv)	*A program to investigate and implement ways to improve environmental performance of the development over time.*	Section 12.0
C5 d) i)	*A protocol for managing and reporting incidents.*	Section 9.2
C5 d) ii)	*A protocol for managing and reporting complaints.*	Section 10.0
C5 d) iii)	*A protocol for managing and reporting non-compliances with statutory requirements.*	Section 9
C5 d) iv)	*A protocol for managing exceedance of the impact assessment criteria and/or performance criteria.*	Section 9.1
C5 d) v)	*A protocol for periodic review of the plan.*	Section 12.0
C7	*Incident reporting.*	Section 9.2
C8	*Provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting requirements in any plans or programs approved in the consent.*	Section 9.5
C9	*Audits.*	Section 11
C10	*Within 3 months of commissioning the audit, submit a copy of the report to the secretary, together with responses to any recommendations contained in the audit report.*	Section 11.2
C11	*Annual review*	Section 12.0
C12	*Revision of plans*	Section 13.0

2.5 LICENCE

The Sell & Parker Kings Park metal recycling facility operates under an Environment Protection Authority (EPA) licence. This Environment Protection Licence (EPL) 11555 has been modified to reflect the SSD 5041 approval and the proposed changed operational conditions. EPL 11555 is available on the EPA (NSW) website and the Sell & Parker website, www.sellparker.com.au, under links and Environmental Reports. The licence is attached in **Appendix D**.

2.6 STANDARDS AND GUIDELINES

The main standards, policies and guidelines relevant for the development and operation of the site include:

- Building Code of Australia (BCA) – Volume 1 – Class 2 to 9 Buildings (Commercial buildings);
- *Australian Standard AS 2601:2001: The Demolition of Structures*
- AS/NZS 3580.10.1:2003 Methods for sampling and analysis of ambient air – Determination of particulate matter – deposited matter – gravimetric method;
- Approved methods for the Sampling and Analysis of Air Pollutants in New South Wales (NSW DEC, 2006);
- Managing Urban Stormwater – Soils and Construction Vol. 1 (Landcom, 2004);
- Guidance on the assessment of dust from demolition and construction (IAQM 2014).

2.7 CONSULTATION PROCESS

2.7.1 Internal

Discussions with directors, senior managers, key personnel and contractors have been conducted in the development of this plan.

2.7.2 External

The following authorities have been consulted with in relation to requirements of this CEMP;

- NSW Department of Planning and Environment (DP&E);
- NSW Environment Protection Authority (EPA); and
- Blacktown City Council (BCC).

No issues have been raised by other government authorities.

2.7.3 Community

Feedback from the community was sought during the development application process. This feedback was considered in the development of this plan.

The process by which the community was consulted included:

- Community consultation meeting; and

- Mailbox drop.

Sell & Parker aims to ensure that the local community remains informed of the progress of the project in a pro-active and responsive manner. Sell & Parker's communication may include the following where applicable:

- Letter box drops
- Meetings and correspondence with appropriate regulatory authorities; and
- Discussions with adjoining neighbours who may be affected by the Development.

The key objectives of the community focused communication and consultation program include:

- Educating stakeholders regarding key aspects of the Development.

Sell & Parker remains open to community comments on the Development and feedback can be provided via the Sell & Parker website www.sellparker.com.au and complaints phone service on 02 8212 9561.

Prior to the commencement of construction and during the construction process, letter box drops and informal meetings will occur with the closest neighbouring businesses along Tattersall Road.

3. ROLES AND RESPONSIBILITIES

The key positions and their environmental duties around water quality management are outlined in Table 4 below.

***Table 4**: CEMP Roles and Responsibilities*

Company	Role	Responsibility
Sell & Parker	Development Manager	Overall development co-ordination • Appointment of Builder • Will run Project Control Group Meetings (PCG's)
Sell & Parker	Yard Manager	Site Operational activities • Daily liaison with builder • Daily site walks to monitor construction • Approve any construction matters that impact the operation of the site
Sell & Parker	Yard Operators/general hands	Traffic Management • For both Operational and Construction Traffic • To follow all reasonable directions
Sell & Parker	Group Operations Manager	Overall operational activities • Oversee any construction matters that impact the operation of the site

Company	Role	Responsibility
Sell & Parker	Group Safety Manager	Overall Site Safety • Approve any safety matters that impact the operation of the site • Ensure the builder has site specific Safety Plans and Safe Work Method Statements • Ensure Builder compliance with Sell & Parker Contractor Management System
Sell & Parker	Group Environment Manager	Environmental Aspects • Liase with relevant authorities as required • Continued development of EMP and revision where required • Review monitoring reports for compliance – advise Builder of any concerns • Inspect works and where required do sampling
Builder (yet to be appointed)	Project Manager	Project Management of Construction • Detailed Construction Program • Compliance with Sell & Parker Contractor Management System (Insurances, Public Liability, Long Service Levy, Work Method Statements, Required Building Permits and Authority Approvals) • Select Construction Team • Responsible for all construction on site • Undertake Community liason (as required) • First point of contact for Construction complaints • Daily site walks and inspections • Compliance with all Sell & Parker Construction related Plans and Procedures • Coordinating any Unexpected Finds Issues with the Group Environment Manager. • Development of Construction Waste Management Program • Attendance of PCG's • If required written meeting minutes • Ensure environmental compliance for construction related activities (noise, dust and impact on adjoining businesses)
Builder (yet to be appointed)	Leading Hand	Daily Construction • Install and maintain environmental controls as listed in the Sell & Parker Construction plans and procedures • Compliance with Environmental Construction Controls • Daily Site Walks • Daily Construction Tasks

Company	Role	Responsibility
		• Staff Inductions • Waste Management • Bunding, water discharge management (if required) • Communication with Project Manager on any site incidents, spills • Daily Construction Team Work Health and Safety management • Maintain safety data sheets • Compliance with construction DA conditions, Authority construction approvals
Builder (yet to be appointed)	Operators/general hands	Daily Construction • To follow all reasonable directions

4. CONSTRUCTION INDUCTION, TRAINING AND TOOLBOX TALKS

All on site employees and contractors will undergo site induction and training relevant to construction via the Learning Management System (LMS). Training will vary depending on specific duties performed but will include:

- Requirement for appropriate Personal Protective Equipment;
- Relevant legislation;
- Relevant Consent requirements;
- Key environmental construction related issues;
- EPA Licence requirements;
- Requirement for current construction related license, WHS documentation;
- Relevant details of the CEMP including;
    - Purpose;
    - Objectives;
    - Mitigation measures for the control of construction related environmental issues;
    - Incident Response and reporting requirements;
    - Information relating to the location of environmental constraints;
- Relevant Construction related Monitoring processes;
- Site Evacuation Processes; and
- Complaint process.

Training programs are designed by the Group Human Resources Manager, Group Safety Manager, the Group Environment Manager and the Builder Project Manager. The Site Manager is responsible for ensuring training is undertaken, as outlined in section 4 of this plan.

Toolbox talks will be one method of raising awareness and educating personnel on issues related to aspects of construction including environmental issues. The toolbox talks will be used to ensure environmental awareness continues throughout construction.

Toolbox talks relating to environmental issues may include but are not limited to

- The relevant construction activities that will be happening on that day and the required

- Noise minimisation measures
- Erosion and sediment control
- Hours of work
- Construction traffic
- Dust Control and
- Emergency Response Steps
- Workplace Safety Requirements

The Project Manager and Leading Hand will be responsible for these construction toolbox talks and they will be actioned on an as required basis.

5. OPERATIONAL CRITERIA

The Construction Operational Criteria as specified in the consent includes

5.1 ODOUR

As specified in Consent Condition B15, Sell & Parker shall ensure the development does not cause or permit the emission of any offensive odour as defined in the POEO Act 1997.

5.2 HOURS

Sell & Parker facility has the following operational hours as specified in B31 of the consent.

***Table 5**: Construction Hours*

Construction Hours	
Monday to Friday	7:00 am to 6:00pm
Saturday	8:00 am to 1:00pm
Sunday	Nil
Public Holidays	Nil

5.3 EMISSION LIMITS

Sell & Parker facility has the following site air quality emission limits, as outlined in the EIS;

***Table 6**: Construction Emission Limits*

Pollutant	Unit of Measure	100 percentile limit	Averaging period
Fugitive dust	µg/m^3	50	4 hour rolling average

5.4 NOISE LIMITS

As per Consent Condition B26, the Sell & Parker facility has the following noise limits.

***Table 7**: Construction Noise Limits*

Location	Noise Criteria (dB(A))			
	Day	Evening	Morning Shoulder	
	LAEQ (15 minute)	LAEQ (15 minute)	LAEQ (15 minute)	LAEQ (15 minute)
189 Sunnyholt Road	46	46	46	58

5.5 AIRBLAST OVERPRESSURE LIMITS

As specified in Consent Condition B25, the airblast overpressure level from explosions on the premises is not to exceed 120dB (Lin Peak) when measured at the boundary of the premises.

5.6 CONSTRUCTION RELATED ENVIRONMENTAL IMPACTS – RISK ASSESSMENTS

An overview of the potential environmental impacts on aspects of the environment due to construction activities are included in the below water quality, land, noise and vibration and air quality risk assessments. The risk assessment procedure is attached in **Appendix K**, which details how the risk rankings are determined.

Mitigation Measures to address these potential Risk Assessment related Environmental Impacts are also included in this section. Please note that further mitigation measures are detailed in Section 6.3.

Water quality

As the majority of the development involves the assembly of prefabricated equipment, emissions to ground that could affect waterways are expected to be minimal. There is a potential for transmission of particulates from earthworks.

***Table 8**: Water Impacts of Construction Risk Assessment*

Issue	Potential Impacts	Comment	Risk Ranking
Water	Increase in potable water use due to construction	The existing site currently is classified as a high water user. The limited development construction required is only anticipated to have minimal water use increases associated around peak construction requirements. Additional onsite rainwater retention for operational purposes is planned.	Low
	Discharge to neighbouring waterways.	As minimal increase in water usage is expected, no discharge to neighbouring waterways is planned. Water treatment systems to be upgraded. Stormwater drains fitted with sediment and hydrocarbon collection filters.	Low
	Flooding will result in downstream contamination	The Site is and will remain self-contained due to onsite water retention.	Low
	Impervious surfaces will increase flood potential	There is no increase in the impervious footprint. Demolition of existing buildings will result in a reduction of flow to neighbouring waterways.	Low
	Construction works	Diversion devices in place. Material stockpiles have sediment controls. Soil tested. Water in trenches tested. Drains protected Works regularly inspected.	Medium

Mitigation Measures to address Risk Assessment of Potential Water related Environmental Impacts

All works are to be conducted as per the WMP. Sediment screens are to be installed around material stockpiles for excavation works as well as landscaping works. Screens are to remain in place until the stockpile is removed or the landscaping has been established. Diversions are to be put in place for all trench work to ensure water is diverted around the trenches. Bunding is to be in place around drains in the vicinity of construction and excavation works. Site drains that go to stormwater currently have sediment collection bags installed.

These erosion and sediment mitigation measures and controls have come from the ERM Stormwater Management Plan of June 2015 and the ERM Soil and Water Management plan for excavations May 2016 and are included in the attached Water Management Plan Appendix H.

Land

As the majority of the development involves the assembly of prefabricated equipment, emissions to ground from construction activities are expected to be minimal. There is a potential for transmission of particulates from earthworks.

***Table 9**: Land Impacts of Construction Risk Assessment*

Issue	Potential Impacts	Comment	Risk Ranking
Land	Potential for soil contamination.	Procedures in place for excavation works. Investigate excavation works that expose underlying soils for potential contamination. Have an unexpected finds procedure in place. PIRMP in place for emergency situations. All operational areas are hardstands.	Low
	Disturbance of contaminated soils.	Procedures in place for excavation works. Investigate excavation works that expose underlying soils for potential contamination. Have an unexpected finds procedure in place.	Low
	Potential of acid sulphate soil disturbance.	Procedures in place for excavation works. Investigate excavation works that expose underlying soils for potential contamination. No known acid sulphate soils in the area.	Low
	Construction activities introducing contamination (i.e. construction vehicle & equipment movement and loading and unloading)	Procedures in place for excavation works. Investigate excavation works that expose underlying soils for potential contamination. Have an unexpected finds procedure in place. All new soils must meet VENM requirements. Regular inspections.	Low

Mitigation Measures to address Risk Assessment of Potential Land related Environmental Impacts

All works are to be conducted as per the LMP. All plant is to be inspected daily to ensure it is fit for use. All works are to include environmental safeguards where applicable. All works are to take into consideration prevailing and expected weather conditions. Works that have the potential to generate emissions must be planned to take into account weather conditions. Where applicable, mitigation measures will need to have been assessed and be ready to be put into use. Works areas and where material stockpiles are to be wetted down as required. Stockpiles are to be covered during adverse weather conditions. Work areas shall be opened up to allow the street sweeper access. All trucks are to have their loads covered.

Noise and Vibration

As the majority of the development involves the assembly of prefabricated equipment, noise and vibration emissions are expected to be minimal. There are no planned construction activities during the expansion that are known to be excessive in noise or vibration generation.

***Table 10**: Noise & Vibration Impacts of Construction Risk Assessment*

Issue	Potential Impacts	Comment	Risk Ranking
Noise & Vibration	Potential for increased noise activity.	Impact assessment has indicated that emissions will be within limits without further mitigation. Construction of a housing for the existing trammel screen will reduce noise from the primary source thus lowering emissions. Acoustic fences will be installed on the south, east and west boundaries which will also lower construction noise	Low
	Potential for offsite vibrations.	Impact assessment has indicated that emissions will be within limits without further mitigation. Footings for equipment that could cause vibrational issues are built to engineering specifications.	Low
	Construction works (i.e. loading and unloading)	It is anticipated that construction work noise will be within the approval limits for the normal operations. However, regular inspection of works and construction equipment will limit any potential environmental noise and vibration impacts and additional mitigation measures will be put in place for noisy construction activities.	Low

Mitigation Measures to address Risk Assessment of Potential Noise and Vibration related Environmental Impacts

All works are to be conducted as per the NMP attached in Appendix F. All plant is to be inspected daily and ensure it is fit for use. All works are to include environmental safeguards where applicable. All contractors are responsible for managing noise and vibration in accordance to their project specific plans. If there are activities to be undertaken that could potentially cause excessive noise or vibration issues, mitigation measures are to be assessed prior to the activity taking place.

Air quality

Given the previous use of the building its clean condition and its construction materials, fugitive emissions during the demolition phase are expected to be minimal. As the majority of the development involves the assembly of prefabricated equipment, fugitive emissions are expected to be minimal. There is a potential for fugitive emissions from earthworks.

***Table 11**: Air Quality Impacts of Construction Risk Assessment*

Issue	Potential Impacts	Comment	Risk Ranking
Air & Odour	Potential for dust emissions	Assessment has indicated no additional exceedance of criteria. New control equipment installed as part of the Development to make improvements over current standards. Floc to be relocated into an enclosed building.	Low
	Potential for odour emissions	Assessment has indicated no additional exceedance of criteria. New control and monitoring equipment installed as part of the Development to make improvements over current standards.	Low
	Potential for fugitive emissions	New mitigation and monitoring equipment installed as part of the Development to make improvements over current standards.	Low
	Construction works	No odourous goods expected to be utilised. Material stockpiles to be inspected and covered if required. Vehicles to cover loads and utilise wheel wash.	Low

Mitigation Measures to address Risk Assessment of Potential Air Quality related Environmental Impacts

All works are to be conducted as per the AQMP attached in appendix G. All plant is to be inspected daily and ensure it is fit for use. All works are to include environmental safeguards where applicable. All works are to take into consideration prevailing and expected weather conditions. Works that have the potential to generate fugitive dust emissions must be planned to take into account weather conditions. Where applicable, mitigation measures will need to have been assessed and be ready to be put into use. Work areas and material stockpiles are to be wetted down as required. Stockpiles are to be covered during adverse weather conditions. Work areas shall be opened up to allow street sweeper access where required. All trucks are to have their loads covered.

6. CONSTRUCTION

This section details the Construction Activities to be undertaken on site including the construction sequence stages, further detail about specific construction activities and the plant and equipment to be used and the construction environmental management practices and procedures being the mitigation measures and implementation.

This section consolidates the construction related parts of the

- Noise and Vibration Management Plan;
- Air Quality Management Plan;
- Landscape Management Plan; and
- Water Management Plan.

6.1 CONSTRUCTION ACTIVITIES AND STAGING

The activities to be undertaken on the site during construction and an indication of construction stages are detailed below. Please note that construction stages may overlap and alter due to weather conditions, availability of equipment and contractors.

No bulk earthworks are required as the development will reuse existing buildings, hardstand and the main services.

The building construction required is minimal and relates to the construction of Building L (which is effectively an acoustic lid over the top of the Trommel processing equipment) and Building K (which is the new office over the entry weighbridges). The below staging sequences include works classified as construction, services and equipment.

The below timeframes are indicative and dependent upon the Department Planning approval of the management plans which are required for the issue of the Construction Certificate.

Proposed Staging Sequence

Stage 1 *Site Establishment* *Construction Certificate + 2 weeks*

- Site Induction and Training (see section 4)
- Project Start up and Construction Meeting
- Project Scope of Works
- Confirmation of Roles and Responsibilities
- Review of Project Environmental Requirements including

- Identification of Construction related Environmental Risks
- Standard Construction Control Measures
- Adverse Risk Control Measures
- Monitoring Requirements
- Reporting Requirements

- Identification of Construction Personnel Office and Amenity Areas
- Traffic Management Protocols for the different construction stages
- Establishment and Installation of progressive erosion and sediment controls

Stage 2 *Dirty Water Transfer System* *Construction Certificate issued plus 10 weeks*

Required for clean water segregation

- Transfer of dirty water from 23 Tattersall Road to existing retention basin
- This is an EPA requirement currently underway

Stage 3 *Fencing, Driveways & Wheel Washes* *Construction Certificate issued plus 10 weeks*

Fencing is

- Required for site security and
- To limit construction noise and fugitive dust emissions as well as being an operational site mitigation measure

The fences required are

- Internal Car park and Security Fencing
- Southern Boundary Fence
- Eastern Boundary Fence and the
- Western Boundary Fence
- Wheel washes are required for dirt and dust control for construction vehicles and ultimately for daily operations
- Driveway and Car Park repairs and upgrades

Stage 4 *Demolition* *Construction Certificate issued plus 12 weeks*

- Internal Office Refurbishments
- External Demolition Scope including
  - Western Fence
  - Existing Office Block and
  - Portions of Warehouse/Sheds
- Specific Demolition Traffic management

Stage 5 *Services & Office Upgrades* *Construction Certificate issued plus 28 weeks*

Fire

- Fire Extinguishers
- Internal Warehouse Fire Sprinklers
- Internal Warehouse Brigade Fire Lines
- Internal Fire Hydrant Lines & Hose Reels
- Ring Main
- Pump Houses

Power Upgrades

- Existing Sub Station and Power Factor Upgrades

Office Upgrades

- Refurbishments, Amenities, Replacement of Air conditioning

Stage 6 *Entry weighbridges, Weighbridge Office (Building K) and Trommel Acoustic Lid (Building L)* *Construction Certificate issued plus 34 weeks*

- Entry Weighbridge Installation
- Weighbridge Office Installation
- Trommel Acoustic Lid Installation

Stage 7	*Equipment Installation*	*Construction Certificate issued plus 44 weeks*

The planning, purchase, installation and commissioning of equipment will include

- Relocation of Pre Shredder
- New Conveyor Systems
- Floc Treatment & Conveyor System
- Final Commissioning of New Shear
- Decommisioning of Old 800T shear
- Truck Wash and the
- Bailer

Stage 8	*Retention Basin Treatment Works*	*Construction Certificate issued plus 46 weeks*

Installation of a collection pit

- Installation of bunded area
- Installation of Water Treatment System
- Installation of storage tanks

Stage 9	*Landscaping & Finishing Works*	*Construction Certificate issued plus 46 weeks*

- Completion of the planting requirements under the approved Landscape Management Plan including
- Reuse of top soil and
- Planting approved species

Stage 10	*Finalisation of Construction Activities*	*Completion of Construction*

- Decommission Construction Facilities and Site Reinstatement

It should be noted that Fire Orders that have been issued by the Department of Planning will impact the above timing and take certain elements out of the Development Approval process.

6.2 CONSTRUCTION METHODOLOGY INCLUDING PLANT AND EQUIPMENT

This section addresses specific construction activities and details the construction plant and equipment to be used.

It is likely that some of the above stages will occur concurrently. Construction activities will take place in areas that will be construction zoned. Prior to works commencement, traffic controls and barricading will be put in place to ensure segregation between people and mobile plant and between work areas. In some instances, security fencing will be utilised.

All activities will be done on site so no road or footpath closures will be necessary.

6.2.1 Building Demolition

Existing services in the demolition zone are to be located, isolated and verified. All non-ferrous services are to be removed. A boom lift will be required for the removal of lights and cabling. Licenced contractors using two excavators will dismantle steel structures including roofing. All steel is to be recycled. Brickwork in the form of concrete blocks will be stored centrally on the concrete floor in readiness for contractor removal.

Should asbestos be detected during the demolition stage then the below process will be followed

- If asbestos is suspected then work will be ceased
- The suspected material will be tested by a NATA accredited lab
- If the test is negative then demolition will proceed
- If the test is positive then a licensed asbestos removalist contract or will be appointed to remove the asbestos
- The licensed asbestos removalist contractor will be required to comply with
    - Safe Work NSW - Code of Practice - How to safely remove asbestos - September 2017
    - Work Health and Safety Act 2011 and
    - Work Health and Safety Regulation 2011
- Upon receipt of all asbestos clearance certification the work will proceed

6.2.2 Weighbridge (outbound) Infrastructure

The weighbridge framework will be delivered to site via truck and lifted into place by a Franna. The framework will be assembled on site. Concrete delivery will by truck and pump truck and will pour in situ for the weighbridge and the ramps.

The tyre wash will be excavated and reinforcing works completed so concrete truck and pump truck can complete the pour. The concrete pour includes entry and exit ramps onto existing infrastructure. The vibration screen designed to help shake dirt off will be built and installed in-house with the use of a Leibherr excavator.

The existing bitumen driveway will be removed using excavators and replaced with a concrete driveway. Concrete will be supplied by trucks and transferred via a pump truck into steel reinforcing framework.

6.2.3 Acoustic Fencing

The structural engineer will require the installation of piers and footings for the fence posts. Concrete will be delivered by truck and pump truck and poured into a steel reinforced framework. Posts to be supplied in house and delivered from Newcastle and lifted by crane. Fence panelling will be done by external contractors with the use of a boom lift.

6.2.4 Shear

Concrete cutting and concrete removal will be required to allow for the required shear foundations and services. The structural engineer will require the installation of piers and extensive footings. Piers will be lifted and screwed into place by contractors using an excavator. Concrete trucks and a concrete pump truck will pour the concrete into the steel reinforcing framework.

Trench work for water and electricity supply will be actioned using an excavator. Trucks will deliver required materials such as sand and pipework.

6.2.5 Weighbridge (Inbound) and Offices (Building K)

The weighbridge framework will be delivered to site via truck and lifted into place by a Franna. The framework assembly will be on site. The concrete delivery will be by truck and pump truck and will pour in situ for the weighbridge and the ramps.

Once the weighbridges are installed, the elevated office will be constructed. The structural framework, offices and stairs will be designed offsite and will arrive in modular form. The framework will be installed, followed by the stairs and then the office will be lifted by crane and the final assembly take place. Once assembled the services will be connected.

6.2.6 Trommel Acoustic Lid (Building L)

The foundation pads will be installed on the existing concrete floor. Beams and legging braces will be delivered to site and assembled with the use of a crane. Once assembled boom lifts will be utilised to install the cross-bracing, supports and roof cladding.

6.2.7 Office demolition

Licenced contractors will use excavators to dismantle the upper section of the building with all steel being recycled. The lower section which are brickwork will be knocked over and the bricks taken from site. Then new concrete hardstand will be installed.

6.2.8 Bailer

Contractors will action the required excavation utilising an excavator and truck. Framing contractors will complete the steel reinforcing and then concrete trucks and a concrete pump truck will supply material for the base and then spray concrete onto the wall reinforcing the structure.

Footings and beams on which the bailer will be seated will be trucked in and put in place using a Franna. The conveyor will then be installed. It will arrive in sections and be assembled with boom lifts.

The bailer will also arrive in sections and will be installed and services connected before undergoing commissioning. Installation of some sections will require the use of a Franna.

6.2.9 Floc conveyor system

The conveyor system will be delivered in sections from the manufacturer and assembled on site with the assistance of cranes and boom lifts. The conveyor system feet will be bolted onto pads that will be attached to the existing concrete flooring.

6.2.10 Retention Basin

Works on the dam will consist of five stages;

Stage one will be the design and approval process.

Stage two will be the build of an improved collection course particulate system (Floc Pit). Contractors will modify the existing pit and driveway. Framing contractors will install the steel reinforcing and then concrete trucks and a concrete pump truck will supply material for the base and then spray concrete onto the wall reinforcing structure.

Stage three will be the build of a large bunded area to house two sludge collection bags. Framework, steel reinforcing and concreting works will all be arranged by the contractor. Collected water will be run from the bund into the retention pond via pipework. This will also be constructed by the contractor.

Stage four will be the installation of the tertiary water treatment system. This will be carried out by the supplier using onsite mobile plant.

Stage five will be the installation of a new tank/s to increase the sites storage capacity. Framework, steel reinforcing and concreting works will all be installed by a contractor. The tank manufacturer will supply and install the tanks associated services. A crane and boom lift will be required for the tanks' installation.

6.3 CONSTRUCTION ENVIRONMENTAL PRACTICES AND PROCEDURES

The main issues for construction activities that have been identified for site are;

- Vehicle material tracking;
- Vehicle loads;
- Construction traffic movement;
- Excavations;
- Material stockpiles
- Fugitive dust emissions; and
- Noise and Vibration generation.

The construction environmental practices and procedures are detailed in the mitigation and implementation measures which limit the impact of the Project construction activities on the environment.

The CEMP consolidates the construction mitigation and implementation measures that were included in the relevant construction related parts of the below management plans which are required as conditions of the Consent including the

- Noise and Vibration Management Plan
- Air Quality Management Plan
- Water Management Plan and
- Landscape Management Plan

The practices, procedures and measures that will be implemented to ensure all reasonable and feasible measures are employed to minimise any environmental impacts from construction activities include;

6.3.1 Construction Traffic Management

- The facility is fully sealed to minimise fugitive dust emissions from vehicular movement;
- A street sweeper will be utilised to clean site roadways and other areas on site, as required;
- All construction vehicles must enter and exit on the one way traffic site flow on 45 Tattersall Road. This will be segregated from the customer vehicle flow which will be kept on the 23 Tattersall Road site during construction.
- All construction vehicles must have their loads covered when entering or leaving site;
- All construction vehicles must leave the site via the tyre washer to ensure they are cleaned of dirt, sand and other materials to avoid tracking the materials on public roads;
- A truck wash area will be developed;
- Site speed limit is 10kmh: and
- All vehicles shall exit site via a wheel wash

6.3.2 Construction Noise & Vibration Management

6.3.2.1 Physical Barriers

Acoustic fences and walls will be;

- Inspected monthly by the Group Environment Manager with any identified failures, gaps or holes placed onto a maintenance report for rectification; and

- Rectifications shall be done using appropriate materials that do not diminish their acoustic qualities.

6.3.2.2 Construction Equipment Maintenance

The Project Manager is responsible to ensure all plant and equipment installed and used on site are maintained and operated in a proper and efficient condition.

6.3.2.3 Physical Barriers and Dust Screens

Acoustic fences and walls will be amongst the first construction stages to ensure construction activity noise impacts are limited.

These fences and screens will be

- Inspected monthly by the Group Environment Manager with any identified failures, gaps or holes placed onto a maintenance report for rectification;
- Rectifications shall be done using appropriate materials that do not diminish their acoustic qualities.

6.3.3 Construction Dust Management

6.3.3.1 Dust Screens and Fences

Acoustic fences, dust screens and walls will be amongst the first construction stages to ensure construction activity dust impacts are limited.

These fences and screens will be;

- Inspected monthly by the Group Environment Manager with any identified failures, gaps or holes placed onto a maintenance report for rectification;
- Repairs will be done using appropriate materials that do not diminish their acoustic qualities.

6.3.3.2 Loading and Unloading

<u>Loading</u>

Only expected material to be loaded will be excavated materials. As these are Wianamatta formation clays they will be highly bonded and will not dust while they remain in their natural moist state.

If loading of stockpiled material that has dried out is required, it shall be dampened down prior to loading.

All loads leaving site shall be covered prior to exiting.

Unloading

As natural materials loaded shall be damp there is minimal opportunity for fugitive dust generation. The following precautions shall be practiced for unloading of all materials;

- Verify unloading area is clean and safe for unloading to take place;
- No unloading during high wind conditions; and
- No unloading when dust monitors are in alarm mode;

6.3.3.3 Fugitive Emission Monitoring

Portable monitoring equipment is being installed to determine the sites and individual equipment and activities contribution to background dust levels. The monitoring for fugitive dust emissions is discussed in section 8.

If the 4 hour rolling average exceeds the 50µg/m^3 site criteria and it is confirmed against BOM measurements, operations, including construction activities, that cause fugitive emissions shall cease.

6.3.3.4 Stockpile Management

All construction stockpiles must be managed. Soil stockpiles will;

- meet the requirements of the sediment and erosion control procedure;
- be located in positions unlikely to receive surface water runoff;
- utilise sediment fences;
- not be located near a drain;
- work with the grounds natural contours; and
- be inspected regularly.

Proposed stockpile locations are indicated on the below extract of the site plan, and may change subject to operational and construction requirements. Construction workers on the site will be informed of the stockpile locations.

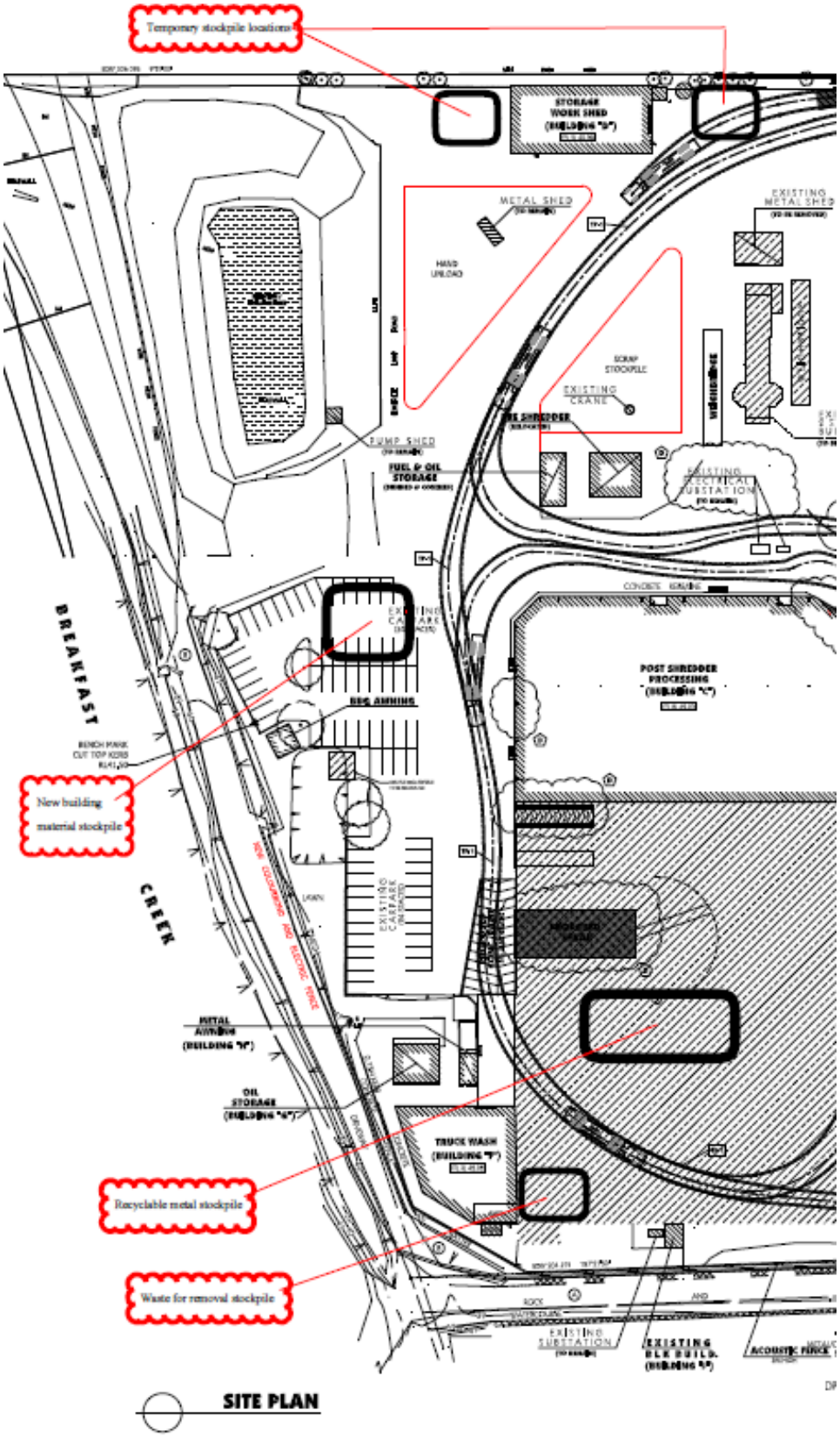

Figure 4: Stockpile Locations

Source: Sell & Parker

6.3.3.5 Sweeper

A street sweeper cleans site roadways on a set roster. Additional visits are organised when;

- daily inspections deem it necessary; or
- construction works are in progress.

6.3.4 Construction Water Management

6.3.4.1 Water

Water in the form of sprays, misters, hoses, or cannons is utilised on site for dust emission suppression. The type of water utilisation is dependent upon the process and prevailing conditions. The majority of use in construction activities will be with hoses.

6.3.5 Landscaping Management

The installation of the Landscaping will be in accordance with the plans and requirements in the Landscaping Management Plan.

6.3.6 Potential Construction Hazard Management

Construction & Operational Traffic Conflicts

This is most likely to be the main hazard given that the site will continue to run as an operational business during construction. Whilst the construction areas will be zoned and segregated from operational areas, should the entry/exit (delivery of construction supplies, plant and equipment) of construction and operational vehicles conflict then the operational vehicle will have first right and the construction vehicle will be delayed.

Weekly and daily operational scheduling will be discussed between the Project Manager and Site Manager to reduce conflicts through appropriate construction delivery scheduling.

General Construction Hazards Associated with Building Installation

The nature of the buildings to be constructed will require heavy plant and materials. The enforcement of Safe Work Methods and Risk Assessments will be required to ensure the safety of construction and operational personnel. The specific construction risks associated with higher risk constriction activities will be the subject of tool box talks conducted by the Project Manager.

Suspected Contaminated Materials

Any material that is suspected of being contaminated will be quarantined while confirmation of results is in progress. The material shall be segregated from normal operations. If it is confirmed to be contaminated it will be disposed of as per relevant regulations.

Site Emergency

Should there be a site emergency then the site evacuation plan will activated. The Emergency Site Evacuation Plans are attached in **Appendix J**. The evacuation process forms part of the site training.

6.3.7 Construction Soil Management

All surplus soils from excavations during construction, not reused on-site, shall be removed from site by covered trucks and disposed of at an appropriately licensed facility. It is expected that the minor excavations required will be related to the fire main trenches and will be able to be utilised on site in the southern landscaping areas at the rear of the site.

Whilst not anticipated, should any fill be required then it will only be VENM or ENM or other material approved in writing by the EPA.

Should any fill be required accurate records of the volume and type of fill will be kept. These records will be made available to the DP&E upon request.

7. CONSTRUCTION CONTROL MEASURES

The construction environmental control measures for site include;

7.1 BUILDING CODE

All construction will meet the requirements of the *Building Code of Australia (BCA) – Volume 1 – Class 2 to 9 Buildings (Commercial buildings)*.

This includes

- ensuring that the finished floor level of any new building is a minimum of 0.5 metres above the 1 in 100 year Average Recurrence Interval flood level;
- that any part of a new structure below the 1 in 100 year Average Recurrence Interval flood level is designed and constructed to be compliant with flooding; and
- any perimeter fence or wall does not restrict or impede the flow of overland flow

7.2 DEMOLITION STANDARD

All demolition will meet the requirements of *Australian Standard AS 2601.2001: The Demolition of Structures*.

7.3 EXCAVATION

All excavation works will meet the requirements of *Managing Urban Stormwater – Soils and Construction Vol. 1* (Landcom, 2004). Where imported fill material is required only VENM or ENM or other material approved in writing by the EPA will be used as fill on the site.

If excavation works are to be carried out in the vicinity of the existing detention basin, a detailed investigation shall be conducted and a contamination report generated. This report shall be provided to the Department on completion of the works to upgrade the detention basin.

The ERM Soil & Water Management Plan for excavations dated May 2016 attached in Appendix N, provides further detail on:

- Identification of potential contaminants that could be disturbed, mobilised and discharged to receiving waters;
- Procedures for testing, classifying, handling, storing and disposing of contaminated water, soils and or ground water encountered in excavations. Please note it is no longer proposed to excavate the detention basin and the Water Management Plan (**Appendix H**) details the proposed use of tanks; and
- Measures for periodically testing surface water runoff that may accumulate in excavations and procedures for off-site disposal.

7.4 FUGITIVE DUST

***Table 12**: Construction Emission Limits*

Pollutant	Unit of Measure	100 percentile limit	Averaging period
Fugitive dust	$\mu g/m^3$	50	4 hour rolling average

7.5 ENGINEERING CONTROLS

Sell & Parker have the following engineering controls designed to prevent the generation of emissions during construction activities.

7.5.1 Water Sprays

Various water spray dispensing systems are used on site. Uses include, but not limited to;

- Stockpile management;
- Road damping;
- Loading and unloading wetting;

7.5.2 Erosion and Sediment

Material handling will meet the requirements of *Managing Urban Stormwater – Soils and Construction Vol. 1* (Landcom, 2004).

7.5.3 Internal Roads

Other than landscaped areas the site is fully sealed. Carparks are in bitumen and areas that take truck traffic are in concrete. Sealed areas reduce fugitive dust emissions and are easier to maintain. These areas are inspected monthly by the Group Environment Manager to ensure they remain compliant.

7.6 TRANSPORT

Transport drivers are made aware of the need to minimise practices that have the potential to generate fugitive dust emissions through toolbox talks and LMS training. Information on site signage is available in Appendix E.

There is a site speed limit of 10kmh. This applies to all trucks, cars and mobile plant.

7.7 CONSTRUCTION

Contractors doing construction work will be briefed on site air quality obligations for their activities and material stockpiles.

7.8 ADMINISTRATIVE CONTROLS

The following administrative controls have been adopted on site for construction activities

Table 13: *Administrative Controls for Construction*

Administrative Control	Plan or Section
Contractors will undergo construction related training.	Section 4.0
Traffic Management	Section 6.3.1
Street Sweeper.	Section 6.3.3.5
Stockpile Management.	Section 6.3.3.4
Site Inspections.	Section 8.5
Complaints Handling Procedure	Section 10.0
Enforcement of Construction Environmental Management Plan by the Directors.	This plan

8. CONSTRUCTION MONITORING PROGRAM

8.1 WATER MONITORING

Relevant Monitoring Measures from the Water Management Plan that form part of the Construction Monitoring Program.

8.1.1 Retention Basin

The Group Environment Manager is responsible for inspecting the retention basin on a weekly basis. The checks are to monitor the physical state of the basin, the volume of water and to determine if there are any obvious water quality issues. The inspections will incorporate periodic pH testing and inspection of the treatment systems.

The Group Environment Manager is responsible for undertaking testing of the retention basin water in accordance with the site specific monitoring requirements. The outcomes of monitoring will be recorded in the water analysis spreadsheet. This spreadsheet provides the baseline data for the retention basin water quality.

8.1.2 Breakfast Creek

Sell & Parker do not have an EPL discharge point into Breakfast Creek. As controlled discharge has been changed from the original concept of utilising local waterways to utilising trade waste, a program for acquiring baseline data of receiving waters is no longer required. However, periodic testing will be conducted by the Group Environment Manager.

8.1.3 Storm Water

The Group Environment Manager is responsible for monitoring the effectiveness of all environmental measures in place to manage storm water quality. These measures are based on the ADW Johnson Stormwater Management Plan of July 2017 (**Appendix M**). This monitoring includes conducting a monthly inspection. Additional environmental monitoring will be undertaken if it is deemed required.

During the construction of the buildings, dirty and clean water (stormwater) will be separated and treated as per the ADW Johnson Stormwater Management Plans in **Appendix M**.

8.1.4 Inspections

Each month there is a formal site inspection conducted by the Group Environment Manager. The inspections, amongst other objectives, are designed to;

- Ensure all reasonable and feasible measures are employed to minimise water pollution;
- Ensure compliance with conditions of the consent;

- Ensure any construction works being carried out are in accordance with the Construction Environmental Management Plan; and
- Ensure the development operations are being carried out in accordance to the WMP.

This is achieved by inspecting the areas included but not limited to the following;

- Road surfaces for quality and dirt loading;
- Wheel wash for operational condition and sediment accumulation;
- Landscaped areas for runoff zones;
- Operational areas for poor housekeeping practices
- Retention Basin for water quality; and
- Drains for filter condition.

Results of the inspections are recorded and kept on file.

8.2 NOISE MANAGEMENT MONITORING

Relevant Monitoring Measures from the Noise & Vibration Management Plan that form part of the Construction Monitoring Program are detailed below;

8.2.1 Practical Noise Level Compliance Program

The air overpressure monitor functions during operational hours and logs the highest level recorded over a 15 minute period. If an overpressure exceedance of 120dB occurs, an SMS alert to management and a blast report of the event is automatically issued which triggers an investigation. The investigation will be conducted by the Group Environment Manager (GEM) and/or the Group Safety Manager (GSM).

The investigation will involve;

- Review of the air overpressure log;
- Discussions with site operators;
- Review of CCTV footage (if applicable);
- Equipment inspections (if applicable); and
- Documentation of the event in the overpressure log.

If the event is confirmed to be non-compliant the following actions are undertaken by the GEM);

- Cease operation for inspection of relevant equipment;
- Directors notified;
- Formal investigation; and
- Statutory authorities notified.

The investigation will encompass,

- Reinstatement or repair of equipment;
- If operator retraining is required;
- Procedural reviews; and
- Any other actions required to ensure ongoing compliance.

8.3 AIR QUALITY MANAGEMENT MONITORING

Relevant Monitoring Measures from the Air Quality Management Plan that form part of the Construction Monitoring Program are detailed below;

8.3.1 Overpressure

An airblast overpressure device is installed on the premise boundary. The device is programmed to be continuously operational during site working hours specified in consent condition B31. The device sends an SMS notification if the 120dB (Lineal Peak) limit is reached. The Group Environment Manager checks the data weekly to verify its operation and to ensure no overpressure incidents were missed. These weekly inspections and findings are documented in the overpressure log.

8.3.2 Meteorological station

A meteorological station as per EPL condition O3.5 will be utilised to monitor conditions to enable improved fugitive dust control.

8.3.3 Dust Monitors

Two new mobile dust monitors as per EPL condition M4 will be utilised to continuously monitor conditions during operational hours and assess site contribution to background fugitive dust levels. This automated system records incoming and outgoing fugitive dust levels therefore recording the sites or specific activity/equipment contribution to background levels.

Monitoring shall be done in conjunction with data supplied from the on-site meteorological station. This includes minimising fugitive emissions during adverse weather conditions. If weather conditions are likely to result in a heightened increase of fugitive emissions, activities will be assessed and where required rescheduled, reduced or ceased.

Records shall be kept for the testing of source emission points, they shall include the;

- Location of both monitors;
    - Upwind and downwind of activity/equipment being assessed.
- Duration of the test;
    - As required to determine contribution and/or prove mitigation strategies have reduced contribution.
    - In conducive weather and wind conditions, the test goal duration will be one hour.
- Frequency of testing.
    - Will be dependent upon the activity/equipment's contribution to the sites fugitive emissions. The greater the contribution the more frequent the testing.
    - Will be geared towards adverse weather conditions.

8.3.4 Inspections

Each month there is a formal site inspection conducted by the group environment manager. The inspections, amongst other objectives, are designed to;

- Ensure all reasonable and feasible measures are employed to minimise air emissions;
- Ensure compliance with conditions of the consent;
- Ensure any construction works are being carried out in accordance to the construction management plan; and
- Ensure the development operations are being carried out in accordance to the AQMP.

This is achieved by inspecting amongst other items;

- Road surfaces for quality and dirt loading;
- Stockpiles for fugitive emissions;
- Fences for gaps;
- Dust screens for perforations;

- Unloading for fugitive emissions;
- Oxy-cutting operations;
- Shear operations;
- Hammermill operations; and the
- Tyre wash

8.4 SOIL

Where VENM or ENM materials are utilised accurate records of the volume and type of soil shall be kept. These records will be made available to the DP&E upon request

8.5 GENERAL CONSTRUCTION ACTIVITY INSPECTIONS

As each construction activity commences there will be a site inspection conducted by the Group Environment Manager. The inspections, amongst other objectives, are designed to ensure;

- all reasonable and feasible measures are employed to minimise emissions;
- maintenance will be carried out as required and may be outside of operational hours
- compliance with conditions of the consent; and
- any construction works are being carried out in accordance to the construction environmental management plan

This is achieved by inspecting construction areas for;

- correct erosion and sediment control measures;
- correct storage of chemicals and excavation materials;
- water build up in excavations;
- unloading for fugitive emissions;
- truck loads being covered;
- any potential run off; and
- use of the tyre wash when exiting site.

Results of any issues from the inspections will be recorded and kept on file.

8.6 BASELINE DATA

While studies for emissions will be conducted on construction activities, the infrequent nature of consistent type of construction works means there will not be a baseline study purely for construction. Baseline studies will exist for the overall sites activities and construction activities will be incorporated into these studies.

9. ADVERSE ENVIRONMENTAL IMPACT PROTOCOL

The Group Environment Manager is responsible for criteria exceedance protocol checks.

Should there be a confirmed occurrence of an exceedance or a non-compliance due to a construction activity then the below corrective actions are initiated.

9.1 CORRECTIVE ACTIONS

When monitoring indicates that there has been a confirmed exceedance of operational criteria due to a construction activity, corrective actions shall be instigated. The corrective actions shall be the responsibility of Group Environment Manager; it is their task to ensure;

- That the source/s of the exceedance are determined;
- That the issue is promptly addressed;
- Contingency measures, if required, shall be determined and put in place, such as;
    - water sprays/misters;
    - portable dust screens;
    - collection or containment systems;
    - activity reduction; or
    - Activity cessation
- Directors are notified;
- If required, relevant regulating authorities will be notified;
- The issue will be detailed and its rectification documented for reporting purposes;
- An investigation report is completed; and
- An improvement process is implemented to ensure, where possible, the incident is not repeated.
- Where required operations are reduced or ceased as a result of the issue, legible records of the event shall be kept. These records are to include as a minimum;
    - date and time; and
    - activities reduced.
- Ceased Construction Activities shall not recommence until the issue has been resolved.

The Environment Department is responsible for:

- determining the source/s of the issue;
- improvement processes to mitigate against the issue reoccurring;
- logging the issue so it will be discussed in the yearly review;
- updating, where applicable, the relevant sections of the Blacktown Environment Management System (BEMS);
- providing feedback of the resolution process to a complainant, if applicable; and
- handling the event as per the exceedances process and the communication of the event as per the external audit process, when an exceedance is determined through an external audit.

9.2 INCIDENT MANAGEMENT

All incidents and near misses are documented and recorded by the Group Safety Manager. All issues with an environmental aspect are recorded by the Group Environment Manager in the environmental incident and near miss register. This data is presented during the yearly review. Negative trends will be investigated and root causes determined. Changes will be made to reduce determined root causes of incidents.

If an event or activity occurs that has, is likely to, or could potentially cause harm to the environment, whether that harm is on or off the premise, the emergency management procedure will be enacted as set out in section 9.3 below.

9.3 EMERGENCY MANAGEMENT

Environmental emergencies will enact the Pollution Incident Response Management Plan (PIRMP). The PIRMP has been updated to reflect the expansion of the facility. It is available on the Sell & Parker web site, www.sellparker.com.au under links and Environmental Reports. If the PIRMP is enacted then the EPA and DP&E will be informed as will other regulatory authorities as outlined in the plan.

9.4 INVESTIGATIONS

Environmental incidents and high potential near misses will be scrutinised by the Group Environment Manager to determine if an investigation is warranted. All proven exceedances will be investigated. When a formal environmental investigation is to be conducted, the Group Environment Manager will be the lead investigator. Investigations shall be conducted as per the investigations procedure.

9.5 REPORTING AND PUBLISHING OF RESULTS

All environmental statutory reporting will be conducted by the Group Environment Manager in consultation with management. Information will be issued after formal approval from a director. All information is available on the Sell & Parker website www.sellparker.com.au, as per Development Consent No. SSD 5041 condition C14.

10. COMPLAINTS

Complaints are handled as outlined in the complaints handling procedure, are documented on the complaints handling form and recorded on the complaints handling register. The complaints register is available on the Sell & Parker website, www.sellparker.com.au.

Sell & Parker have a complaints phone number (02 8212 9561) as advertised next to the exit gate at 45 Tattersall Road. Complaints can also be registered through the Sell & Parker website www.sellparker.com.au, or by telephoning the facility at 23-45 Tattersall Road, Kings Park on (02) 9621 2633.

Complaints regarding air quality require immediate investigation and shall be conducted in the following steps;

- Confirm wind direction at time of complaint. If wind direction and complainant directions are not aligned no further investigation shall be conducted.

If wind direction and complainant direction are in alignment or not known;

- Conduct interviews with pertinent staff
- Review available CCTV footage
- Review details supplied by complainant
- Review any other available sources of information
- Activate corrective actions (if required)
- Write report

Refer to the AQMP for further details.

The Noise Complaints Flowchart in Figure 4 below outlines how noise complaints shall be checked.

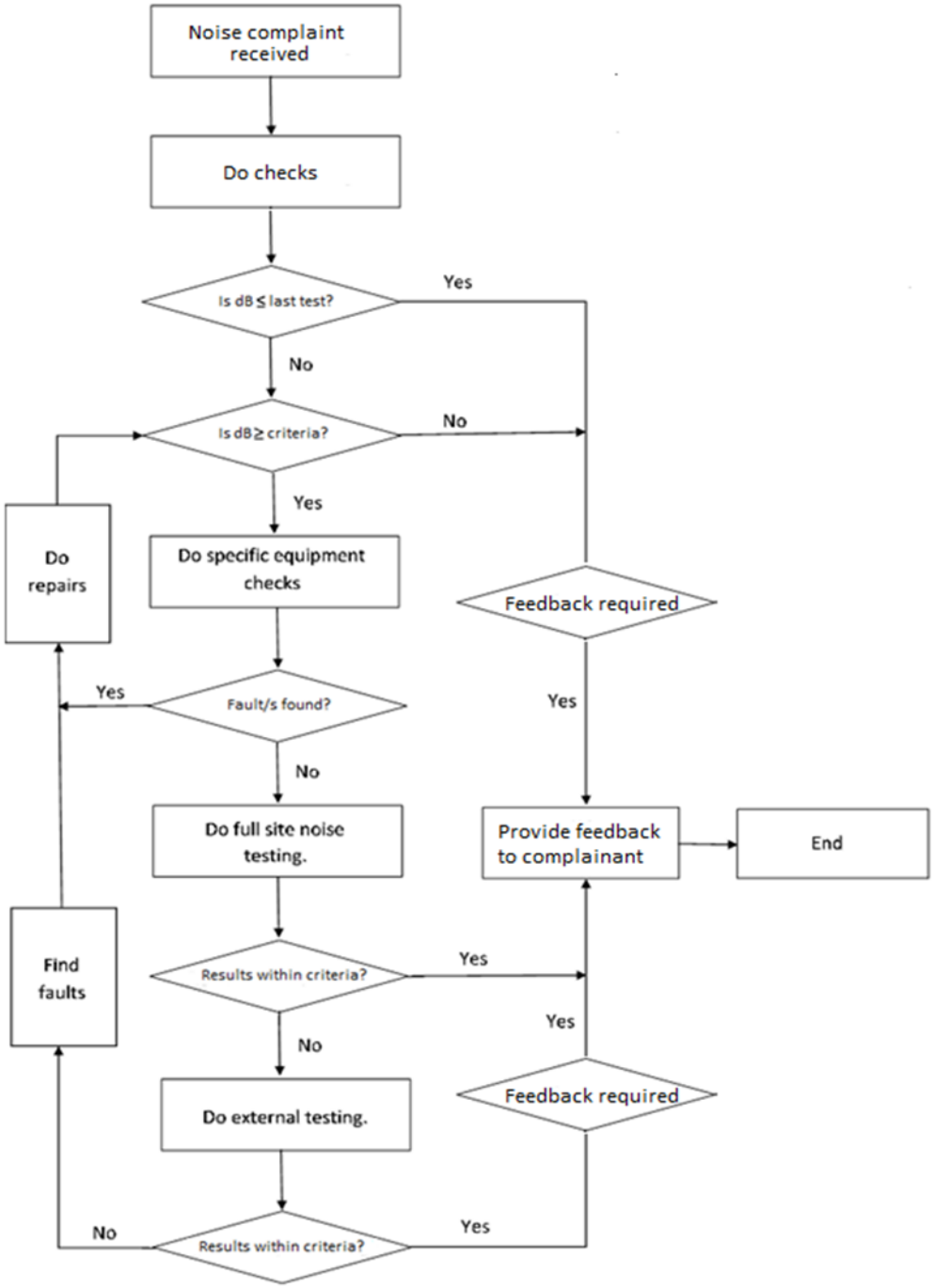

Figure 5: Noise Complaint Procedure Flowchart

Source: Sell & Parker

- A handheld noise meter shall be used to determine noise levels on specific equipment.
- If complainant direction is known, testing at nearest boundary point will be conducted.
- These readings shall be compared to previous readings to determine if levels have changed.
- If there has been a notable increase in noise levels in a particular area, specific equipment checks will be conducted.
- If faults are found they will be rectified.
- If after several checks the cause is unable to be determined, then contingency measures (section 9.1) shall be put in place.
- Discussions regarding works or changes to reduce the levels will be conducted.
- External testing against criteria will be conducted if issues can't be resolved.
- Testing is to meet criteria as specified in section 7.1.2.

Refer to the NMP at **Appendix F** for further details.

11. AUDITS

11.1 INTERNAL

Sell & Parker will conduct topic specific audits to validate that its systems are tracking and controlling environmental aspects that have a potential to cause non-conformances against its regulatory responsibilities. The Group Environment Manager shall be responsible for audits.

11.2 EXTERNAL

Sell & Parker as per Development Consent No. SSD 5041 condition C9, will conduct independent audits, conducted by a suitably qualified auditor, to assess the progress of the development against its consent conditions for the life of the consent. The auditor shall;

- be approved by the Secretary as per condition C9 (a) of the consent;
- meet condition C9 (b) of the consent; and
- audit against conditions C9 (c), (d), (e) and (f) of the consent.

The results of the audit will be presented to the Sell & Parker board and be available on the Sell & Parker website.

Within three months of commissioning the audit, a copy of the report with Sell & Parker responses to any recommendations made will be provided to the Secretary.

12. CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN REVIEW

As per condition C12 of Development Consent No. SSD 5041, a review of relevant sections of the BEMS will be instigated:

- when conducting an annual review;
- after an incident that results in regulator notification;
- when conducting an external third party audit; and
- when modifying the consent.

A yearly review of the development including the environmental performance of the operations shall be presented at a Board Meeting. Issues to be discussed in the meeting include, but are not limited to, the items listed in condition C11 of Development Consent No. SSD 5041.

As part of Sell & Parkers continuous improvement commitment, to ensure compliance now and in the future, the CEMP will be revised as required to incorporate measures, protocols or procedures to improve the environmental performance of the Development.

13. REVIEW OF PLANS

As per condition C13, the operation of the development will be "undertaken in accordance with all relevant updated and/or amended strategies, management plans and programs approved by the Secretary (or as revised and approved by the Secretary), unless otherwise agreed by the Secretary".

Should a modification to the original development consent be approved, the relevant management plan/s will be updated and sent to the Secretary for approval.

Rev. No	Rev. Date	Revision Description	Prepared by	Approved By	Signed
A	February 2017	New document	MH	CM	MH
B	March 2017	Respond to DP&E Comments	MH	CM	MH
C	July 2017	Revised Site Layout	MH	CM	MH
D	October 2017	Revised Site Layout S96 LEC	MH	CM	MH
E	March 2018	Revised Site Layout	MH	CM	MH

14. REFERENCES

Kings Park Metal Recycling Development Consent November 2015

https://majorprojects.affinitylive.com/public/3d00896d6ecd08883cd4e0f2afd6fcb1/02.%20Kings%20Park%20Metal%20Recycling%20Facility%20Consent%20Nov.pdf

Soil and Water Management Environmental Impact Statement March 2014

https://majorprojects.affinitylive.com/public/620b60f71334d0c9867c856c22559b42/Annex%20J_Soil%20&%20Water%20Management.pdf

APPENDIX A

Site Layout

APPENDIX B

Environmental Policy

APPENDIX C
Consent

APPENDIX C1

Mod 1

APPENDIX C2

Mod 2

APPENDIX D

EPA License

APPENDIX E

Truck Driver Sign and Sign Locations

APPENDIX F

Noise Management Plan

APPENDIX G

Air Quality Management Plan

APPENDIX H

Water Management Plan

APPENDIX I

Landscape Management Plan

APPENDIX J

Site Evacuation Plans

APPENDIX K

Risk Assessment Procedure

APPENDIX L

Renzo Tonin Noise & Vibration Impact Assessment

APPENDIX M

ADW Johnson Stormwater Management Report

APPENDIX N

ERM Soil & Water Management Plan for Excavations

APPENDIX O

Sydney Water Section 73 Certificate