

Construction Environmental Management Plan

Property:

WesTrac HQ Tomago

Stage 1

Proponent:

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1.0 Introduction

This Construction and Environmental Management Plan (CEMP) is for the construction of Stage 1 of the Tomago project. The Stage 1 development will be a WesTrac HQ. The CEMP addresses the specifics of the construction project. The approval requirements cover both the construction and WesTrac operations. Once operations commence it is expected that WesTrac's services company EMP will apply.

1.1 Background

The project received approval on August 2009. The project approval requires the proponent to prepare an Environmental Management Strategy and an Environmental Monitoring Plan, the statement of commitments provides for these documents to be the form of a Constructive Environmental Management Plan (CEMP).

Matters to be addressed by the CEMP are detailed in the approval and include incident reporting, complaints procedures, reporting and audits.

The CEMP has been prepared by ADWJohnson for the WesTrac HQ stage 1 development on behalf of WEPL Investments Pty Ltd.

The CEMP provides a system for addressing approval requirements and provides procedures to address and manage potential environmental impacts associated with the construction, commissioning and initial operations of stage 1 of the Tomago WesTrac HQ development.

The CEMP addresses the applicable requirements of:

The conditions of Project Approval (07_0086) issued by the Minister for Planning (refer Appendix A) and dated 7 August 2009.

The Statement of Commitments contained within the Project Environmental Assessment (EA) (refer Appendix A);

The project Environmental Assessment Report prepared by ADW Johnson Pty Ltd; and

The NSW Department of Planning Assessment Report for the Tomago Project.

The CEMP has been developed consistent with:

WesTrac Environmental Management System 2009;

AS/NZS ISO 14001:2004 - Environmental Management Systems – Requirements with Guidance for Use; and

AS/NZS ISO 14031:2004 - Environmental Management – Environmental Performance evaluation
-Guidelines

AS/NZS ISO 19011:2003 – Guidelines for quality and /or environmental management systems auditing

AS/NZS ISO 14004:2004 - Environmental Management Systems – Ggeneral guidelines on principles, systems and support techniques

Applicable New South Wales and Australian environmental legislation.

WEPL Investments Pty Ltd has responsibility, authority and accountability for Project construction and environmental issues on site. WesTrac has responsibility for site operations once these commence. This CEMP outlines the key steps to be taken by all site personnel including WEPL Investments Pty Ltd and contractors, to manage potential environmental hazards and risks associated with the Project construction and to effectively minimise the potential for adverse environmental impacts.

To limit the potential for environmental harm and regulatory non-compliance all WEPL Investments Pty Ltd and contractor personnel engaged on the Project will be required to comply with the requirements of this CEMP.

1.2 Project Description

The WesTrac Tomago project is located on the northern banks of the Hunter River off Tomago Rd in the Port Stephens Shire local government area.

The objective of the Project is to: develop an industrial subdivision and establish a WesTrac HQ.

Stage 1 of the project requires intial subdivision, relocation of services, site works and the establishment of the WesTrac HQ. Civil Works are scheduled to commence in 2010.

Construction hours Mon-Fri 7am to 6 pm, Sat 8am -1pm, Sun & Public Holidays -nil

Timing works will commence January 2010

1.3 Statutory context of CEMP

Redlake Enterprises Pty Ltd the site owner sought approval from the NSW Dept of Planning (DOP) to construct a WesTrac HQ and industrial subdivision at Tomago. Approval was sought under Part 3A of the NSW Environmental Planning and Assessment Act 1979, (EPA).

An approval has also been received under the Commonwealth Environment Protection and Biodiversity Conservation Act (EPBC).

To support the major project application, environmental assessment in accordance with the requirements under of Part 3A of the EPA was undertaken. The Minister for Planning approved the development application subject to conditions in the Project Approval.

The purpose of the CEMP is to provide a document that ensures that the environmental commitments, safeguards and mitigation measures specified in the Project Approval, and in the Project Statement of Commitments, are implemented and monitored. The approval requirements are listed in the tables below.

Table 1: Summary of Project Approval Environmental Management requirements

Condition No.	Condition summary	Allocation of responsibility for implementing conditions
Schedule 1 administrative conditions		
1	Minimise harm to the environment	Section 3 generally
2	Development in accordance with plans	Section 3 generally
3	Inconsistencies of documentation	Section 3 generally
4	Compliance with Director Generals requirements	Section 2.2
5	Lapsing of approval	Section 3.1.1
6	Compliance with BCA	Section 3.1.2
7	Demolition to AS 2601-2001	Section 3.1.2
8	Asbestos removal procedures	Section 3.1.2
9	Dilapidation report submitted to DoP prior to commencement	Section 3.1.2
10	Proponent to repair / pay for infrastructure damage/relocation	Section 3.1.1
11	Relocate 132kV powerline to EA requirements	Section 3.1.1
12	Maintenance of plant and equipment	Section 3.1.2
13	Progressively lodged management and monitoring plans	Section 3.1.2
14	Payment of contributions prior to issue of subdivision certificate	Section 3.1.2
15	Payment of Tomago road upgrading contributions or provision of works in kind prior to stage 1 operations commencing	Section 3.1.2
16	Prior to subdivision certificate for stages 2 & 3 payment of regional infrastructure contributions	Stage 2 & 3 CEMP
17	Approvals from service providers required prior to construction of utility works	Section 3.1.2

Schedule 2 – Specific environmental conditions		
1	Prior to commencement of Stages 2 & 3 layout revision to include conservation area	Stage 2 & 3 CEMP
2	Prior to commencement of stage 2 works preparation of Site Design Guidelines in consultation with DECC and Council	Stage 2 & 3 CEMP
3	Prior to commencement of stage 2 works transfer of the conservation area to DECC	Stage 2 & 3 CEMP
4	Civil works to be completed for each stage prior to issue of subdivision certificate	Section 3.1.2
5	Only virgin excavated natural materials and/or excavated natural material to be used as fill	Section 3.1.5
6	Compliance with s.120 PoEO Act	Section 3.1.4 Section 3.1.5
7	Bunded storage for chemicals, fuels and oils	Section 4.3.8
8	Prior to stage 1 preparation of soil and water management plan	completed
9	Site water balance model requirements	completed
10	Erosion and sediment control plan requirements	Completed
11	Acid sulphate soils management plan requirements	completed
12	Stormwater management scheme requirements	Completed
13	Groundwater management plan requirements	completed
14	Waste water management plan requirements	Completed
15	Prior to commencement of stage 1 provide road works and a Construction Traffic Management Plan	To be done by relevant contractor
16	Design of Tomago Rd intersection prior to construction of stage 1 buildings	Section 3.1.2
17	Tomago intersection design details	Section 3.1.2
18	Prior to commencement of stage 1 operations provide adequate road access traffic	Section 3.1.2
19	Prior to operation of stage 1 install street lighting on Tomago Rd	Section 3.1.2
20	Notification of oversized/overmass vehicle movements	Section 3.1.2 /4.3.6
21	Internal road network design to AS 2890	Section 3.1.2
22	All stage 1 vehicle accommodation to be provided on site, sufficient provision for traffic queuing on Tomago Rd	Section 3.1.2
23	Provision of bike parking and change room for stage 1	Section 3.1.2
24	Stage 2 and 3 road works requirements	Stage 2 & 3 CEMP

25	Construction and operating hours requirements	Section 3.1.2
26	Compliance with site noise limits criteria	Section 3.1.2 / 4.3.3
27	Compliance with Stage 1 noise limits criteria	Section 4.3.3
28	Provision of noise barrier details to DG prior to construction	Section 4.3.3
29	Noise audit within 6 months of commencement of stage 1 operations	Future operational EMP
30	Prior to stage 2 & 3 construction prepare noise verification study	Future operational EMP
31	Preparation of Aboriginal Heritage Management Plan, prior to stage 1	In progress –see sub plan at 4.3.9
32	Dust minimization requirement	Section 4.3.1
33	Construction dust controls	Section 4.3.1
34	Odour controls	Operational issue
35	Within 6 months of operations commencement prepare odour audit	Operational issue
36	Prior to commencement of construction revise the landscape management plan	Completed
37	Approval required for any changes or additions to proposed signage	Section 3.1.2
38	Installation of boundary fencing prior to commencement of stage 1	Section 3.1.2
39	Outdoor lighting to AS 4282	Section 3.1.2
40	Prepare Energy Efficiency plan for the project	Section 3.1.2
41	Correct classification of waste	Section 4.3.1.1
Schedule 3		
42	Environment Management strategy	This CEMP for construction
43	Incident reporting	Section 3.3
44	Annual reporting	Section 3.1.2 / 4.4
45	Preoperation compliance audit	Section 3.1.2
46	Compliance updates	Section 3.1.2

1.4 Environmental objectives and purpose of CEMP

The purpose of the CEMP is to provide a document that ensures that the environmental commitments, safeguards and mitigation measures specified in Schedules 2, 3 and 4 of the Project Approval, and in the EA Statement of Commitments, are implemented and monitored.

The objectives of the CEMP are to:

- Ensure all commitments made for construction of the project are met;
- Ensure all requirements of project approval are met;
- Manage the environmental hazards and risks associated with the Project;
- Minimise the potential for environmental harm;
- Provide a mechanism for communicating and implementing site environmental policy; and
- To provide a process for review and continual improvement of project environmental management.

More specific environmental objectives and targets are as set out in Section 4 in management sub-plans.

1.5 Environmental Policy

WEPL Pty Ltd will ensure that controls outlined in this CEMP are implemented and regularly monitored to ensure their effectiveness. Changes to the controls will be instigated if they are not achieving their objectives. The CEMP will be revised and refined as required to ensure it remains relevant to the Project and consistent with environmental regulatory requirements and conditions of approval.

The proposal will comply with WesTracs environmental policy as appropriate.

1.6 Site and local sensitivities

The site location provides a number of environmental sensitivities through potential conflicts with adjoining land use.

The site adjoins land owned by the NSW National Parks and Wildlife Service (NPWS). Within this NPWS land is a RAMSAR wetland which is an internationally protected area for migratory shore birds. Potential sensitivities are site stormwater runoff, sedimentation and disturbance from lights.

A section of the site is located over the Tomago sand beds which are part of the regional water supply.

There are adjoining dwellings. The dwellings are potentially sensitive to noise, dust and odour.

1.7 Key Environmental Condition Indicators (ECIs).

To address the environmental performance of the Stage 1 project the following key indicators will provide an overall guide to the ongoing adequacy of site management.

Table 2: Key Indicators

Key Sensitivity	Key indicators Construction	Key indicators WesTrac operations
Adjoining dwellings	Noise	Noise
	Lighting	Lighting
	Dust	Odour
	Complaints	Complaints
Adjoining wetlands	Stormwater volume & discharge	Stormwater volume & discharge
	Stormwater quality	Stormwater quality
	Vegetation condition	Vegetation condition
	Sedimentation	Sedimentation
Site water management & detention basin	Discharge quality (chemical)	Discharge quality (chemical and microbiological)
Public health	Ponded water	Vector (mosquito) management
Tomago Sand Beds (onsite)	Ground water level	Ground water level
	Ground water quality	Ground water quality
Site generally	C& EMP construction non conformances	C& EMP operations non conformances

2.0 Planning and Legislative Requirements

The statutory requirements considered by this CEMP are those specified through the Project Approval and the Statement of Commitments. Requirements determined under the Project Approval are listed Section.

2.1. Project Approval

The Project Approval reflects a range of NSW legislative requirements applied via the assessment procedures of Part 3A of the EPA Act 1979.

In addition to the EP&A Act, potential licences and approvals under other relevant environmental legislation potential may be required for the Project. The potential licensing and approval requirements were determined as part of the EA and are listed in tables 3, 4 and 5. The project approval and statement of commitments is

2.2 CEMP Approval Requirements

The CEMP must receive the Director-General's approval before construction commences.

In addition to preparing the CEMP, the Project Approval also specifies consultation and other approvals that must be sought in relation to the Project construction, and that must be obtained prior to operation of the site.

Table 3: Consultation and Approvals required Prior to Construction

Regulatory Authority	Project Approval Reference	Approval / Consultation	Responsibility of
One month prior to the commencement of construction			
NSW Department of Planning		The CEMP shall be submitted for the approval of the Director-General no later than one month prior to the commencement of any construction works associated with the project, or within such period otherwise agreed by the Director-General. Construction works shall not commence until written approval has been received from the Director-General.	WEPL

Council and the RTA		A Traffic Management Protocol to outline management of traffic conflicts that may be generated during construction of the Project. The Plan shall address the requirements of Council and the Roads and Traffic Authority. Etc..	A traffic management sub plan forms part of this CEMP.
One month prior to the commencement of site preparation works			
Department of Planning	5.2 (b)	The Acid Sulfate Soil Management Plan, should such a Plan be required, shall be submitted for the approval of the Director-General no later than one month prior to the commencement of site preparation works, or within such period otherwise agreed by the Director-General.	Completed.

Table 4: Tomago Project Approval Environmental Management Requirements

Approval ref	Requirement	responsibility
Cond/Sched	General & ongoing	
1/2	Minimise harm to the environment	WEPL
2/2	Development in accordance with plans	WEPL PCA
3/3	Inconsistencies of documentation	WEPL
4/2	Compliance with Director Generals requirements	WEPL
5/2	Lapsing of approval	WEPL
10/2	Proponent to repair / pay for infrastructure damage/relocation	WEPL
12/2	Maintenance of plant and equipment	Site manager/ Contractors
5/3	Only virgin excavated natural materials and/or excavated natural material to be used as fill	Contractor
6/3	Compliance with s.120 PoEO Act (water pollution)	
7/3	Bunded storage for chemicals, fuels and oils	WEPL
20/3	Notification of oversized/overmass vehicle movements	WEPL
32/3	Dust minimization requirement	WEPL
33/3	Construction dust controls	Site manager Contractors
34/3	Odour controls	WEPL
37/3	Approval required for any changes or additions to proposed signage	WEPL

41/3	Correct classification of waste	WEPL
43/4	Incident reporting requirements	WEPL
44/4	Annual reporting requirements	WEPL
45/4	Prior to commencement of operation submit work as executed plans to DG	WEPL
46/4	Compliance updates to be provided on request of DG	WEPL

During stage 1 works		
6/2	Compliance with BCA	PCA
7/2	Demolition to AS 2601-2001	contractor
8/2	Asbestos removal procedures	Contractor
24/3	Stage 2 and 3 road works requirements	contractor
25/3	Construction and operating hours requirements	WEPL
26/3	Compliance with site noise limits criteria	WEPL /contractor
27/3	Compliance with Stage 1 noise limits criteria	WEPL /contractor
28/3	Provision of noise barrier details to DG prior to construction	WEPL /contractor
39/3	Outdoor lighting to AS 4282	WEPL /contractor
8.4 /soc	Erect 3.5 m high acoustic barrier along part of the eastern boundary	WEPL /contractor

Pre stage 1 operations		
15/2	Payment of Tomago road upgrading contributions or provision of works in kind prior to stage 1 operations commencing	WEPL
22/2	All stage 1 vehicle accommodation to be provided on site, sufficient provision for traffic queuing on Tomago Rd	WEPL
23/2	Provision of bike parking and change room for stage 1	WEPL/WESTRAC

During stage 1 operations		
29	Noise audit within 6 months of commencement of stage 1 operations	WESTRAC
35	Within 6 months of operations commencement prepare odour audit	WesTrac

Pre works stages 2 & 3		
1	Prior to commencement of Stages 2 & 3 layout revision to include conservation area	WEPL
2	Prior to commencement of stage 2 works preparation of Site Design Guidelines in consultation with DECC and Council	WEPL
3	Prior to commencement of stage 2 works transfer of the conservation area to DECC	WEPL
4	Civil works to be completed for each stage prior to issue of subdivision certificate	WEPL
24	Stage 2 and 3 road works requirements	WEPL

Pre stage 2 & 3 subdivision certificate release		
14	Payment of Council contributions prior to issue of subdivision certificate	WEPL

16	Prior to subdivision certificate for stages 2 & 3 payment of regional infrastructure contributions	WEPL
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2.3 Potential Licensing and Other Approvals

In relation to other legislation, a summary of the potential licensing and approval requirements for the Project was determined as part of the Project EA. The summary is provided below at

Table 5: Summary of Potential Licensing and Approval Requirements (from Project EA)

Legislative and Responsible Agency	Relevant Provisions	Requirements to Gain Approval
Dangerous Goods Act 1975 NSW WorkCover Authority	This Act regulates dangerous goods in NSW by requiring the various activities, such as the keeping, conveyance, use and manufacture of certain dangerous goods to be licensed by WorkCover. ty works.	A licence would be required for the storage of greater than 250 litres of a dangerous good (fuel or oil) and construction of a pipeline less than 10 km in length.
Roads Act 1993 NSW Roads and Traffic Authority	Consent is required from the Roads and Traffic Authority for work in, on, under or over a public road.	Closure of roads for transport of large plant items would require Roads and Traffic Authority consent under the Act.

3.0 Environmental Management

3.1 Management Structure and Responsibility

WEPL Investments consider the care for the environment an integral part of conducting business operations.

Figure 1 outlines the structure of responsibility of key positions in relation to environmental management. Responsibilities (including reporting responsibilities) of each key position on the Tomago Project site are outlined below.

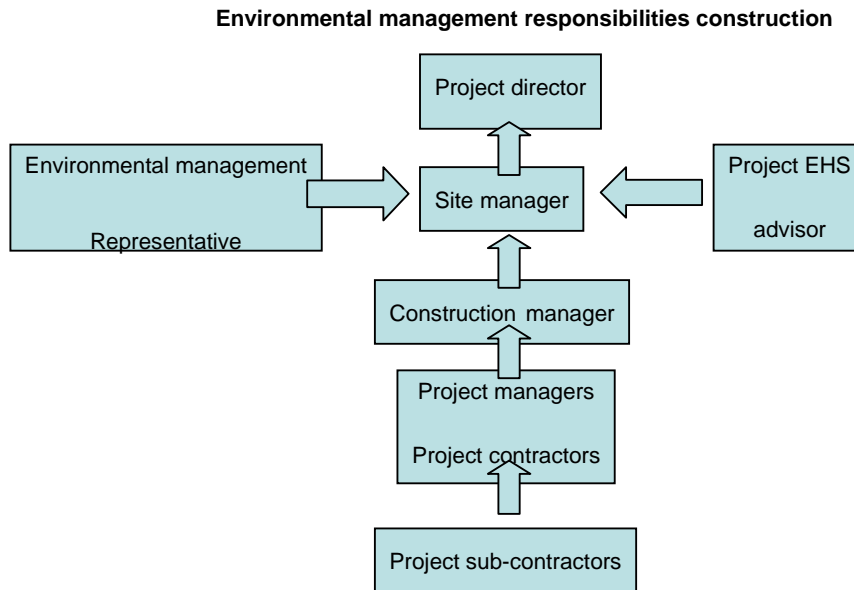


Figure 1: Structure of Environmental Responsibility

3.1.1 The Project Director

The Project Director has overall responsibility and accountability for environmental performance on the Project. The Project Director is responsible for ensuring consistency with the relevant legislative standards of Australia, WEPL Corporate Standards and contractual obligations, and the provision of appropriate resources to ensure the effective implementation of this CEMP.

3.1.2 Site Manager

Reporting to the Project Director, the Site Manager is wholly accountable for the construction project team and contractors in respect to environmental performance on site through:

- Monitoring compliance with applicable environmental aspects of:
 - Federal, State, and Local Government regulations;
 - Project specific development and approval guidelines including those of the Client;

- Ensuring the implementation, monitoring, review, and updating of the requirements of this CEMP;
- Ensuring all site personnel receive induction training that introduces the CEMP and appropriate ongoing environmental awareness training is provided;
- Ensure all site work is managed to fully comply with this CEMP and that each contractor effectively manages specific environmental risks or exposures in areas under their control;
- Ensure that communication and reporting systems are established and maintained for implementation of the CEMP;
- Ensure that the resources are available to effectively discharge responsibilities allocated under this CEMP;
- Ensure that complaints are managed in accordance with this CEMP; and
- Actively participate in auditing of the environmental performance of site contractors under this CEMP.

3.1.3 EHS Advisor

The Project EHS (Environmental Health and Safety) Advisor reports to the Site Manager. The EHS Advisor performs a key role in the implementation, maintenance, and monitoring of compliance to this CEMP. The responsibilities of this position include:

- Conducting the initial assessment of environmental aspects and impact analysis under this CEMP;
- Liaising with regulatory authorities;
- Providing specialist environmental advice and guidance to the Project Management Team and contractors as required;
- Auditing and ongoing monitoring of environmental performance and identifying activities with potential environmental impacts which have not been adequately covered by the CEMP,
- Advising the Project Site Manager and contractors of any potential risks and where necessary, issuing of noncompliance notices and /or revising this CEMP or the relevant contractor CEMP;
- Reviewing contractor CEMPs;
- Conducting routine scheduled field inspections and audits of construction activities on site in order to assess compliance with this CEMP, approval conditions, and relevant Federal, State, and Local Government environmental regulations;
- Ensuring the Project Site Manager is informed in a timely manner of all non-conformities and environmental incidents;
- Participating in environmental incident investigations and assisting in the development and implementation of corrective/preventative actions;
- The maintenance of appropriate EMS records including copies of applicable current legislation, permits, approvals and licenses, audit and incident reports, and weekly /monthly Project

environmental field inspection and progress reports measuring actual performance against stated objectives;

- Conduct and /or organise environmental monitoring as required;
- Conducting environmental inductions and developing and implementing ongoing environmental awareness training programs and records; and
- To maintain an environmental complaints register and to ensure all complaints are investigated and recorded in accordance with this CEMP.

3.1.4 Construction Managers (Civil /Mechanical & Electrical)

The project Construction Managers reporting to the Site Manager have direct day to day responsibility for managing the activities of contractors under their control and for monitoring and ensuring compliance by contractors with the relevant environmental guidelines established for the Project. These responsibilities include:

- Ensuring contractors submit CEMP's appropriately covering the regulations and environmental aspects, impacts and control strategies associated with their particular scope of work;
- Ensuring contractors develop and implement environmental surveillance and audit programs under this monitor compliance with this CEMP and relevant legislation;
- Ensuring that all Contractor personnel under their control are aware of their responsibilities for employee induction and awareness training including their environmental responsibilities, environmental concerns and the control measures applying to their scope of work;
- Conducting routine monitoring of environmental performance and compliance with the Project and contractors CEMPs and, when requested, assist the Project EHS Advisor to conduct scheduled environmental audits
- Ensuring any required corrective or preventative actions are implemented and completed as required;
- Ensure that the weekly and monthly CEMP reports and checklists from each Contractor are completed to schedule and reviewed for accuracy prior to signing off and forwarding to the Project EHS Advisor;
- Ensure that all environmental incidents, issues, or concerns are reported immediately to the Project EHS Advisor and that appropriate and timely action is taken;
- Ensure that all documentation required by this CEMP is complete and timely;
- Ensure that all environmental complaints are handled in a prompt and courteous manner and in accordance with the procedures of this CEMP.

3.1.5 Project Contractors /Project Managers

All site contractors and their subcontractors are to fulfil their environmental responsibilities for the Project in particular:

- The submission of a CEMP for their work which complies with Federal, State, and Local Authority regulations, the contents of this Project CEMP,
- Nomination of an environmental representative for their work area prior to commencing on site;
- The preparing and implementing of specific environmental control plans as deemed necessary by the Site Manager or his nominee to correct identified deficiencies or to enhance overall environmental performance and compliance of the Project;
- Taking all necessary precautions and actions for activities conducted on the Project with the potential to cause environmental harm ;
- Complying with this Project CEMP and relevant regulations including the development and implementation of an environmental monitoring program;
- Providing environmental awareness training including induction training for all new employees detailing each persons individual environmental responsibilities, key aspects of the Project CEMP and matters specific to their individual work scope on the Project;
- The immediate verbal reporting to the responsible Site Manager – or in their absence, the Project EHS Advisor, of all environmental incidents, non-conformances, or concerns;
- The timely implementation of corrective actions or remediation strategies to control or ameliorate the extent of environmental harm;
- The submission of environmental incident reports and weekly /monthly inspection and compliance reports to the Site Manager – or in their absence, the Project EHS Advisor, in a timely manner to assist in the compilation of the weekly /monthly EHS reports; and
- Ensure that all environmental complaints are handled in a prompt and courteous manner and in compliance with the guidelines contained in this CEMP.

3.1.6 Environmental Management Representative

The Environmental Management Representative (EMR) provides independent auditing and advice to ensure environmental compliance of the Project with legislative requirements.

The EMR will have responsibility for:

- Considering and advising on matters specified within the Project Approval and Statement of Commitments and compliance with these matters;
- Certifying all site activities not specified in the project approval and not constituting construction as likely to be of minor environmental and/or community impacts or ensure that such activities receive appropriate approval prior to commencement;
- Periodically monitoring project environmental activities to evaluate the implementation, effectiveness and level of compliance of on-site construction activities with the CEMP and associated plans and procedures, including carrying out site inspections at least fortnightly;

- Recording and providing a written report to the Site Manager on non-conformances with the CEMP and the requirements of WEPL/WesTrac for undertaking environmental mitigation measures including identification of required changes to the CEMP;
- Directing project managers, contractors and subcontractors to stop work immediately if in the view of the EMR an unacceptable environmental impact is occurring or is likely to occur, or
- require other reasonable steps to be taken to avoid or minimise any adverse impacts;
- Reviewing corrective and preventative actions to ensure the adequate implementation of recommendations from audits and site inspections.
- Reviewing the CEMP;
- Certifying that minor revisions to the CEMP are consistent with the approved CEMP; and
- Providing regular (or as required by the Director-General of Planning) reports to the Director-General on matters relevant to carrying out the EMR role, including the notification of any stop work recommendations.
- The EMR will immediately advise WEPL/WesTrac and the Director-General of any incidents relevant to the Project Approval and Statement of Commitments resulting from construction that are not dealt with expediently or adequately.

3.2 Environmental Awareness Training

Project Managers and Project Contractors shall be responsible for ensuring that all Project personnel under their control receive both initial and ongoing environmental awareness training to ensure they are familiar with their environmental responsibilities under the Project CEMP.

Project induction will provide all new site employees with an overview of the Project environmental management system and key aspects of the Project CEMP prior to allowing access to the worksite.

In addition, each individual contractor shall be required to provide all new employees with environmental induction training which addresses their own CEMP and which at a minimum details:

- Individual responsibilities under the plan;
- Risk management strategies for assessing potential environmental impacts and for developing appropriate management or control strategies for any activity perceived to pose an environmental risk;
- Key environmental concerns and associated control strategies;
- How hazardous or dangerous goods will be handled;
- Waste minimisation, recycling, and disposal guidelines;
- Incident and emergency response actions including reporting and recording guidelines; and
- Complaint handling procedures.

The Induction Training program will be provided to the Environmental Management Representative for adequacy review prior to inductions taking place.

Project managers, contractors, the EHS Advisor and environmental representative shall conduct ongoing environmental awareness training for key issues throughout the Project through the use of targeted presentations at daily job pre-starts, toolbox meetings etc., and the use of targeted literature.

Project managers and contractors shall maintain a register of all environmental training provided which records the nature of the training, dates, the names of persons trained, and trainer details as well as any refresher training that may be required.

3.3 Emergency Contacts and Response

Table 6 outlines the contact personal and their details for emergency responses in relation to environmental management on the Tomago site.

Table 6: Environmental Responsibility Contacts **(TO BE COMPLETED BY WEPL)**

Role	Contact	Business Address	Telephone Contact
Project Director			
Site Manager			
EHS Advisor			
Civil Construction Manager			
Mechanical Construction Manager			
Electrical Construction Manager			
Environmental Management Representative			

WEPL have developed an Environmental Emergency Preparedness and Response Management Plan to minimise the potential for incidents to occur on site and to provide an effective and rapid response to control the incident. The Plan is provided at Appendix D.

3.4 Community Consultation and Notification Strategy

The following section details the Community Consultation and Notification Strategy for the Project. It outlines communication mechanisms that will be used in matters of environmental concern.

3.4.1 External Stakeholders and Community Consultation

The project included community consultation as part of the project approval. The consultation assisted in identifying the necessary mitigation and management measures.

Prior to the commencement of construction, a Community Consultation Consultant will be engaged to undertake consultation (on behalf of WEPL / WesTrac) with Council and the local community including affected landowners.

The Consultant will inform adjacent property owners of proposed mitigation measures, assess any matters raised by owners and manage any further owner land owner involvement in determining how mitigation measures will be managed. Land owners will be provided with feedback on any matters raised by them.

3.4.2 Public Availability of Documents

Subject to the Privacy and Personal Information Act, approvals and licensing documents will be made available for public inspection on request.

This CEMP will be a public document. Hard copies will be made available to adjoining land owners. The CEMP and will be publicised through local newspaper advertisements and via the website (refer Sections below). The document will be able to be viewed electronically through the website.

3.4.3 Advertisement of Forthcoming Works

Prior to the commencement of construction, and at three monthly intervals thereafter, the Consultant will place advertisements in relevant local newspapers detailing the nature of forthcoming works, the location of the forthcoming work and the hours of operation. All advertisements will include reference to a 24 hour toll free complaints telephone number and an address for the Activity Internet Site (refer Section 3.4.4). Where relevant, advertisements will also include details of:

Any traffic disruptions or controls or changes to property access; and

Any irregular work practices such as the use of helicopters.

3.4.4 Project Internet Site

An internet site will be established to provide a readily accessible contact point. The site will include information regarding progress of works and planned work schedules.

The internet site will be established by the Consultant prior to the commencement of construction, and will be maintained for a period of 12 months after the commencement of site operations.

The Internet site will contain the following information:

Links to approvals and license documents;

A description of relevant approval authorities and their areas of responsibility;

A list of publicly available reports and plans and details of how they can be accessed or where possible links to access them;

Contact names and phone numbers of relevant communications staff;

Information on how to make a complaint including a postal address for receipt of written complaints, the 24 hour toll free complaints telephone number and an email address for making complaints;

Current work and construction activity progress updates; and

Planned work schedules (where significant changes in noise or traffic impacts are expected).

3.4.5 Construction Complaints Management

The details of the complaints management process will be made publicly available prior to commencement of construction.

A 24 hour toll free telephone number and email address for public complaints will be created by WEPL/WesTrac. A sign will be erected near the entrance to the site displaying postal and email addresses and the 24hr toll free telephone number for complaints. The contact information will also be available on the website.

The Site Manager will maintain a register of complaints. Details of all complaints from the community or stake holders regarding any construction or commissioning activities conducted on site as well as details of any investigations or actions that result from the complaint being made, will be recorded on the Environmental Complaints Form provided at Appendix E.

The procedure for handling complaints is detailed below in Table 7.

Table 7: Environmental Complaints Management Procedure

Environmental Complaints Management Procedure

Performance Objective: To ensure that a timely and appropriate response is made to public complaints.

Performance Criteria:

- All complaints registered.
- All complaints responded to promptly and followed up with appropriate investigation and documentation by the responsible person.

Responsible Person:	<ul style="list-style-type: none"> • The EHS Advisor – or in the Advisor’s absence the Site Manager - is responsible for receiving, registering, investigating and documenting all complaints.
Implementation Strategy/ Mitigation Measures	<ul style="list-style-type: none"> • The details of all complaints received (by phone, email, in writing or in person) shall be registered on an Environmental Complaints Form provided at Appendix E. • The EHS Advisor shall – wherever possible, receive and register all complaints. In the Advisor’s absence, all complaints shall be directed to the Site Manager or the Site Manager’s nominee. In the absence of both parties, the person registering the complaint is to take and document full details of the complaint in accordance with the Environmental Complaints Form and notify the EHS Advisor or Site Manager immediately. • Each complaint is to be investigated promptly by the EHS Advisor or nominee, and a response made to the complainant within two hours if during night-time works, and within 24 hours at any other time. An interim response advising that investigations are continuing is acceptable. A formal written response to the complainant within 10 days will be made if the complaint has not been resolved through earlier contact. • Mediation procedures will be instigated where the complaint is unable to be resolved. • The EHS Advisor shall ensure that the details of the investigations and any follow up actions (or justification for no action) are recorded within the Environmental Complaints Form in respect of each complaint. • The Site Manager or Project Director shall provide verbal notification of complaints to WEPL/WesTrac as soon as possible following receipt of the complaint. A copy of the written complaint will be forwarded to WEPL/WesTrac as soon as practicable (within 24 hours).
Monitoring	<ul style="list-style-type: none"> • Targeted monitoring is dependant on the nature of the complaint. • Monitoring is to be established prior to and continue during construction to provide base lines in relation to noise, dust and water quality through arrangements with local Environmental Consultants conducting relevant monitoring and /or sampling.
Reporting	<ul style="list-style-type: none"> • The Project EHS Advisor shall report all complaints to the Site Manager. • The Site Manager is responsible for reporting complaint details to WEPL/WesTrac and /or the EPA /Local Authority/DoP in accordance with permit /license conditions. • Information regarding all complaints received (including the means by which the complaint was addressed and whether resolution was reached) will be reported in the Construction Compliance Report.

Corrective Actions: • Following the investigation, a non-conformance report (NCR) is to be issued to any party whose actions or omissions which gave rise to the complaint have been proven to be outside of the guidelines of this CEMP or EPA /permit /licensing conditions or guidelines.

• In the event CEMP or regulatory guidelines were not breached, the EHS Advisor, Project Manager or the respective Contractor Manager /representative are to investigate how work practices may be modified to lesson perceived or actual environmental impact.

Identification of Failure to Comply with Procedure:

The following constitute examples of incidents or failure to comply in relation to the management of environmental complaints:

- Insufficient information recorded on the Environmental Complaints Form;
- Failure to submit the Environmental Complaints Form as soon as practical following the receipt of the complaint;
- Complaints not documented or reported, and/or record not maintained;
- Failure to implement corrective actions.

Corrective Actions:

Should an incident of failure to comply occur in relation to the management of environmental complaints one or more of the following corrective actions will be undertaken as appropriate:

- Conduct additional training of staff regarding complaint management;
- Review procedure in light of shortfall.

3.4.6 Communication with Media

Only the Site Manager and Project Director are authorized to respond to enquiries from the media whether radio, print or television, etc.

Site contacts for the media will be displayed on the website.

All media enquiries will be notified immediately to the Site Manager (or in the Site Manager's absence, the Project Director), who shall notify WEPL. WEPL will manage all subsequent media communication.

4.0 Implementation

4.1 Environmental Impacts

The areas of concern for the project have been identified through the Environmental Assessment and approval processes.

The approval specifies all areas of concern and some specific indicators. The main principle for managing environmental performance is the identification of environmental performance indicators (EPIs) that are appropriate for the site and the nature of the operation.

EPIs are chosen on the basis of environmental aspects that can be controlled or influenced through management, relevant environmental performance criteria and the views of interested parties.

Generally, the matters addressed in the environmental management sub plans in this section address:

- The scale and nature of the proposed operations;
- Emissions;
- Risks;
- The condition of the environment;
- The possibility of incidents; and
- The applicable legal and regulatory requirements.
- The sub plans identify environmental objectives, environmental targets and EPIs for the proposal.

Table 8: Potentially Significant Environmental Impacts

Project Activity	Environmental Aspects	Environmental Aspects
Excavation & Earthworks	Initial clearing and site preparation	<p>Site previously cleared for agriculture so minimal impact on natural features is expected.</p> <p>Adjoining wetland areas may contain significant habitat, flora, and fauna.</p> <p>Potential for acid generation through exposure of acid sulphate soils</p> <p>Disturbance of local hydrology</p> <p>Disturbance of aboriginal relics</p>

	Importing Fill	Only clean fill allowed. PoEO Act implications Disturbance of surface and ground water flows Traffic controls
	Dust Generation	Health effects on personnel/community. Impact on Flora/fauna.
	Soil Erosion	Loss of Soil. Sediment transport and sedimentation/impaired drainage. Contamination of surface waters.
	Waste Generation	Inappropriate use of resources with off-site disposal to landfills.
		Creation of vermin refuge.
		Contamination of surface waters.
Noise Generation	Noise nuisance for the neighbourhood and work crew	
Maintenance of Stockpiles	Contamination of surface waters. Erosion/loss of material.	
Hazards Goods and Chemicals Storage and Handling	Chemical Spills	Contamination of soil, ground and surface waters.
	Waste Generation (chemical containers, packaging etc)	Inappropriate use of resources with off-site disposal to landfills. Vermin refuge.
	Gas & fumes	Degradation of air quality. Impacts on human health.
Transport and Vehicle Movement	Exhaust Emissions	Degradation of air quality.
	Dust Generation	Degradation of air quality. Health effects. Flora/fauna impact.
	Noise Generation	Environmental noise nuisance.
	Fuel and Lubricant Spills	Contamination of soil, ground and surface waters.
	Plant and Vehicle Wash downs	Contamination of soil, ground and surface waters.
	Damage to Roads	Loss of amenity. Uncontrolled drainage. Sediment transportation.

General Activities	Waste Generation	Inappropriate use of resources with off-site disposal to landfills. Vermin refuge.
	Noise Generation	Environmental noise nuisance.
	Welding, cutting or grinding	Degradation of local air quality. Environmental noise nuisance.
General	Movement of Materials into Stormwater	Contamination of soil, ground and surface waters.
Waste Generation	(process wastes such as waste oils and spent cleaning fluids, and other wastes such as oily rags)	Inappropriate use of resources with off-site disposal to landfills. Vermin refuge.
	Air Emissions	Degradation of air quality.
	Noise Generation	Environmental noise nuisance.

Any relevant environmental elements identified in any environmental due diligence investigations undertaken by, or on behalf of WEPL will be added to this register.

4.2 Risk Assessment

Potential environmental risks associated with the Project were identified during preparation of the project Environmental Assessment. The risks identified were assessed and appropriate safeguards were recommended for the Project. These safeguards are included in each Environmental Management Plan (refer Section 4.3) as mitigation measures to be applied to the Project site.

Unforeseen or unplanned activities undertaken during the project construction and operation will be identified by WEPL/WesTrac and Contractors as per the Project risk management processes detailed in the Project EHS Management Plan and appropriate controls implemented prior to the commencement of the respective activity.

4.3 Environmental Management Sub -Plan

Environmental management sub plans have been prepared to ensure that the likely sensitivities and potential impacts of the proposal are adequately and appropriately managed. Also included are the environmental requirements and safeguards for construction activity. These sub-plans are provided at Sections 4.3.1 to 4.3.12:

Table 9: Summary of environmental management sub plans

Section 4.3.1	Construction Air Quality Sub-plan;
Section 4.3.2	Erosion and Sediment Control Sub-plan;
Section 4.3.3	Construction Noise Management Sub-plan;
Section 4.3.4	Wet level Management;
Section 4.3.5	Vector Management Sub-plan;
Section 4.3.6	Construction Traffic Management Sub-plan;
Section 4.3.7	Acid Sulfate Soil Management Plan;
Section 4.3.8	Chemical, Fuel and Oil Storage and Handling Management Plan;
Section 4.3.9	Indigenous Heritage Management Sub-plan;
Section 4.3.10	Water Management Sub-plans; and
Section 4.3.11	Waste Management and Re-use Sub-plan.
Section 4.3.12	Waste Water Management Sub-plan

4.3.1 TOMAGO CEMP Construction Air Quality Management Sub-plan

Construction activities have the potential to generate air quality problems, particularly dust. Traffic and construction over unstable surfaces will require monitoring and may require mitigatory actions to prevent dust affecting operations workers and adjoining properties.

Objectives

To construct the facility in a manner that minimizes dust generation.

To ensure that practicable mitigation measures are implemented.

To prevent dust affecting adjoining properties.

To meet relevant air quality standards.

Statutory Requirements

Protection of the Environment Operation Act 1997 (POEO Act) and Regulations.

Protection of the Environment Operations (Clean Air) Regulation 2002.

Performance Criteria:

Compliance with statutory requirements.

Negligible impact to air quality beyond the boundaries of the site.

No complaints from nearby residents.

Mitigation Measures:

Vehicles and machinery brought to site are to be clean of excess dirt and dust.

Watering of potentially unstable surfaces as required.

Trucks entering and leaving the site are to have loads covered.

Trucks are cleaned before leaving the site to ensure no tracking of dirt onto access roads.

Public roads used by trucks are to be kept clean.

Drivers are to comply with onsite speed and traffic controls.

Stabilisation of surfaces as soon as practicable after completion of works.

Monitoring

Visual monitoring will be undertaken at locations where operational activities could generate dust.

Any incidents or results of monitoring undertaken should be reported as per the "Reporting" section below.

More intensive monitoring may need to be considered in response to complaints received.

Responsibilities

The Site Manager or equivalent is responsible for compliance to the relevant regulations and the provisions of the Project Approval.

The Site Manager or equivalent is responsible for ensuring all staff and contractors comply with the provisions of this air quality management sub-plan.

The EHS advisor or equivalent is responsible for carrying out routine surveillance and monitoring programs and for ensuring the investigation of complaints, incidents or breaches.

Contractors are responsible for management of dust and air quality for site activities under their control.

Vehicle drivers and plant operators are responsible for correct and safe operation.

Reporting:

The Facility Manager or other relevant person shall be responsible for reporting results of monitoring or on any incident which causes or threatens to cause material environmental harm or which breaches license or consent provisions, to the EPA or designated local authority as per the EPA guidelines.

Contractors will be responsible for ongoing implementation of dust controls.

Corrective Actions

In the event of an incident or failure to comply with relevant legislation, air quality standards or approval requirements one or more of the following corrective actions will be implemented by as appropriate:

- Undertake an investigation to determine the cause of the problem and assess processes to identify any significant sources of emissions and if required, modify activities/processes.
- Increase the use of dust control measures such as watering
- Undertake additional monitoring if required.

4.3.2 Erosion and Sediment Control Sub-plan

There is the potential for erosion of site soils and sedimentation of site drains and the adjoining wetland.

An Erosion and Sediment Control Plan (ESCP) has been prepared by ADWJohnson for overall construction activities.

Specific Erosion and Sediment Control Management Plans will be developed by individual contractors consistent with the outline below.

Objectives

To comply with the project approval.

To comply with the site ESCP.

To minimise soil erosion and the discharge of sediment and other pollutants to lands and/or waters during construction activities.

To prevent sediment moving into adjoining wetland areas.

Statutory Requirements

Compliance with:

- Conditions 2.1, 2.2, 3.8, and 3.10 of the Project Approval; and
- Any licenses or permits under the Protection of the Environment Operations Act 1997 and Regulations in particular section 120 prohibiting the pollution of waters.

Performance Criteria:

No non compliances with the requirements of the ESCP.

No sediment leaving the site.

Mitigation measures implemented in accordance with requirements of the ESCP.

Corrective actions, if required, applied, amended, recorded and reported in accordance with this CEMP.

Mitigation Measure

Sediment control devices installed before construction commences.

Stormwater runoff controlled by diversion from denuded areas.

Areas of bare surface minimised and stabilised as soon as practicable.

Stripped topsoil stockpiled for reuse on site in revegetation areas where possible, and protected from erosion by using suitable erosion control measures.

Stockpiles located close to reuse areas.

Construction vehicles to use sealed roads wherever possible to prevent any loss of load, whether dust, liquid or soils.

Rumble grids and wheel wash facilities will be used at the site exit.

Progressive rehabilitation of exposed surfaces.

Revegetation activities proceeding as soon as work activities are completed within a disturbed area.

Monitoring

Daily inspections by contractors of components of the sediment and erosion control system.

Inspections of all components of the sediment and erosion control system and the site drainage system site immediately following significant rainfall events.

Contractors to provide weekly reports on their individual areas.

Regular reviews shall be undertaken to ensure management measures are installed and kept up to current environmental standards.

The Site Manager in consultation with the EHS Advisor will randomly audit the condition and performance of erosion and sediment controls.

Responsibilities

Individual Contractors Project Managers /Environmental Representatives are responsible for activities and areas under their control and reporting of non conformances to the site EHS advisor.

Construction and Project Managers are responsible for ensuring Contractors comply with the ESCP.

The EHS Advisor is responsible for carrying out routine surveillance and auditing for ensuring the investigation of complaints, incidents and non conformances.

Reporting

Contractors are responsible for submission of weekly reports.

Project Managers are responsible for verification of Contractors' reports.

The EHS Advisor is responsible for random inspections and reporting non-conformances with weekly status reports to the Site Manager.

Any discharge of sediment from the site is to be reported by the Site EHS Advisor/Site manager to the NPWS as soon as practicable.

Corrective Actions

Should an incident in relation to matters covered by the ESCP occur, one or more of the following corrective actions shall be implemented as considered appropriate:

- Modification or cessation of damaging activities as appropriate;
- Immediate maintenance, repair or replacement of water containment structures or sediment control devices not, or potentially not, operating effectively;
- Investigation by the relevant contractor assisted by the relevant Section Manager and the site EHS Advisor to determine the cause of a problem;
- Modification of the ESCP or work practices as necessary; and
- Sediment removal from drains and control structures as soon as the operating capacity of control devices is impaired or compromised.

If required, additional monitoring to establish the efficacy of corrective action.

4.3.3 Construction Noise Management Sub-plan

A noise management plan has been prepared by Spectrum Acoustics. There are residential properties adjoining the site that could be affected by noise.

Objectives:

To construct the Project in a manner that minimizes noise effects on site neighbours, including:

- To undertake all construction activities with the objective of minimizing noise problems.
- To identify and implement practicable mitigation measures, including cessation of relevant works, as appropriate.

- To ensure there is no loss of amenity to adjoining residences due to noise emissions from site activities.
- To meet the relevant noise standards to avoid nuisance to adjoining properties during construction and operating activities.

Statutory Requirements

Conditions of the Project Approval for (07_0086).

Project Statement of Commitments.

Permit and/or license conditions applying to Contractors also apply under this sub-plan.

Performance Criteria:

Compliance with the relevant requirements of the Project Approval.

Compliance with approved operating times for construction.

Compliance with approved operational noise limits.

Compliance with the NSW Industrial Noise Policy.

No complaints from nearby residents.

Mitigation Measures:

Construction of a 3.5 metre high acoustic barrier noise barrier in accordance with the project approval.

Noise control at source.

Staff training.

Community relations, information and complaint handling.

Compliance with approved hours of construction.

Cessation of noise creating activity if necessary.

Noise auditing.

Monitoring undertaken at the most sensitive receiver locations for construction and operation activities.

Monitoring:

In accordance with the requirements of the Noise Management Plan.

Additional monitoring may be required in response to any complaint or change in operating procedures or operating intensity.

Responsibilities

Individual Contractor / Environmental Representatives are responsible for implementing noise mitigation measures for all activities and areas under their control.

Project Managers are responsible for ensuring Contractors comply with the provisions of this Noise Management Sub plan and the CEMP.

The EHS Advisor is responsible for carrying out routine surveillance and monitoring programs and for ensuring the investigation of complaints, incidents or breaches.

The Project Director / Site Manager is responsible for compliance to the relevant regulations and the provisions of the Project Approval.

Reporting

Contractors are responsible for submission of weekly and monthly noise reports.

Project Managers are responsible for verification of Contractors reports.

The Project EHS Advisor is responsible for audits and non-conformance reporting with weekly status reports to be provided to the Site Manager.

The Site Manager is responsible for reporting any incident which causes or threatens to cause material environmental harm or which breaches license or consent provisions, to the EPA or designated local authority as per the EPA guidelines.

Corrective Actions

Should noise non compliance or incident occur as a result of Project construction activities, one or more of the following corrective actions will be implemented as appropriate:

- Undertake an investigation to determine the cause of the problem and assess processes to identify any significant sources of emissions and if required, modify or cease activities/processes.
- Increase the use of noise control measures such as limiting hours of construction
- Undertake additional monitoring if required.

4.3.4 Wetland Management Sub-plan

The site drains to and adjoins an extensive wetland area that includes an internationally protected Ramsar wetland. Site construction and operations activities need to be consistent with protection of wetland values.

Objectives

To construct and operate the Project in a manner that manages potential effects on the ecology of adjoining wetlands including:

- Relocation of site amphibians (frogs) displaced by clearing.
- Monitoring of vegetation to establish:
 - Existing vegetation status
 - Baseline benchmark data and monitoring sites
- Reporting on potential edge effects of the development on the adjoining wetland including weed infestation.
- Manage construction and operate the site in accordance with DECC Guidelines for Development Adjoining National Parks.

Statutory Requirements

The Conditions of the Project Approval (07_0086) dated 7 August 2009 apply.

Project Statement of Commitments

- Avoid use of harmful chemicals
- Conduct preclearing surveys
- Apply management and monitoring plans

Performance Criteria:

Compliance with the relevant requirements of the Project Approval.

No access to the wetland area other than for monitoring and mitigation activities.

Minimal impact of the project beyond the site boundaries.

Monitoring, data analysis and reporting in accordance with the recommendations of the Wetland Management and Monitoring plan by Ecobiological.

No complaints from the NSW NPWS regarding wetland impacts.

Mitigation Measures

Soft felling of trees / attendance of ecologist.

Amphibian relocation per project approval.

Other measures if required and as agreed with NSW NPWS.

Prevention of general access to wetland areas.

Regular maintenance of site water and sediment management structures and procedures.

Cessation or modification of any activities adversely affecting or likely to affect adjoining wetlands.

Use of herbicides, fertilizers etc on site vegetated areas only to the minimum extent necessary to establish and maintain adequate surface stability.

Education of site workers.

Monitoring

Baseline monitoring as specified in the wetland management plan

- Initial identification of ecotones and community types and location of survey plots and transects
- Permanent survey plots and transects initial then annual
- Weed transect along development and wetland interface initial then annual

Weekly site inspections are to include surveillance of the wetland/project interface to ensure that construction activities are not directly affecting the wetlands.

Weekly, and after significant weather events, inspections of drains and sediment control structures and surface water discharge points from the site.

Other monitoring as required to ensure mitigation measures are applied and effective.

Responsibilities

The site EHS Advisor is responsible for:

- ensuring mitigation measures are applied;
- ensuring monitoring is carried out as required;
- ensuring that the baseline monitoring contractor reports are in accordance with the provisions of the Project Approval and relevant management plans ; and
- ensuring the investigation of complaints, incidents or non compliances with management or monitoring requirements.

Reporting:

As per relevant management plans and CEMP

The EHS Advisor is responsible for ensuring that an annual report detailing the monitoring results, inspections and non-conformances are reported reporting with weekly status reports to be provided to the Site Manager.

The Site Manager is responsible for reporting any incident which causes or threatens to cause material environmental harm or which breaches license or consent provisions, to DECCW or the NPWS as appropriate.

Corrective Actions:

Should an incident or failure to comply with relevant legislation, standards or approval requirements occur in relation to the wetland area from Project activities, one or more of the following corrective actions will be implemented :

- Undertake an investigation to determine the cause of the problem and if required, modify activities/processes.
- Increase the use of or strengthen mitigation measures such as access prevention .
- Undertake additional monitoring if required.

4.3.5 Vector (Mosquito) Management Sub-plan

The site adjoins wetlands that provide extensive mosquito habitat. Mosquito bites while potentially annoying can also transmit a number of diseases. Any ponded water on the project site has the potential to provide additional mosquito habitat.

A vector management plan has been prepared for the site

Objectives

To construct and operate the Project in a manner that minimises mosquito risk and hazard at the site and from the site.

To identify and implement all practicable design mitigation measures, for the complete water cycle of the Proposal, such that the opportunities for mosquito breeding and for mosquito entry in to work places are minimised.

To undertake all construction activities with the objective of preventing or minimising the breeding of mosquitoes at the site and minimising mosquito risk to personnel.

To ensure there is no health risk and to minimise loss of amenity due to excessive mosquito activity.

To meet the relevant mosquito management guidelines as developed for the Lower Hunter and Mid North Coast region for preventing health risks, degradation of amenity and nuisance to both the project area and to adjoining properties during construction and operating activities.

To manage construction and operational mosquito control at the site in accordance with DECC Guidelines for Development Adjoining National Parks.

Statutory requirements

The VMP has been developed against item 8.20 of the Project Statement of Commitments.

Performance Criteria

No significant ponding of water anywhere on site (both roofs and ground) following rainfall or, where there is ponding that water can drain in a minimum of time via direct infiltration to ground, or roof rainwater runoff to tanks or site runoff via swales to the stormwater retention pond.

There should be no build-up of mosquito larvae in the stormwater collection system nor in the stormwater retention pond or in the display pond, and there should be no mosquito larvae in constructed water collection or treatment devices (tanks, rainwater management structures, sewage treatment devices, water based air conditioning systems, stormwater structures).

There should be no containers or any stored materials around the site that can collect water and breed mosquitoes.

Where materials or items are to be stored outside they should be adequately protected from rainfall so that water cannot become stored.

Any temporary rainwater protection should itself be such that water cannot pond and breed mosquitoes.

There should be no significant build-up of adult mosquito numbers within buildings protected by mosquito exclusion devices (i.e., screens on doors, window, ducts, etc).

Mitigation Measures

Planned construction to include infiltration enhancement and swale drainage, plus correct construction of rainwater collection system, stormwater collection and retention system, grey and black water collection and treatment systems to minimise ponding of water and breeding of mosquitoes.

Minimising adult mosquito entry to buildings by preventative screening.

Minimising mosquito nuisance for outdoor staff by appropriate works schedules to avoid maximum mosquito risk times (dawn and dusk), and providing mosquito protection advice and materials to staff. Providing appropriate literature to staff about minimising mosquito risk and hazard.

Planned construction and operational system monitoring to ensure that mosquito exclusion devices are all working and that water drainage systems are all working correctly.

Site landscaping and pond planting will be monitored and maintained to minimise enhancement of mosquito breeding or adult mosquito shelter habitat. This would include regular lawn mowing and regular pond plant culling.

Monitoring:

A regular monitoring schedule will be implemented for inspection of the main water cycle elements to ensure no ponding of water after rainfall or arising from work practices.

Other scheduled inspections of premises and the surrounding landscaped areas would be undertaken to ensure that there is no build-up of containers or of other materials or items that could provide mosquito breeding opportunities.

Landscape and pond monitoring will be scheduled in order to schedule maintenance activities.

Additional monitoring may be required in response to any complaint or after heavy rainfall. To ensure that water drainage is adequate.

Responsibilities

Individual Contractor / Environmental Representatives are responsible for implementing Mosquito Risk minimisation and mitigation measures for all activities and areas under their control.

Project Managers are responsible for ensuring Contractors comply with the provisions of this Management sub-plan and the CEMP.

The EHS Advisor is responsible for carrying out routine surveillance and monitoring programs and for ensuring the investigation of complaints, incidents or breaches.

The Project Director / Site Manager is responsible for compliance to the relevant regulations and the provisions of the Project Approval.

Reporting:

Contractors are responsible for submission of weekly and monthly reports.

Project Managers are responsible for verification of Contractors reports.

EHS Advisor is responsible for daily inspections and non-conformance reporting with weekly status reports to be provided to the Site Manager.

Site Manager is responsible for reporting any incident which causes or threatens to cause material environmental harm or which breaches license or consent provisions, to the EPA or designated local authority as per the EPA guidelines.

Corrective Actions

Should an incident or failure to comply with relevant legislation, standards or approval requirement occur in relation to vector management from Project activities, one or more of the following corrective actions will be implemented as appropriate:

- Undertake an investigation to determine the cause of the problem and assess processes to identify any significant sources of emissions and if required, modify activities/processes.
- Increase the use of mitigation measures
- Undertake additional monitoring if required.

4.3.6 Construction traffic management sub plan

This is an interim subplan. A Construction Traffic Management Plan will be prepared by the Construction contractor. The subplan may need to be amended to be fully consistent with the final management plan.

Temporary construction traffic will be generated by:

- Earth works and filling;
- Construction of the WesTrac facility; and
- Installation and commissioning of equipment and facilities.

Objectives

To minimise the effects of construction traffic on other users of the road network.

Ensure public safety.

To ensure all practicable traffic mitigation measures are implemented.

Statutory Requirements:

All relevant traffic safety and OHS requirements

Environmental Planning & Assessment Act 1979 and Regulations.

Conditions of the Tomago Project Approval for (07_0086).

Performance Criteria:

Compliance with the requirements of the Project Approval and the RTA.

- Compliance with the RTAs Traffic Control at Worksites manual Version 3.1

- No safety incidents
- No reasonable complaints about construction traffic from neighbouring property owners or residents

Mitigation Measures:

Appropriate traffic signage.

Implementation of traffic controls.

Provision of off road parking for construction activities.

Compliance with site speed limits.

Traffic management training for relevant site workers.

Traffic safety training for all site workers.

Monitoring:

Visual monitoring of traffic movements.

Inspection of on site roads, controls and signage.

Weekly and monthly monitoring is to be reported as per the "Reporting" section below.

Additional monitoring may be required in response to any complaint.

Responsibilities

Drivers are responsible for exercising due care and responsibility for vehicles under their control and observance of safety rules.

Contractors / Environmental Representatives are responsible for implementing and monitoring traffic mitigation measures for all activities and areas under their control.

Project Managers are responsible for ensuring Contractors comply with the provisions of this Management sub-plan and the CEMP.

The EHS Advisor is responsible for carrying out routine surveillance and monitoring programs and for ensuring the investigation of complaints, incidents or breaches.

Project Director / Site Manager is responsible for compliance to the relevant regulations and the provisions of the Project Approval.

Reporting

Contractors are responsible for submission of weekly and monthly reports.

Section Managers are responsible for verification of Contractors reports.

The Project EHS Advisor is responsible for daily inspections and non-conformance reporting with weekly status reports to be provided to the Site Manager.

The Site Manager is responsible for reporting any incident which causes or threatens to cause material environmental harm or which breaches license or consent provisions, to DoP and / or local authorities as appropriate EPA guidelines.

Corrective Actions:

For any incident or compliance failure under this plan:

- Stop the vehicle / personnel involved if appropriate
- Investigate the problem and as necessary modify practices to prevent further incidents or failures
- Undertake additional monitoring as required.

4.3.7 Acid Sulphate Soils Management Sub-plan

The Tomago site is underlain by potential acid sulphate soils t located as close as 1 metre to the ground surface. Any excavation of the site or draw down of the water table could create acid drainage.

The measure of soil and water acidity is pH. Acceptable pHs for surface water is generally in the range of 6 to 8. Soils need to be managed to ensure that the pH of any runoff or discharge is within the acceptable range. Ground water and drainage need to be managed to ensure that potential acid sulphate soils stay beneath the water table.

Objectives

To comply with the project approval.

To implement the acid sulphate management plan prepared for the site.

To prevent acid drainage.

To provide a management strategy for potential acid sulphate soils on the site.

To protect the environment particularly adjoining wetland areas.

Statutory requirements

Compliance with:

Conditions 2.1, 2.2, 3.8, and 3.11 of the Project Approval; and any licenses or permits under the Protection of the Environment Operations Act 1997 and Regulations in particular section 120 prohibiting the pollution of waters.

Performance criteria

No acid drainage from the site, all discharges at or above baseline pH levels.

The site construction managed in accordance with the Acid Sulphate Soils Management Plan prepared by Douglas Partners.

Acid sulphate monitoring and reporting as required by the management plan.

Mitigation measures

All material excavated from below the water table stored in a suitably bunded area.

All excavated material kept moist.

All excavated material limed and tested prior to reuse on site.

Leachate within the bund tested and neutralised prior to release.

Bund volume sufficient to accommodate periods of prolonged or heavy rainfall.

Liming of the base of excavations.

Minimal dewatering/extraction of groundwater.

Collection of extracted ground water in a multi stage sedimentation tank .

Neutralization, if required, of extracted ground water prior to release or use on the site.

All discharges to be at or above the background pH of local surface waters.

Monitoring

Establishment of baseline surface and groundwater pH prior to excavations commencing.

Daily inspection of liming operations during construction.

Sampling and testing of excavated and limed soils at a frequency of one sample per 50m³ or daily.

Daily, and prior to discharge or reuse, monitoring of leachate pH.

Daily pH measurement of surface waters at site discharge points.

Extracted ground water monitored for pH twice daily and prior to release.

Daily inspection of bund wall integrity.

Responsibilities

The excavation contractor is responsible for all aspects of acid sulphate soils management, monitoring and recording.

The excavation contractor is responsible for the immediate reporting to the EHS advisor /Site manager all non compliances with acid sulphate soils management, monitoring and recording requirements.

The relevant Project Manager is responsible for ensuring the contractor implements the ASS management requirements.

The contractor in consultation with the site EHS advisor is responsible for investigating ASS non-conformances and making adjustments to management practices and plans as appropriate.

Reporting

The excavation contractor is responsible for submission of weekly reports to the EHS advisor.

Treatment records are to include details including date, location, time of action, neutralization undertaken, liming rate and monitoring results for soils leachate and groundwater.

Dewatering records including groundwater pH at commencement and receiving water pH.

Any discharge outside the required pH range is to be reported immediately to the local NPWS manager.

Corrective actions

Additional liming/neutralisation as indicated by monitoring results.

Adjustments to work practices as required.

Cessation of works or discharge until problems are addressed.

4.3.8 Chemical and Fuel Storage Management Sub-plan

On site storage of chemicals and fuels requires careful management given the proximity to wetlands and the potential for environmental harm.

Objective

To manage the storage, handling, use and disposal of chemicals, oil and fuels to prevent uncontrolled release harming the environment.

Statutory Requirements

There is a considerable weight of relevant regulation including:

- Protection of the Environment Operations Act 1997 and associated Regulations.
- Conditions of the project approval Environmental License or permits.
- Project approval under the Environmental Planning & Assessment Act 1997.
- Environmentally Hazardous Chemicals Act 1985 and Regulations.
- Ozone Protection Act 1989.
- Pesticides Act 1999.
- Road & Rail Transport (Dangerous Goods) Act 1997 Plus:
 - Workcover Legislation applicable in this area and procedures in relation to the safe use and handling of chemicals and oil etc.
 - Relevant Australian Standards.

Performance Criteria

Compliance with NSW and Federal regulations and relevant Australian Standards.

No release of chemicals or oil to the environment.

All hazardous materials clearly identified, appropriately stored and recorded.

No complaints from employees or neighbours concerning adverse impacts of chemicals, fuels or oils.

Mitigation Measures

Appropriate training in handling and emergency procedures.

Storage within minimum bund volume of 10%.

Operations in accordance with DECC Environmental Protection Manual Technical Bulletin Bunding and Spill Management.

Sub-contractors to maintain a list of all hazardous kept on site under their control.

WEPL Site Manager approval for the transport onto the site, storage and use of hazardous substances or dangerous goods.

Clear labelling of all fuel, oils and chemicals.

Spill clean-up kits including absorbent materials will be kept at each storage facility.

No disposal of waste or clean up materials on site.

All temporary fuel, oil, or chemical storage areas banded with suitable fire protection.

Use of appropriate monitoring, clearing of accumulated stormwater, spill containment and clean up with equipment stored in close proximity and ready for immediate use.

Emergency response procedures clearly sign posted for relevant areas.

Complaints investigated promptly and appropriate action initiated to reduce impact.

Monitoring

Daily inspections of all bulk and packaged chemical containers, banded areas and waste oil storage areas.

Daily inspections of all Contractor areas shall be conducted by the Section Managers and EHS Advisor.

Auditing of operations and management.

Responsibilities

Individual Contractors for compliance with the relevant regulations, procedures and this CEMP Sub-plan, daily inspections, records maintenance and reporting.

Project Managers for monitoring and ensuring Contractor compliance with CEMP requirements.

EHS Advisor for carrying out backup surveillance, monitoring, and auditing and for ensuring all incidents, complaints, or breaches are appropriately investigated.

Project Director / Site Manager is responsible for compliance to the relevant regulations and the provisions of the development approval in addition to direct reports to the EPA of any condition or event which may have the potential to cause significant environmental harm.

Reporting

Contractors for weekly and monthly reports and for the immediate reporting of all incidents.

Project Managers for verification of Contractors reports.

Project EHS Advisor daily inspections, non-conformance reporting and weekly status reports to the Site Manager.

The Site Manager for reporting any incident which causes or threatens to cause material environmental harm or breaches license or consent provisions to the EPA or designated local authority as per the EPA guideline

Corrective Actions

Notify Emergency Services if required.

Immediately contain the spill and Implement appropriate corrective/preventative actions.

Clean up the spill material and appropriately dispose of contaminated materials.

Notify EPA in event of incident which has the potential to cause significant environmental harm.

Investigation of all incidents and non compliances and adjustments to work practices and this CEMP as appropriate.

4.3.9 Aboriginal Heritage Management Sub-plan

There is evidence of aboriginal occupation of the project site. There are 7 identified sites comprising a considerable number of stone artefacts.

An Aboriginal Cultural Management Plan (ACHMP) has been prepared by Indigenous Outcomes. Although the landscape is significant the area generally is of low archaeological and cultural significance.

Objectives

Protection of Aboriginal cultural heritage

Compliance with the project approval.

Compliance with the ACHMP.

Statutory Requirements

Compliance with:

Condition 31 of the Project Approval

Performance Criteria:

Full compliance with the requirements of the site approval and management plan.

Notification of NSW Police and DECCW if skeletal material suspected as being of human origin is found.

Mitigation Measure

Cultural awareness training for all site contractors and subcontractors.

Attendance of Worimi site officers at all initial ground disturbing works.

Collection of Aboriginal objects as determined appropriate by Worimi site officers.

Reburial of Aboriginal objects as determined appropriate by Worimi site officers.

Monitoring

All initial ground disturbances monitored by Worimi site officers.

The EHS advisor will monitor inductions to ensure adequacy of cultural awareness training.

Responsibilities

WEPL to organize a liaison committee to manage communication with Worimi LALC.

WEPL to be the principal contact for communication with DECCW over the ACHMP.

Worimi to nominate 4 Site Officers.

Worimi to nominate a Supervising Sites Officer including contact details.

WEPL to ensure Worimi site officers receive adequate induction training.

WEPL to liaise with Worimi LALC and appoint a technical advisor/co-ordinator for cultural to contribute awareness training.

WEPL and earthworks contractors to ensure the Supervising Site Officer is informed at least 7 days in advance of earthworks including dates, location, induction requirements, hours of work and number of days Worimi presence is likely to be required.

Earthworks contractors to ensure works are carried out in accordance with the ACHMP.

Worimi Supervising Sites officer to ensure that site officers are available to supervise initial earth works.

Worimi Supervising Sites officer for all recording and archiving tasks relating to aboriginal cultural heritage.

Worimi Site officers for collection and bagging of artefacts.

Worimi LALC for determining which artefacts are to be returned to the land, and with WEPL the location for artefact return and cover by concrete slab.

Worimi LALC for providing DECCW with required information on artefacts.

Reporting

Worimi LALC to DECCW for all required artefact information.

Worimi Site Supervising Officer to WEPL that ACHMP protocols, including checklist completion, have been followed.

WEPL for records of liaison committee meetings.

WEPL for site induction records including cultural awareness training.

WEPL for reporting to DoP on overall ACHMP compliance.

Corrective Actions

Should an incident in relation to matters covered by the ACHMP occur, one or more of the following corrective actions shall be implemented as considered appropriate:

- Investigation and reporting of the incident
- Modification or cessation of protocols as appropriate; and
- Resolution of disputes in accordance with the CEMP protocol.

4.3.10 Soil and Water Management Sub-plan

A Soil and Water Management Plan has been prepared for the stage 1 construction by ADWJohnson. A groundwater monitoring plan has been prepared by Douglas Partners.

The conditions of approval under both NSW EPA Act and the Commonwealth EPBC address a range of linked water and soil management requirements for the site. Ground water, surface water, stormwater, water balance and erosion and sediment control requirements are brought together under this sub-plan to provide an integrated management approach.

The site surface and groundwater discharges flow to the adjoining wetlands. Site water management is designed to be consistent with the ecological integrity of the adjoining wetland by controlling water quality and replicating existing groundwater recharge and runoff from the site. The proposed water management scheme will cover both construction and ongoing operation of the WesTrac facility, with flexibility for adjustment of stormwater controls in the future if required.

Objectives

To construct and operate the WesTrac Facility in a manner that minimises any potential stormwater and ground water impacts on the adjoining wetlands.

To undertake all construction and operational activities with the objective of preventing any detrimental effects downstream or to adjacent sites.

To identify and implement all practicable mitigation measures, including ongoing monitoring, review and site management changes as appropriate to provide appropriate protection of the the wetland.

To manage construction and operate the site in accordance with DECCW Guidelines for Development Adjoining National Parks

Performance Criteria

Compliance with the relevant requirements of the Project Approval.

No non compliances with the requirements of the CEMP.

Provide protection to mitigate any potential stormwater impacts on the downstream receiving environment.

No significant impact to the ecology of the adjoining wetland as result of site surface water discharges.

No deliberate action shall be taken which may cause a negative effect towards or not comply with the CEMP.

Mitigation Measures

Regular inspection and maintenance of water management structures (see management plan checklist).

Gross Pollutant Traps installed at the entry to each of the constructed swales for screening of heavy sediments and litter.

Bioretention swales for collection and filtering of sediment from stormwater runoff prior to any infiltration.

Weir controls installed at the downstream ends of swales to co ordinate flows into the detention basin and manage groundwater recharge.

Caisson wells installed to provide infiltration and maintain groundwater recharge rates.

Detention pond outlet control structure for appropriate low flow discharge for the protection of existing wetland wetting and drying cycles downstream.

Monitoring of the quality of water draining from the site.

Monitoring

Regular inspections made in accordance with the inspection checklist. A major focus of these inspections shall be housekeeping and waste clearance and disposal.

The quality of surface water discharges from site will be monitored to ensure the quality of water leaving the site meets requirements and does not exceed trigger levels.

Establishment of trigger levels for management review based on 95th percentile local background levels and ANZECC marine and freshwater water quality criteria, or drinking water quality criteria, as appropriate.

Review of site and water management procedures if trigger thresholds are exceeded.

Additional monitoring may be required in response to any complaint or request by DECCW.

Surface flow will be monitored for quality and quantity at the point of site discharge.

Inspection of the constructed wetland will be made as soon as practicable after a storm or flood event and repair made promptly if necessary.

The caisson wells should be regularly inspected to ensure they are working adequately and free from sediment build up. The discharge will be monitored by the groundwater network.

Responsibilities

Individual Contractor Project Managers / Environmental Representatives are responsible for implementing appropriate mitigation measures for all activities and areas under their control.

Project Managers are responsible for ensuring Contractors comply with the provisions of this Water and Soil Management sub-plan and the CEMP.

The EHS Advisor is responsible for carrying out routine surveillance and ensuring all monitoring prescribed in the Soil and Water Management Plan and the Groundwater Monitoring Plan, including appraisal of results against trigger levels, is undertaken.

The EHS Advisor is responsible for initiating a Soils and Water management review if trigger thresholds are met or exceeded.

The EHS Advisor is responsible for the investigation of complaints, incidents or breaches of soil and water management requirements.

The Project Director is responsible for compliance with the relevant regulations and the provisions of the Project Approval.

Reporting

Contractors are responsible for submission of weekly and monthly checklist reports.

Project Managers are responsible for verification of Contractors reports.

The Project EHS Advisor is responsible for daily inspections and non-conformance reporting with weekly status reports to be provided to the Site Manager.

The Site Manager is responsible for reporting any incident which causes or threatens to cause material environmental harm or which breaches license or approval provisions, to the EPA or designated local authority as per the EPA guidelines.

Corrective Actions

Should an incident or failure to comply with relevant legislation standards or approval requirements occur corrective action will be implemented as appropriate.

Undertake investigation to determine the cause of the problem and if required, modify site activities, structures or processes.

Vary or improve control measures using flexibility in the system. This is subject to specialist stormwater engineering review prior to making any changes.

Undertake additional monitoring if required.

4.3.11 Waste Management and Re-use Sub-plan

Individual contractors will need to develop waste management plans to cover their operations on the site.

This sub plan will provide an overall framework for the plans prepared by contractors.

Wastes may be generated by:

- Works involving excavation and laying of concrete and bitumen;
- Building works;
- Fit out of the building;
- Equipment installation;
- Commissioning of equipment and systems; and
- General waste produced by the workforce.

Any waste material that is unable to be re-used, re-processed or recycled will be disposed at a facility approved to receive that type of waste.

Objective:

Maximize the reduction, recycling and reuse of waste materials during construction of the project.

Outline responsibilities for management of waste.

Compliance with project approval.

Performance Criteria:

All waste to be separated into Non-hazardous and Hazardous categories.

Recycling and reuse of waste products where possible.

No onsite disposal of waste.

Waste disposed of via appropriate contractors.

No complaints received in relation to waste management practices.

Mitigation Measures

Site induction to include waste management information.

Recording of all waste by contractors.

Waste avoidance through planning, use of pre-order and prefabricated material where possible, purchase quantities that avoid packaging and return of packing to suppliers.

Waste reuse maximisation through reuse of excavated materials on site, reuse of timber formwork, use of iron sheeting as formwork.

Waste recycling through separation and storage of recyclable and non recyclable materials in skips, use of recyclable metal drums, collection of scrap metals, separate wheelie bins for putrescible, cardboard and mixed recycling waste.

Regular collection of waste by a licensed contractor.

Classification of waste in accordance with EPA Environmental Guidelines.

Monitoring

Individual Contractors responsible for monitoring and recording housekeeping, waste collection, storage, and disposal procedures and facilities.

EHS Advisor to conduct regular surveillance of site waste minimisation and disposal activities.

Responsibilities

Individual Contractors /Environmental Representatives are responsible for waste disposal activities and areas under their control.

Project Managers are responsible for ensuring contractors comply with the CEMP.

EHS Advisor is responsible for carrying out routine surveillance and monitoring programs and for ensuring the investigation of complaints, incidents or breaches.

The Site Manager is responsible for compliance to the relevant regulations and the provisions of the development approval.

Reporting

Contractors are responsible for submission of weekly and monthly reports.

Project Managers are responsible for verification of Contractors reports.

The EHS Advisor is responsible for daily inspections and non-conformance reporting with weekly status reports to the Site Manager.

The Site Manager shall be responsible for reporting any incident which causes or threatens to cause material environmental harm or breaches license or approval provisions to the EPA or designated local authority as per the EPA guidelines.

Corrective Actions:

In the event of a failure to comply with the CEMP, the relevant Contractor shall:

- Inform the EHS Advisor;
- Investigate the non compliance to determine the cause of the problem;
- Modify work practices or waste management procedures as necessary to improve non-hazardous waste management; and,
- Report the results of the investigation to the EHS Advisor.

4.3.12 TOMAGO CEMP Environmental Management Sub-plan – wastewater

The project site is not connected to sewer. Plans to provide a sewer system are well advanced but may the timing is uncertain.

Provision has been made for onsite treatment for the WesTrac facility once operational.

Provision of temporary facilities for site construction will be made by the Construction contractor(s).

Objective

To construct and operate the Project in a manner that minimizes pollution from the site, including treated effluent from the onsite wastewater treatment system.

To undertake all construction activities with the objective of preventing wastewater from leaving the site.

To identify and implement all practicable environmental mitigation measures, including cessation of relevant works, as appropriate, such that a wastewater discharge should occur at any time.

To ensure there is no health risk or loss of amenity due to wastewater emissions from site activities.

To meet the relevant treated effluent quality standards for preventing degradation of soil and the surrounding sensitive receiving environment and nuisance to adjoining properties during construction and operating activities.

To manage construction and operate the site in accordance with DECC Guidelines for Development Adjoining National Parks.

Performance Criteria

Compliance with the relevant requirements of the Project Approval.

Temporary toilets are available on site and adequately maintained for the construction period.

No effluent discharge onto adjoining sites.

Minimal impact from wastewater management beyond the boundaries of the Project site.

Treated Effluent to meet Target effluent quality outlined in Wastewater Management.

Plan prior to irrigation onsite.

Mitigation Measures

All wastewater to be tertiary treated onsite or discharged to the Hunter Water Main.

All wastewater onsite disposal in accordance with Martens & Associates Report

The Wastewater Treatment Plant to be fully maintained and operated in accordance with manufacturer's specifications.

Monitoring

Monitoring of the Wastewater Treatment & Irrigation System shall be in accordance with the Wastewater Management Plan, (W&A, 2009)

Additional monitoring may be required in response to any complaint or accidental discharge of effluent.

Responsibilities

Construction contractor to provide and maintain temporary toilet facilities.

Section Managers are responsible for ensuring Contractors comply with the provisions of this Wastewater Management sub-plan and the CEMP.

The EHS Advisor is responsible for carrying out surveillance and monitoring programs and for ensuring the investigation of complaints, incidents or breaches.

Project Director / Site Manager is responsible for compliance to the relevant regulations and the provisions of the Project Approval.

Reporting

Contractors are responsible for submission of weekly and monthly reports.

Section Managers are responsible for verification of Contractor reports.

The project EHS Advisor is responsible for daily inspections and non-conformance reporting with weekly status reports to be provided to the Site Manager.

Site Manager shall be responsible for reporting any incident which causes or threatens to cause material environmental harm or which breaches license or consent provisions, to the DECCW or designated local authority as per the DECCW guidelines.

Corrective Actions

Should an incident or failure to comply with relevant legislation, standards or approval requirement occur in relation to Wastewater from Project activities, one or more of the following corrective actions will be implemented as appropriate:

- Undertake an investigation to determine the cause of the problem and assess processes to identify any significant sources of emissions and if required, modify activities/processes.
- Undertake additional monitoring if required.

4.4 Construction Environmental Monitoring Program

The project construction requires a significant range of environmental management measures. An essential component of the implementation is the ongoing environmental monitoring. The monitoring will provide confirmation of project compliance as well timely alerts to management problems.

Monitoring and reporting requirements are specified in the project approvals and individual management plans

Table 10: Summary of Stage 1 Construction monitoring requirements

Media	Parameters	Frequency /action level	Reporting responsibility
	Compliance with approvals:	Daily and Ongoing	Weekly - contractors to section managers to EHS advisor
	As required by DoP under Condition 46 of the project approval		Fornightly - EHS to site manager
	As required by condition 9 EPBC approval		Monthly - Site manager to WEPL

			Annual - WEPL to DoP / NPWS Annual - WEPL to DEWHA (Within 3 months of every 12 anniversary of commencement)
	Dilapidation report	Preconstruction only	WEPL
	Annual report to DoP Summary of monitoring outcomes against performance standards	Annual	WEPL to DoP WEPL to NPWS
	Annual report DEWHA Summary of monitoring outcomes against performance standards	Within 3 months of every 12 anniversary of commencement	WEPL to DEWHA
	Commencement reporting	Within 10 days of commencement	WEPL to DEWHA
Air	Air quality	Daily	Contractors to site manager
Air	Odour	Operational only	NA
Air	Dust	Continual / visual assessment during site works	Contractors to EHS Advisor
Air	Noise	Continual / as prescribed in the Noise Management plan and project approval	Contractors to EHS Advisor
Ground	Acid sulphate soils	i) Baseline and on going surface water quality ii) Per 50m3 soil extracted	Contractors to EHS Advisor

		<ul style="list-style-type: none"> iii) Liming rates as applied iv) Leachate water daily v) Leachate and surface water quality during any discharge / action levels as detailed in management plan 	
Ground	Groundwater	Ongoing until it is established the project is not adversely affecting the adjoining wetland	Monitoring Contractor to EHS Advisor
Ground	Fill quality	Per site delivery	Earth works Contractor to EHS Advisor
Ground	Erosion and sediment controls	Ongoing and event based checking of the operational efficiency of controls	Contractors to EHS Advisor
Water	Surface water quality	<p>On going – to establish project is not adversely affecting adjoining wetlands</p> <ul style="list-style-type: none"> i) establish baseline ii) establish trigger levels iii) ongoing monitoring of detention basin 	Monitoring Contractor to EHS advisor
Water	Surface water quantity	Discharge monitoring - on going until it is established the project is not adversely affecting adjoining wetlands on the Hunter Estuary Ramsar site	Monitoring Contractor to EHS advisor
Vegetation	Preclearing	As required	Contractor to EHS advisor
Vegetation	Ecological baseline	Ongoing until it is established the project is not impacting on the Hunter Estuary Ramsar site	Contractor to site EHS advisor
Ground	Rehabilitation / revegetation areas	Ongoing + after rain events or storms	Contractor to site manager
Ground	Drains	Weekly + after rain events or	Site EHS advisor to site

		storms	manager
Ground	Aboriginal Cultural heritage	Earthworks monitoring	Worimi Site Supervising Officer and LALC to DECC
Vehicles	Traffic	Ongoing	Contractors to section managers EHS advisor/ site manager
Water and vegetation	Vectors (mosquitos & midges)	Ongoing, minimise mosquito breeding opportunities	EHS advisor to site manager
	Incidents	Per occurrence	Contractors to EHS Advisor to Site manager as appropriate
	Complaints	Per occurrence	Site manager to WEPL
Ground	Site & construction generally	As required to verify /audit compliances	EHS advisor to site manager
Ground	Wetland interface	Weekly + after rain events/storms	EHS advisor to site manager
	Annual report DoP	Annual	WEPL to DoP
	Summary of monitoring outcomes against performance standards		WEPL to NPWS
	Annual report DEWHA	Within 3 months of every 12 anniversary of commencement	WEPL to DEWHA
	Summary of monitoring outcomes against performance standards		
	Commencement reporting	Within 10 days of commencement	WEPL to DEWHA

5.0 Evaluation, Auditing and Review

To achieve effective ongoing environmental management a system of evaluation, auditing and review is required needed that includes improvement and updating of the CEMP.

5.1 Environmental performance evaluation

The purpose of evaluation is to provide information on the environmental performance of the project including the effectiveness of the CEMP.

The environmental indicators for the project are as set out in the section 1 and as detailed in section 4 under the individual subplans.

Scheduled monitoring of environmental performance and formal compliance auditing of environmental management systems is required throughout the Project lifecycle. This will enable the overall effectiveness of established environmental controls and compliance procedures to be assessed, and allow areas of underperformance to be identified so corrective actions can to be taken to strengthen environmental safeguards or improve outcomes.

The project evaluation program is further supported by engaging external environmental consultants to conduct baseline and ongoing scheduled environmental monitoring and sampling of key areas identified as having potential for impact by the project.

5.2 Environmental Monitoring – General Inspection Guidelines

The following sections detail the minimum environmental monitoring and inspections to be conducted on the Project. Specific monitoring information is provided at each sub-plan (Section 4.3 of this CEMP).

5.2.1 Routine Daily Walkthrough Inspections

A system of daily walkthrough inspections formulated for the Project is essential. In brief, Project EHS Advisor, in company with the responsible person from each contractor – and from time to time the Site Manager, shall ensure daily visual inspections of all construction activities and work areas are conducted to monitor compliance with this and contractor CEMPs.

The results of daily inspections shall be recorded on a Daily Site Surveillance Form. An example of such a form is provided at Appendix F. All non-conformances shall be actioned as outlined in each Management Sub-plan referred to in Section 4.3 of this CEMP.

5.2.2 Weekly Environmental Field Inspections & Reports

Weekly environmental field inspections (refer Appendix G) shall be conducted by each contractor and reports submitted to the section manager for approval prior to being forwarded to Project EHS Advisor for review and filing.

5.2.3 Monthly Environmental Field Inspections & Reports

In addition, contractors shall be required to submit a monthly report (refer Appendix H) on overall environmental performance – formally transmitted with the Monthly EHS Report, to the Project EHS Advisor by the 2nd working day following the end of the month.

The report shall include (in addition to the OH&S component), a summary of environmental issues and actions during the period to ensure compliance with the Project CEMP including details of any action item requests, complaints received, incidents and associated investigations and corrective actions, and environmental inductions and awareness training provided during the period.

5.2.4 Event Based Checks

Event based checks shall be conducted by Project EHS Advisor following any significant event such as rainfall of sufficient quantity to generate run off, high winds, following excavations, the receipt of an environmental complaint, or the issue of a corrective action request (CAR) or non conformance report (NCR).

5.3 Formal Environmental Management Systems Audits

The Project EHS Advisor is responsible for developing an environmental surveillance and auditing schedule.

Audits shall include:

- Direct Contractor Audits – consisting of a formal systems audit one month after commencing work on the site and again at three monthly intervals whilst engaged on the Project;
- Self-Assessments – An internal management tool for assessing overall Project EHS compliance;
- Verification Assessments – An internal audit conducted by a specialist offsite team to verify self-assessment outcomes; and
- Internal critical reviews /analysis – at intervals not exceeding six months, of the Project EHS Management Plan, CEMP, and related documentation.

5.4 Environmental Monitoring & Sampling – External Consultants

Specific environmental monitoring requirements and instructions are located in the management procedures of the relevant sub plans incorporated in this CEMP.

Monitoring, including sampling with field instruments and the establishment of quality control and chain of custody protocols for laboratory testing will be the responsibility of the EHS Advisor.

5.5 Non-Conformance and Corrective and Preventive Action

Where substandard performance is observed the contractor will be notified. Should the performance not improve as required and within a specified time frame, a formal Project Non-Compliance Notice (NCR) will be issued and appropriate action taken to rectify the non-compliance or fault.

5.6 Performance Reporting & Recording

Overall Project environmental performance shall be reviewed in compliance with EHS performance reporting guidelines as established by the Project EHS Advisor and as required by the project approval.

The Project EHS Advisor is responsible for ensuring all relevant documentation is submitted and maintained within the Project filing and document control system.

Required documentation will include:

- all accidents and incidents reports and investigation outcomes;
- weekly and monthly environmental checklists and reports files by contractors;
- internal and external audit and environmental monitoring reports including NCR reports, and any laboratory analysis submitted by external consulting groups;
- records of environmental training;
- laboratory analysis reports and instrument calibration records;
- chain of custody records; and
- minutes of meetings.

The EHS Advisor shall report weekly to the Site Manager on the status of site environmental matters.

In addition to their weekly checklists, contractors shall report monthly to the Project EHS Advisor on environmental issues and the overall status of the CEMP and regulatory compliance.

The Site Manager is required to report monthly to the Project Director on the status of site environmental matters.

If, under any Environmental Protection Act, any other Act or Regulation, conditions of a permit or approval, or license, a report is required to be made to a regulatory authority, the report shall be made by the relevant holder of the authority following consultation with the Site Manager. A copy of any such report shall be provided to the Site Manager, via the EHS Advisor, for review and approval of the content prior to the submission of the report to the regulatory authority.

5.6.1 Pre-operation compliance audit

Work as executed plans are to be submitted to the NSW Department of Planning prior to commencement of WesTrac operations.

A final construction compliance report is to be completed and lodged with DoP prior to commencement of WesTrac operations. Any matters from the construction phase requiring ongoing management or monitoring are to be detailed for inclusion in the WesTrac Environmental Management Strategy (Appendix C).

5.6.2 Annual reporting

Within 12 months of the approval and annually thereafter an Annual Environmental Management Report is to be submitted to the NSW Department of Planning. The report must address the matters required by the project approval plus the matters identified below.

Matters to be addressed in the annual report.

- a) Identify the standards and performance measures that apply to the project;
- b) Describe the works carried out in the last 12 months;
- c) Describe the works that will be carried out in the next 12 months;
- d) Include a summary of the complaints received during the past year and compare this to the complaints received in previous years;

- e) Include a summary of the monitoring results for the project during the past year;
- f) Include an analysis of these monitoring results against the relevant:
 - Impact assessment criteria/limits;
 - Monitoring results from previous years; and
 - Predictions in the EA;
- g) Identify any trends in the monitoring results over the life of the project;
- h) Identify any non-compliance during the previous year; and
- i) Describe what actions were or are being, taken to ensure compliance.

5.7 Review of CEMP

Regular comprehensive review of a CEMP is essential. The review provides for continual improvement and an ongoing commitment to environmental management.

A full review of this CEMP and associated sub plans and documentation by the EMR shall take place at intervals not exceeding six months for the life of the Project.

It is expected that the CEMP will require amendment to reflect the practicalities of working on the project site.

Minor amendments can be made by the EMR or EHS Advisor.

Major amendments should not be made without the approval of the author of any relevant management plan or the NSW Department of Planning. A major amendment is where a proposed change is inconsistent with a condition of project approval.

Appendix A

Conditions of Project Approval

Appendix B

Statement of Commitments



Appendix C

WesTrac Corporate EHS Policy Statement

WesTrac Pty Ltd
Environmental Management System

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1.0 Scope and Purpose of the Environmental Management Plan

This Environmental Management Plan has been developed for WesTrac Pty Ltd to facilitate implementation of the Environmental Policy at our operations and client sites.

The Environmental Management Plan provides an outline of the policies, procedures, and corporate strategy and core values to be adhered to by WesTrac employees. WesTrac's Environmental Management Plan has been developed in accordance with ISO1400.

Our environmental management goals are achieved through:

- Management commitment through involvement;
- A policy and philosophy aimed at making environmental management a way of life;
- Environmental objectives developed as critical component of business plan.

We encourage anyone with queries about this plan or environmental issues in general to contact the Health, Safety & Environmental Adviser.

2.0 Project Scope

The Environmental Management System is applicable to all operational aspects, which have the potential to adversely affect the ecology of the area and its surrounds through the execution of the following locations:

Contact Name:	Michael Brack – QA, HSE Manager
Contact Number:	(08) 9377 8618
Location:	All WesTrac Sites / Contract Operations
State:	Western Australia and New South Wales

2.1 Project Details

Nature of work:	Service and Sales of Earthmoving Equipment	
WesTrac number of personnel:	1332 (W.A.)	854 (N.S.W.)

3.0 General Requirements

3.1. Environmental Management Plan Details

The Environmental management system provides a structured process for the achievement of continual improvement, the rate, and extent will be determined by WesTrac in light of economic and other circumstances.

The Environmental Management System shall:

- Review and continually update the Environmental Policy;
- Identify the environmental aspects arising from WesTrac's past, existing or future activities, products or services, to determine the environmental impacts of significance;
- Identify relevant legislative and regulatory requirements;
- Identify priorities and set appropriate environmental objectives and targets;
- Establish a structure and a programme to implement and achieve objectives and targets;
- Facilitate planning, control, monitoring, corrective action, auditing and review activities to ensure both that the policy is complied with and that the environmental management system remains appropriate; and
- Be capable of adapting to changing circumstances.

4.0 Environmental Policy

WesTrac considers that care for the environment is an integral part in conducting its business as a supplier of mobile equipment and service provider to industry.

WesTrac is therefore committed to continuous improvement in policies, procedures and performance in order to protect the environment in accordance with the requirements of the law, clients and the evolving expectations of the community.

Specifically, WesTrac shall:

- Comply with and uphold the spirit of, all applicable laws, regulations and standards.
- Plan, develop, implement and monitor appropriate procedures and standards to minimise any adverse environmental impact which may result from our operations.
- Ensure that our employees, suppliers and subcontractors are fully aware of this policy and their environmental responsibilities in relation to company business activities.

Relevant Documents
WesTrac Environmental Policy

5.0 Planning

5.1. Environmental Aspects

The environmental policy, improvement plans and management programs are developed to ensure that activities at our operations and the Clients Operations are managed to minimise impacts on the environment.

In developing WesTrac's Environmental Management System a review was carried out to identify potential environmental impacts.

The review is to identify significant environmental aspects that should be addressed as a priority by the environmental management system. The review specifically covered the following areas:

- Legislative and regulatory requirements;
- An identification of significant environmental aspects;
- An examination of all existing environmental management practices and procedures; and
- An evaluation of feedback from the investigation of previous incidents.
- Contamination of drains,

Environmental aspects associated with the activities at operating units, should, where relevant, consider:

- Emissions to air
- Releases to water
- Waste management
- Contamination of land
- Use of raw materials and natural resources; and
- Other local environmental and community issues
- Safe disposal of hydrocarbons and hydrocarbon absorbent materials.

A risk assessment process is used to rank the environmental aspects and impacts according to potential environmental impact, frequency or likelihood of occurrence, legislative or other requirements, stakeholder concerns (including community and employees), and financial liability.

All potential impacts ranked as 'significant' must have systems in place to mitigate or minimise the impact on the environment. The plan outlines those systems and where associated procedures and other documentation is located.

The potential significant environmental impacts identified are:

- Contamination of soil, surface water and groundwater from the use and storage of hydrocarbons;
- Increased noise levels from blasting, use of heavy equipment, conveying and crushing;

- Inefficient use of water for dust suppression and wash-down of workshops; and
- High energy intensity of operations due to inefficient energy use and use of non-renewable fuels.

5.2. Risk Assessment and Risk Management Relevant Procedures

All employees must manage hazards by the risk management process of hazard identification, risk assessment, risk control and monitoring.

Controls that are put in place need to be monitored to ensure that they are effective in controlling the risk. Inspections, audits, tool box meetings and incident reports are possible methods to achieve this. Graphs are produced from reported incidents to monitor Risk Exposure.

Step 3 - Calculate the Risk

<u>WesTrac Risk Assessment</u>					
<u>Calculate the Risk</u>					
	<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>
<u>1</u>	<u>1</u> High	<u>2</u> High	<u>4</u> High	<u>7</u> High	<u>11</u> Significant
<u>2</u>	<u>3</u> High	<u>5</u> High	<u>8</u> High	<u>12</u> Significant	<u>16</u> Moderate
<u>3</u>	<u>6</u> High	<u>9</u> Significant	<u>13</u> Significant	<u>17</u> Moderate	<u>20</u> Moderate
<u>4</u>	<u>10</u> Significant	<u>14</u> Significant	<u>18</u> Moderate	<u>21</u> Lower	<u>23</u> Lower
<u>5</u>	<u>15</u> Significant	<u>19</u> Moderate	<u>22</u> Lower	<u>24</u> Lower	<u>25</u> Lower
<u>Note: 1-15 Ranking Requires a JSA and Training before activity Commences</u>					

Relevant Documents

WesTrac Environmental Policy
SP OHS GEN 018 - Environmental and Waste Management
SP OHS GEN 014 - Hazard Management
SS OHS GEN 021 - Pollution
SS OHS GEN 019 - Ventilation - Natural and Artificial

5.3. Legal and Other requirements

The identification, review and communication of legal and other requirements such as Government guidelines, company standards is undertaken by the HSE Adviser. Any changes or new legislation is communicated to the sites via the HSE adviser.

WesTrac's Management System comprises a comprehensive set of standards, legislation, operating standards and procedures for the management of safety, health and environmental issues. The system is regularly updated to include requirements for such things as:

- Mines Safety and Inspections Act and Regulations
- Occupational Safety and Health Act and Regulations
- Dangerous Goods Act and Regulations
- Australian Standards
- Environmental Protection Act & Regulations 1986, 1987
- Environmental Protection (Controlled Waste) Regulations 2001
- Environmental Protection (Noise) Regulations 1997
- Explosives & Dangerous Goods Act 1961 and Dangerous Goods Regulations 1992
- ISI 14001

5.4. Objectives and Targets

The environmental objectives have been set to lead to an improvement in WesTrac's ability to improve its performance and help to meet the needs of the stakeholders in the company, including both the internal and external customer.

These company objectives are always under review and may be changed and/or improved to suit changing legislation, conditions etc.

Relevant Documents
SS OHS GEN 007 - Injury Disease Statistics and Safety Achievement Reporting

5.5. Environmental Management Programme(s)

The Clients Operations determines milestones after taking account their environmental impacts, consideration to financial, operational and business requirements and the views of relevant interested parties. Objectives are reviewed annually and progress reviewed quarterly by the Human Resources Adviser.

WesTrac will assess and review the environmental management programmes and commit to continual improvement via assessing:

- Needs and expectations of the customer and other interested parties;
- Performance of the products and/or services;
- Performance of operational processes and associated practices;
- Learning from previous experiences; and risk identification and analysis.

The review will be done via the use of Management reviews, strategy team meetings, toolbox and safety meetings, non-conformance (QAD's) review, product review with Caterpillar and other suppliers, plus other relevant information that is available (with input from the Clients Operations personnel).

The outputs of the review will also identify:

- Responsibility and authority for execution of the improvement plans;
- Skills and knowledge needed;
- Improvement approaches, methods and tools;
- Requests for provision of resources;
- Contingency plans; and
- Indicators for degree of achievement; and need for records.

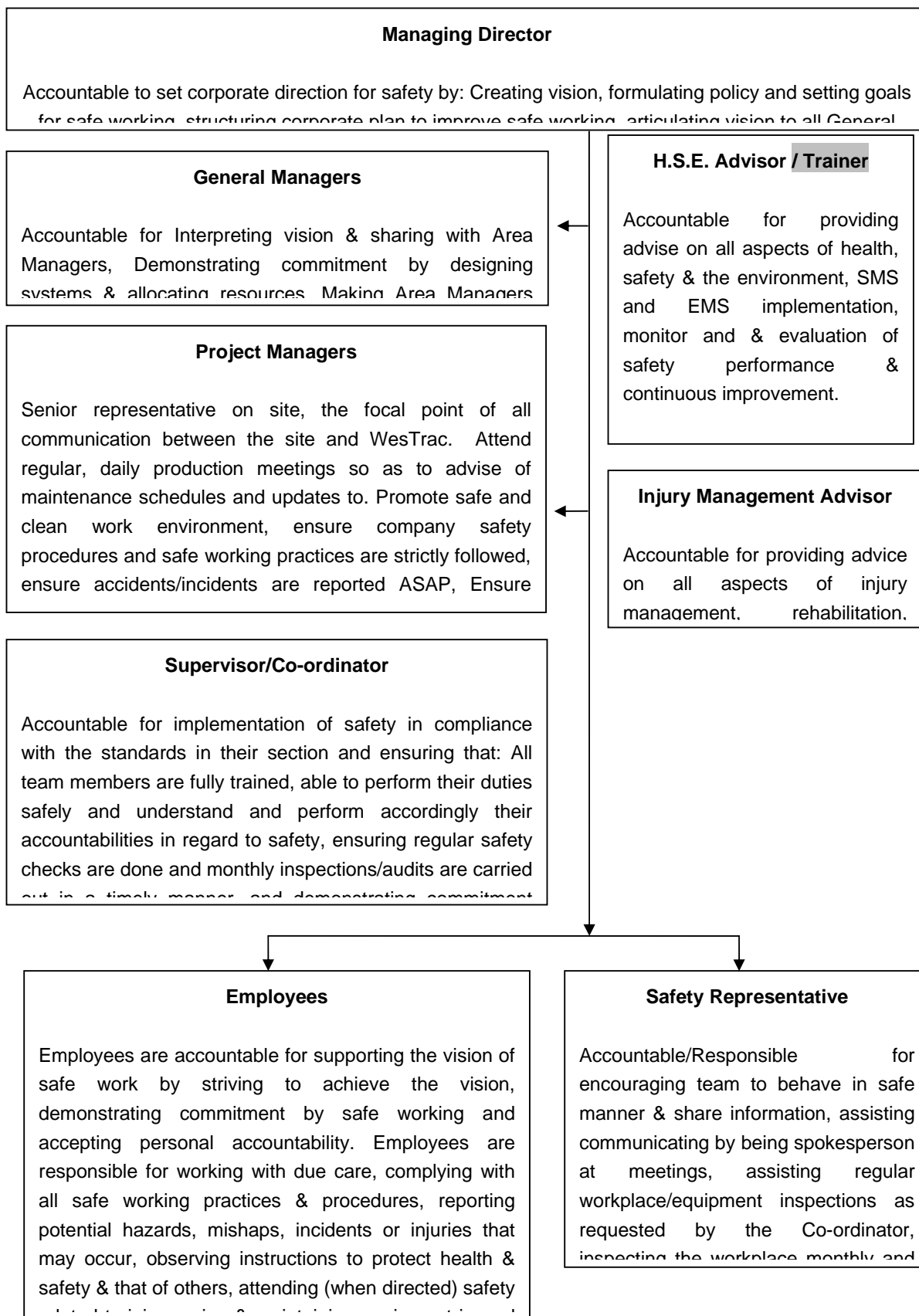
6.0 Implementation and Operations

A culture shall be developed progressively as such that environmental awareness and protection become an integral part of our core business.

This shall be achieved by:

- Including environmental issues as part of WesTrac's and the Clients Operations induction,
- Raising environmental issues at toolbox meetings,
- Considering environmental factors in planning and operational decisions,
- Auditing our environmental performance and publishing our audit results to the workforce.
- Promoting the reporting of environmental issues.

6.1. Structure and Responsibility



The Project Manager is responsible for:

- Ensuring that the site's environmental management system requirements are established, implemented and maintained in accordance with the ISO 14001 standard.
- Assisting with the setting of environmental goals for the mine.
- Coordinating the site's environmental activities.
- Implementing corporate environmental policies.

All employees and contractors are expected to understand and apply WesTrac's Environmental Policy and the Environmental Values of WesTrac. Detailed environmental roles and responsibilities are defined within the Position Descriptions for all employees.

Specific responsibilities are outlined within WesTrac's Standards within the Roles & Responsibilities section.

Relevant Documents
SS OHS GEN 001 - Management and Employee Accountabilities and Requirements for HSE

6.2. Training and awareness and competence

6.2.1 Training and Inductions

Environmental training is undertaken at the site to ensure that personnel whose work may have a significant impact on the environment have received training appropriate for their job and are suitably competent.

The main sources of environmental training at the site are:

- Inductions
- Environmental Training
- Operational Training

Minimum competencies for job functions are outlined in the Position Descriptions.

Employee training records are maintained on the company's training system. Each site shall maintain a comprehensive training matrix outlining employees and contractors that have received the relevant training.

6.2.2 Employee and Contractor Training

All new employees and contractors receive an induction that covers WesTrac's Environmental, Health and Safety policy and the site's environmental management systems for significant impacts such as spills, noise and waste.

6.2.3 Environmental Training

Employees receive formal and informal training in areas relevant to their duties, as well as general environmental awareness training. Training requirements for personnel in the management of significant environmental impacts such as hydrocarbon management and spill cleanup, waste management, water conservation and noise management are identified, scheduled and managed as per the training needs identification process.

The aim of this training is to raise awareness of the impact and ensure that people understand how their actions can minimise or prevent that impact from occurring. The Human Resource Adviser determines the environmental training requirements in conjunction with the Project Manager on an annual basis.

6.2.4 Operational Training

Procedures and Standard Practice (SP) are written for critical site activities that may have a significant impact on the environment. Operational training is undertaken by each department using these procedures.

The aim of this training is to ensure that all personnel understand their roles and responsibilities and the importance of following SP's and procedures. The training focuses on ensuring that personnel understand the potential impacts on the environment their activities may have if they do not follow these standardised procedures.

Relevant Documents
SS OHS GEN 003 - Safety and Health Representatives and Committees
SS OHS GEN 008 - Induction, Safety Courses and Training
SS OHS GEN 029 - Emergency Preparation Procedures and Training
SS OHS GEN 013 - Safe Work Procedures

6.3. Communication

WesTrac is committed to communicating promptly and openly with employees, stakeholders and the community. Communication on environmental issues is undertaken in several different ways.

6.3.1. Internal Communication

Environmental communication is undertaken within WesTrac at various levels and via various methods. Communication not only occurs within the site, but between WesTrac operations state wide and with the head office in South Guildford.

All teams have a monthly Team Meeting which, include environmental, Health and Safety incidents, performance and improvement programmes are discussed. These meetings are also used to undertake formal environmental training programs.

These meetings discuss environmental issues such as incidents, performance, new legislation or other requirements, audit findings and actions and any new

programmes that may require environmental input. Internal reports are used to communicate to management.

6.3.2. Environmental Incident Reporting

All employees are required to report environmental incidents. A computerised database is used for the reporting and recording of these incidents. All employees have access to the system either directly or through their supervisor. The report covers what happened, what was done immediately to rectify or control the situation, and corrective actions to be undertaken to prevent recurrence of the incident.

All environmental incidents are investigated to determine the cause and the actions to be taken. Investigations are undertaken as per the procedure, environmental incidents and corrective actions are reviewed at team meetings.

Relevant Documents
SS OHS GEN 007 - Injury Disease Statistics and Safety Achievement Reporting
SS OHS GEN 011 - Management Self Audits
SS OHS GEN 031 - Occupational Hazard, Injury, Incident and Disease Reporting
SS OHS GEN 010 - Workplace Inspection

6.3.3. Community Consultation

It is WesTrac's policy to operate in a safe, responsible manner which respects the environment and the health of our employees, our customers and the communities where we operate.

Effective consultation ensures the community is informed about WesTrac's operations and allows them to provide feedback.

WesTrac uses both formal and informal processes to communicate with neighbours, the community and local and state government. The aims of the community consultation is to:

- Provide information about our operations to help neighbours understand the impacts and how we manage them.
- Understand concerns the community may have about our operations.
- Provide the community with an opportunity to provide feedback about our management of operations.
- Provide a framework for resolution of issues that may arise between WesTrac and its neighbours.

Relevant Documents
SP EVC GUI 001 - Site Emergency Plan
Safety Induction & RTZH Training 2009

6.4. Environmental management documentation

WesTrac's Company Standards outline the elements of the environmental management programmes.

WesTrac's onsite operations location has auditable systems to manage environmental issues in a manner that recognizes all environmental risks and requirements, identifies resource needs to address the risks, establishes processes to understand and meet all requirements, develops processes to address and prevent environmental incidents and provides for continuous improvement.

The management system should be compatible with the requirements of ISO 14001.

Relevant Documents
SS OHS GEN 011 - Management Self Audits

[SS OHS GEN 013 - Safe Work Procedures](#)

6.5. Documental Control

WesTrac Standards are located on WesTrac's computer system whereby all employees have access to the information. The standards are periodically reviewed by the Human Resources Adviser – Safety, and revised as necessary.

Obsolete standards are removed from all points of access, although are retained with the Human Resource Department for reference purposes.

6.6. Operation Control

WesTrac shall identify operations and activities that are associated with the identified significant environmental aspects in line with policy, objectives and targets. WesTrac will plan these activities, including maintenance, in order to ensure that they are carried out under specific conditions.

6.7. Emergency preparedness and response

Effective environmental management systems require that each operating facility have an emergency response controls and procedures to minimise hazards to human health and the environment from fires, explosions and releases of certain substances to the air, surface water, soil and groundwater.

The standard requires that each location prepare an emergency planning and response plan that includes identification of possible emergency situations, the development of spill prevention, control and countermeasures, establishment of emergency response and reporting procedures, completion of periodic training programs and appropriate review of the plan.

The Clients Operations have Wardens who respond to emergency situations at the site. The sites have detailed emergency response plans that cover situations such as fires, major storm events, spills of hazardous materials, lost fieldworkers and evacuations.

Spill response strategies and an inventory of storage locations and their volumes are included in the Site Emergency Plan.

Emergency situations are assessed when developing and reviewing the sites. This review identifies any emergency situations that may impact on the environment. Actions are then put in place to ensure the situation is managed to minimise this impact.

The plan and associated procedures and standard work instructions are in the quality controlled document system, controlled hard copies are also located within each department.

Relevant Documents
SS OHS GEN 026 - Fire Protection and Prevention
SS OHS GEN 029 - Emergency Preparation Procedures and Training
SP EVC GUI 001 - Site Emergency Plan

7.0 Checking and Corrective Action

7.1 Monitoring and measurement

WesTrac's Company Standards outline the documented procedures for monitoring and measuring, on a regular basis, the key characteristics of its operations and activities that can have a significant impact on the environment. This shall include recording of information to track performance, relevant controls and conformance with WesTrac's environmental objectives.

Reviews of environmental issues shall be discussed and reviewed as required with the Clients Operations personnel.

Monitoring equipment shall be calibrated and maintained and records of this process shall be retained according to WesTrac procedures.

Relevant Documents
SS OHS GEN 021 - Pollution
SS OHS GEN 015 - Hazardous Work
SS OHS GEN 018 - Lighting and Safety Glass
SS OHS GEN 019 - Ventilation - Natural and Artificial

7.2 Non-conformance and corrective and preventative action

7.2.1 Incident Reporting

WesTrac believes that all incidents, including illness, injuries, spills, can be prevented.

To support this goal, WesTrac is committed to thoroughly investigating incidents. Through timely and effective investigation, the company can identify contributing causes and work to prevent incidents in the future as we work toward our goal of an incident-free workplace.

Each location is responsible for reporting work-related injuries/illnesses, Environmental Major Incidents, non-work related deaths that originate or occur on WesTrac property, contractor data, and environmental incidents.

7.2.2 Reporting Requirements

WesTrac is required to submit reports, both internally and externally, as part of legal and other external requirements. Reporting on the sites operations is an important component of the site's environmental communication processes.

All environmental incidents and accidents shall be reported and investigated. All spills shall be reported within 24 hours to the relevant Area Manager as per Procedure.

Relevant Documents
SS OHS GEN 007 - Injury Disease Statistics and Safety Achievement Reporting
SS OHS GEN 011 - Management Self Audits
SS OHS GEN 031 - Occupational Hazard, Injury, Incident and Disease Reporting

7.3 Records

The documentation for the Environmental Management System is located within the company computer system.

Environmental records that may be applicable:

- Information on applicable environmental laws or other requirements
- Complaint records;
- Training records;
- Process information;
- Product information;
- Inspection, maintenance and calibration records;
- Pertinent contractor and supplier information;
- Incident reports;
- Information on emergency preparedness and response;
- Information on significant environmental aspects;
- Audit results; and
- Management reviews
- Outcomes of investigations (action tracking)
- Incident graphs (risk monitoring)

7.4 Environmental Management System Audit

Management self audits are intended to protect employees by assessing the ability of our environmental management system to identify and remove hazards, thus minimise risk.

The Human Resources Department will audit the COO and OHS Manager requirements as outlined in the Company Standards on a yearly basis.

The Project Manager is accountable for evaluating system practices by taking part in the divisional audits specified, and ensuring Area Supervisors are taking part in Departmental evaluations and audits.

The Project Manager is accountable for safeguarding the welfare of all people in the Department by continually appraising the work environment in a way that identifies the incidence and nature of unsafe work, designing and modifying processes to reach the goal of intrinsically safe work, and taking part in formal audits of their Departments as specified in the audit frequency

The Area Supervisor is accountable for monitoring and improving safe work practices against existing standards by ensuring audits are conducted as specified in the audit frequency.

An external audit shall be undertaken annually and may be conducted by WesTrac personnel external to the operation.

Relevant Documents
SS OHS GEN 011 - Management Self Audits

7.5 Job Safety Analysis (JSA)

Job Safety Analysis are completed prior to a job beginning. The JSA must reflect the present situation, thus it needs to be reviewed with changes to the job plan.

All environmental hazards identified on the job shall be controlled and any pertinent information should be reported for inclusion at the team meeting.

Team meetings should be used to discuss the JSA content with all people on the job. If new personnel come onto the job the JSA shall be discussed as part of the job induction, the JSA training manual located on the WesTrac Intranet is to be used as a guide – template included.

Relevant Documents
SS OHS GEN 050 - Job Safety Analysis
SS OHS GEN 013 - Safe Work Procedures
SS OHS GEN 004 - Safety Communication and Safety Meetings

8 Management Review

In order to maintain continual improvement, suitability and an effective environmental management system, a management review shall be conducted biannually.

The management review shall include:

- a review of policy, procedure, and objectives;
- results from audits
- the extent to which objectives and targets have been met;
- continuing suitability of the environmental management system, in relation to the changing conditions; and
- concerns amongst relevant interested parties.

Management Review meetings may be held more frequently if appropriate circumstances warrant them.

Appendix D

Environmental Emergency Preparedness & Response Management Plan

Objective: The overall management objective is to prevent incidents but should an incident occur provide for an effective rapid response to control and minimise impacts and the potential for any adverse effects.

Performance
Criteria: No incidents (no injuries, property damage, environmental incidents)
All WEPL and Contractor personnel trained in emergency response procedures

Mitigation Measures:	<p>Implementation of the Project Emergency Response procedures and the Environmental Incident Emergency Plan.</p> <p>All WEPL and Contractor employees to receive induction training which includes training in the Project emergency response and hazardous substances procedures.</p> <p>The implementation and monitoring of Hazardous Substances procedures including the maintenance of hazardous substance registers and Material Safety Data Sheets for all chemicals bought onto the Project site.</p> <p>WEPL and contractors to subscribe to Chemaalert database, to respond adequately to spills and emergencies.</p> <p>Adequate supply of spill containment materials such as booms and absorbent materials to be available in proximity to relevant storage areas with routine checks of inventory conducted to ensure they are properly located and maintained.</p> <p>Appropriately banded and sealed storage and equipment maintenance areas to contain spills.</p> <p>Contractor EMPs to identify risks and response procedures for emergencies.</p> <p>Emergency phone/radio contacts to be prominently displayed on site.</p> <p>Appropriate permanent runoff controls at all creek crossings and minor waterways and drainage paths.</p> <p>A central control point for emergency situations will be established.</p> <p>Emergency contact phone numbers for statutory services and key Site personnel shall be displayed in all office areas.</p> <p>Report spills immediately using the emergency procedure.</p> <p>Limit or contain spill using sand bags to construct bund walls, use absorbent material, temporary sealing of cracks or leaks in containers, use of geotextile or silt fencing to contain the spill.</p> <p>Mobilise heavy earthmoving equipment if required for bund construction.</p> <p>Contractor to coordinate response, clean up and disposal of material to approved site in accordance with environmental regulations and manufacturers /suppliers recommendations contained on the MSDS. Note: Emergency contact details and numbers are provided at Section 3.3 of this CEMP.</p>
Monitoring:	<p>As required by the circumstances of individual incidents</p>

Responsibility: WEPL or individual Contractors are responsible for the management of incidents arising from work under their control

WEPL or individual contractors are responsible for development of relevant environmental management and compliance plans for areas under their control personnel training implementation of emergency procedures.

Project Managers are responsible for day to day liaison and monitoring of contractor performance and compliance.

The Project EHS Advisor is responsible for co-ordinating the emergency response function, for providing guidance and advice where necessary, and for daily inspections and nonconformance reporting with weekly status reports to the Site Manager.

The Project Director /Site Manager shall be responsible for the allocation of appropriate resources and for reporting any incident which causes or threatens to cause material environmental harm or breaches licence or consent provisions.

Reporting: All parties are required to immediately notify the EHS Advisor of any environmental incident that may occur so that the incident is dealt with effectively and limit the potential for significant environmental harm.

Contractors are responsible for notifying the relevant Project Manager and EHS Advisor and for the prompt submission of any environmental incident or subsequent reports.

Project Managers are responsible monitoring and assisting in the incident report and investigation process.

The EHS Advisor is responsible for assisting and providing advice in relation to the investigation and preparation of reports and for briefing the Site Manager on all issues relating to the incident and investigation.

The Site Manager shall be responsible for reporting any incident which causes or threatens to cause material environmental harm or breaches licence or consent provisions to the EPA or designated local authority as per the EPA guidelines.

Corrective Action: In the event of a failure to comply with the CEMP guidelines, or a permit or licence condition, the relevant party shall:

Undertake an investigation in conjunction with the Section Manager and EHS Advisor to determine the cause of the problem;

Modify any work practices or procedures as necessary to improve emergency response and management; and

Formally report the outcomes of the investigation to the Site Manager.

The Site Manager shall notify the Director General of Planning, of any incidents.

Appendix E

Example Environmental Complaints Register

ENVIRONMENTAL COMPLAINTS RECORDING FORM

This Form is to be used to register details of any communications made by the general public, the media or the NSW Environmental Protection Agency in respect to any environmental complaints in regard to the Tomago WesTrac HQ stage 1 Project.

Date of Complaint

Time of Complaint

Nature of Complaint
(what is the environmental impact?)

Name of Complainant

Address

Phone No.

How Received

Investigation Officer

Investigations Carried
(include validity checks)

Cause of Problem

Action Taken

Resolution

Feedback to complainant

Appendix F

Example Daily Site Environmental Inspection Form

Daily Site Activity Diary Project Manager / EHS Adviser

<u>EHS Issues for yesterday/ today</u>
<u>EHS Incidents/ Accidents yesterday/ today:</u>
<u>Site Daily Walkthrough/inspection today:</u>
<u>Site Inductions today:</u>
<u>Site Visitors yesterday/today:</u>
<u>Weather for today:</u>
<u>Weather impact on site activities yesterday:</u>

Appendix G

Example Weekly Environmental Actions Checklist

WEEKLY ENVIRONMENTAL SITE INSPECTION

Contractor..... Date

To be completed at the commencement of each working week. Answer each item with a Yes (Y) or No (N) response in the Inspection Finding column. All "No" responses must be documented by a complete description of the issue or problem identified.

No.	Item	Inspection Finding (Y/N)	Issue/Problem
-----	------	--------------------------	---------------

Hazardous Materials

1	Containers are clearly labelled	Y	
2	Containers stored within a bund or roofed and fenced compound	Y	
3	Bunds free of cracks, water and spill liquids	Y	
4	Valves on bund drainage are locked shut	N/A	
5	Triple plate interceptors free of hydrocarbons	N/A	
6	MSDS's readily available	Y	
7	Spill kits have full list of equipment.	Y	
8	Hazardous areas clearly signed	Y	
9	Bunds free of litter (eg. wood, paper)	Y	

Site Drainage

1	Sediment traps are free of excess sediment	N/A	
2.	Silt fencing in good repair	N/A	
3.	Rock checks free of excess sediment	N/A	
4.	Drainage free of erosion & scouring	N/A	

Waste Management

1.	Bins have sufficient volume or are regularly emptied	Y	
----	--	---	--

- 2. Sufficient bins for each waste type Y
- 3. Bins correctly labelled Y
- 4. Waste batteries appropriately stored Y
- 5. Oily rags & oil filters recycled Y
- 6. No contamination of waste streams Y
- 7. Site is generally clean and free of rubbish Y

No.	Item	Inspection Finding (Y/N)	Issue/Problem
-----	------	--------------------------	---------------

Contamination

- | | | | |
|----|---|-----|--|
| 1. | Ground free of contamination (no oil stains) | Y | |
| 2. | Water surfaces free of oil sheen | N/A | |
| 3. | No oil leaks from tanks, mobile equip. generators | Y | |

General Issues

- | | | | |
|----|--|-----|--|
| 1. | Dust maintained to acceptable level | Y | |
| 2. | Machinery noises properly attenuated | Y | |
| 3. | Work areas clean and free of spillage | Y | |
| 4. | Site batters, roads free of erosion and scouring | N/A | |

Upon completion of actions

Signed
Inspector.....Date:.....

Signed Environmental
Representative.....Date:.....



WEEKLY ENVIRONMENTAL INSPECTIONS – ACTIONS LOG
ENVIRONMENTAL REPRESENTATIVE TO DETERMINE APPROPRIATE CORRECTIVE ACTIONS AND
FOLLOW UP TO CLOSE OUT

Item No.	Action Required	Required Completion Date	Person Responsible	Actual Completion Date
----------	-----------------	-----------------------------	-----------------------	------------------------------

Signed Inspector..... Date.....
Signed Environmental Representative..... Date.....



Appendix H

Example Monthly Environmental Audit & Report

Construction Environmental Management Plan (CEMP) Monthly Environmental Compliance and Audit Checklist

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Work Area:

Contractor:

DATE:

Report to be compiled monthly through review of weekly inspection reports and a field inspection by the Contractor Project Environmental Representative.

Tick Yes or No as required for compliance.

You MUST provide comment when a non-compliance is noted. * not checked – this item is not applicable or is not scheduled for auditing.

CEMP Management Programs and Other Targets	Compliance	Comments/Proposed Actions
	YES	NO
	(9) or not checked*	(9) and give comments)

Cultural Heritage

Are identified cultural heritage areas being left undisturbed?

Clearing and Topsoil Salvage

Has land clearance been limited to that which is absolutely necessary for construction activity to continue?

Have areas been remediated as soon as possible when no longer required for construction activity?

Is work area traffic confined to designated roads and tracks only?

Stormwater and Erosion Control

Are all permit and/or licence conditions satisfied?

Is clean stormwater diverted away from stockpiles, chemicals, and storage and construction areas?

Air Quality/Dust

Are all permit and/or licence conditions being met?

Are vehicle speed limits being adhered to?

Are adequate dust suppression methods being implemented for vehicles and machinery with the potential to create a dust nuisance?

Is monitoring being conducted as per licences and permits?

Noise

Are all permit and/or licence conditions being met?

Is regular maintenance of equipment occurring to attenuate excess noise?

Construction Environmental Management Plan (CEMP)

CEMP Management Programs and Other Targets	Compliance	Comments/Proposed Actions
	YES (9) or not checked*	NO (9) and give comments)

Are noisy construction activities being limited to the hours specified in relevant licenses and permits?

For noisy activities required outside the approved hours, has permission been obtained from the EPA, Local Council and local residents notified?

Is monitoring being conducted as per licences and permits?

Traffic

Are all permit and/or licence conditions being met?

Are vehicles maintaining a predominant use of accepted industrial routes and avoiding routes through residential areas?

Is only authorised transportation of materials and construction traffic being conducted on public roads?

Chemical, Fuel and Oil Storage and Handling

Are all permit and/or licence conditions being met?

Have all chemical, fuel and oil containers been clearly labelled?

Is storage of chemicals, fuels and oils complying with AS1940 – 1993?

Have all chemicals, fuels and oils entering site been accompanied with a suitable MSDS?

Is the MSDS register for all chemicals, fuels and oils kept up to date?

Are all chemical, fuel and oil containers of 205 litres or more stored in a bund with capacity of 110% of largest container?

Are all chemical, fuel and oil containers less than 205 litres stored as above or in a barricaded and roofed compound?

Is there a spill response kit at each primary chemical, fuel and oil storage location?

Waste Management

Are all permit and/or licence conditions being met?

Is waste being separated into non-hazardous and hazardous categories?

Are adequate numbers of fully labelled segregation receptacles provided for all wastes?

CEMP Management Programs and Other Targets	Compliance		Comments/Proposed Actions
	YES (9) or not checked*	NO (9) and give comments)	

Are all possible recyclable materials, including recyclable hazardous and non-hazardous wastes, are being recovered?

Are hazardous wastes being stored in a manner to prevent contamination of storm water?

Working Near or Over Water

Are all permit and/or licence conditions being met?

Are surface waters and soil clean of obvious oil or fuel contamination?

Emergency Incidents, Response and Contingency

Is an environmental incident register maintained?

Where a potential environmental impact was identified, were new procedures put in place to minimise future occurrences and are these procedures considered adequate?

Is fire control equipment, fire protection and spill clean up material provided near bulk fuel tanks and chemical storage areas?

Where valve outlets installed at bulk chemical, fuel and oil bunds, are lockable valves and signage in place?

Is regular awareness training in appropriate emergency response and spill clean up procedures being provided to all staff and contractors?

Inspections and Reporting

Have the weekly environmental inspections at all work areas been conducted?

Site Housekeeping

Is cleanup of all work areas being conducted on a regular basis?.

Signed Project Environmental Date Signed Contractor's Project Date

Construction Environmental Management Plan (CEMP)



Appendix I

Document Control and Transmission

RECEIPT OF THE CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN
(CEMP)
FOR
Tomago Project

I _____ acknowledge receipt of the above-mentioned
document and understand that the provisions outlined therein apply to all activities and
workers involved in construction on the site.

Signed _____ Date ____/____/____ Company
_____ Issuing Officer
_____ Date ____/____/____

