Henson Park Redevelopment

Construction Environmental Management Plan

Date: 23/05/24

CHANGE HISTORY

FREQUENCY OF REVIEW			
☐ Monthly	☑ Quarterly	☐ Annually	☐ Event: ……..

CONTENT AUTHOR	Robert Lacinski

ISSUE	CHANGE TYPE	AMENDMENT SUMMARY	AUTHOR	DATE
00	Rev 1	For client's review	RL	06/05/24
01	Rev 2	For client's review	RL	23/05/24
02	Rev 3	For client review	RL	06/06/24

SCHEDULE 3 (Clause Ref 3.5)

Environmental Management Plan

Who shall implement	Project Manager to prepare for implementation on site
When to implement	Each Project
How to use/implement	The Project Manager shall prepare and authorise for use the Project Environmental Management Plan EMP. In preparing the EMP, the Project Manager must: • insert names of Kane staff into the chart • detail consultation process • prepare environmental risk assessment and checklist • prepare incident response flowchart

CONTENTS

1 INTRODUCTION

The Kane Constructions Environmental Management System is third party certified to ISO 14001 and developed for functionality and use at construction site level. The system is designed so that when implemented, will assist in achieving the objectives of the Kane Environmental Management Policy.

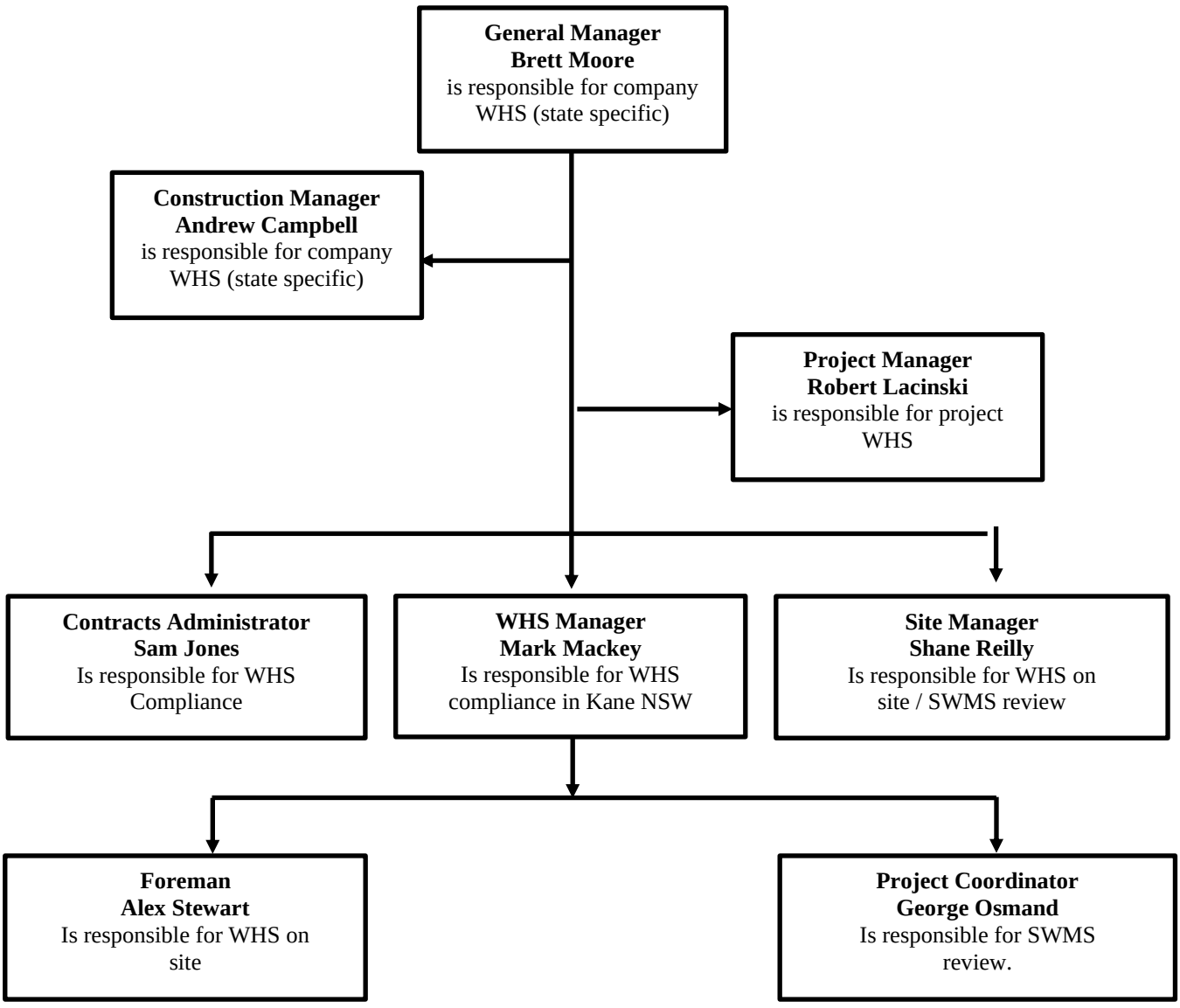
The Environmental Management Plan facilitates a systematic approach to site environmental management by applying the processes, checklists and forms of the Kane EMS to achieve compliance with relevant Environmental Legislation. When implemented on site, the checklists and forms of the Kane EMS become a record of project environmental management. We audit internally for compliance with the Kane EMS and randomly select sites for third party surveillance auditing for compliance with ISO 14001.

The Environmental Management Plan is developed to identify workplace environmental hazards, assess risks and implement control measures associated with activities, products and services over which Kane have control or influence.

The Kane project team is identified in the chart below. The project staff responsible for environmental management is assessed for competence, understanding and acceptance of the environmental responsibilities. Confirmation of this is provided – *refer Attachment 7*

1.1 Project Team Chart

PROJECT TEAM CHART



2 CONSULTATION AND COMMUNICATION

2.1 Site Induction

Before commencing work, all visitors must report to the site office for a site specific induction where employees and service providers are presented information contained in the Environmental Induction Booklet *(refer Attachment 3)*. Consultation and communication processes established are communicated at the site induction. All workers are encouraged to express their views on environmental issues direct to the Site Manager.

2.2 Currency and Awareness of Environmental Information

Kane Constructions seek Environmental advice and assistance and keep updated with changes to Environmental legislation, regulations and guidelines through the following (not limited to);

- Environmental Protection Authority Victoria
- Office of Environment and Heritage NSW
- Department of Environment and Resource Management QLD
- Department of the Environment, Climate Change, Energy and Water ACT
- Standards Australia Update emails etc.

During toolbox talks, the Site Manager shall communicate relevant alerts, newsletters, bulletins, results of audits, corrective actions etc. consistent with current activities on site. These shall be recorded using the OHSMS Schedule W-Record of Meeting proforma.

3 TRAINING AND COMPETENCY

3.1 Kane Staff

Kane Constructions ensures ongoing Environmental Management and Awareness training for all employees based on skill gaps. This targets the needs of individual people and relates appropriately to their roles and responsibilities. Certificates of competency are maintained in staff personnel files and available to validate competency upon request.

3.2 Non Kane Staff

The employer is responsible for providing their employees with the relevant training and supervision so they have the necessary competency and skills to undertake their responsibilities.

4 HAZARD IDENTIFICATION AND RISK CONTROL

4.1 Risk Assessment

An Environmental Risk Assessment and Checklist is prepared by the Project Manager to identify environmental aspects associated with the activities to be undertaken *(refer Attachment 2)*. The risk of those aspects occurring and causing environmental impact is rated, and control measures identified to reduce the risk.

The Site Manager is responsible for ensuring the control measures determined in the Environmental Risk Assessment and Checklist are implemented and remain effective. The aspects that have significant impact and assessed to be of higher risk must be given the highest order of priority.

5 ENVIRONMENTAL ASPECTS

5.1 Noise

Sources can be, but not limited to, in the forms of plant/machinery, radios and various construction methods. The Site Manager will ensure noise and vibration levels meet acceptable standards and statutory requirements.

The impact from noise on the surrounding areas shall be restricted to early construction activities undertaken until the building fabric is established further reducing noise impact on adjoining properties. A summary of these activities is detailed below:

Activity	Primary Equipment	Commentary
General Site Contouring	Skid Steer loader Excavator	Low to no impact on surrounding occupied buildings
Piling / Piering Works	Track Mounted CFA Boring Machine	As above
Bulk Earthworks	20, 32 Tonne Excavator 10t tipper	As above
Concrete Works	Hand held mechanical equipment Concrete Pump Vibrating Machine	Nil Impact as the works shall be non-continuous
Erection of Structural Steel	80 Tonne Crane	Nil Impact due to the nature of the activity
External Cladding	50 Tonne Crane Hand held Equipment Mobile Plant & Equipment	Nil Impact due to the nature of the activity

As detailed within this report “on site” noise assessments of specific equipment shall be undertaken throughout the course of the project to ensure that safe noise levels for both on site workers and adjoining residence and businesses are maintained. Local residence on the surrounding residences shall be notified by way of the site management team if particularly “noisy” activities are likely to continue for an extended period of time. The notification of this activities shall include the following and be conducted via a letterbox drop to the immediate adjoining neighbours at least 1 week prior to commencement of noisy milestones;

- Dates and Times of when the activities are likely to occur
- The expected duration of the works.
- Commentary regarding measures that have been undertaken to reduce the impact of likely noise (on site testing and monitoring, site awareness and staff inductions)
- Contact Phone and email address details of relevant Kane Management for consultation or queries

5.2 Dust

Disturbance of ground conditions, vehicle movement, dry powdery soils and stockpiled soils have potential to generate dust throughout the site. The Project Manager will identify sources and apply appropriate controls while the Site Manager will ensure the controls are managed effectively. Additionally, the Project Manager and Site Management team will follow all requirements listed by the engaged supervising environmental consultant to ensure the Remedial Action Plan (RAP) steps outlined for the dust management of contaminated PAH materials are ahead to.

Consideration will be given to the following control measures, to mitigate risk of dust emissions migrating beyond the
boundary of the remediation work area/s:

- Maintaining site access / egress stabilisation methods;
- Covering loads during site access / egressing;
- Covering stockpiles of contaminated soil that remain on site for greater than 24 hours;
- Use of water sprays in areas prone to dust generation, including excavation surfaces and fill material (during offloading and spreading);

- Establishing screens around the perimeter of remediation work area/s (e.g. application of shade cloth to fencing);
- Minimising soil excavation and/or handling during windy days; and
- Sweeping of accumulated soil on hardstand areas.

5.3 Waste

The accumulation of waste resulting from demolition works, construction works, packaging, office tasks and amenities will be managed accordingly by Kane and/or engaged subcontractors. The Site manager shall ensure facilities are provided to adequately dispose of all types of waste.

5.4 Chemicals

Various chemicals stored on site include but not limited to fuels, oil, paint and adhesives which may have an impact on the environment if not handled appropriately. The Site manager will ensure minimum quantities of chemicals are stored correctly on site and empty packaging is disposed of in accordance with state laws and regulations.

5.5 Land Contamination / Soil Contamination

Various activities may contribute to the contamination of land and soil including wash water, brick cutting and plaster. We understand that the location of Henson Park, Marrickville is contaminated with PAH and as such, strict controls must be in place.

A safe work procedure will be developed to reduce the potential for exposure of workers to the identified carcinogenic PAH contamination.
Kane is aware of the obligations under section 60 of the Contaminated Land Management Act 1997, regarding who is required to notify EPA as soon as practical after they become aware of contamination. As this has already been completed; and as the client is not the occupier or the owner of the site, any new identified contamination will be raised so that Inner West Council can consider its options and obligations under NSW EPA (2015).

Prior to works commencing, an exclusion zone is to be established by using physical barriers such as bollards, cones, tape or mesh. This will only occupy the minimum amount needed to safely contain/maintain the temporary stockpile location. This isolated zone will be locally fenced off as indicated on the site plan.
Appropriate signage is to be placed and tool box sessions will be conducted noting no eating, drinking, smoking; avoid contact with soil (wear gloves); wash hands and clothes after work and before eating or smoking around excavation/demolition areas. Lunchrooms, toilets and change rooms are available for all staff to comply with the above.

Figure A; Temporary stockpile location

As part of initial site set up, Kane will provide measures of area in question for stockpiling the material including before/after photographs of the proposed stockpile locations along with a detailed site plan demonstrating extent of proposed mound. During the course of excavation all excess material generated will be stockpiled into a temporary location following all the control measures noted in the HAZMAT remediation plan indicated by DRM. During this process Kane will invite the community, neighbouring residents and the Inner West Council for feedback on the capping location and its potential impact. To do this, Kane will place depth indicator pegs, placed in various areas to understand potential impact of the permanent capping mound. Upon completion of this consultation, a S4.55 will be submitted to council.

A stockpile location management will be implemented to prevent mixing of waste types, as the significant contaminant concentrations could cause contamination of cleaner soils, creating a greater volume of soils with an adverse soil classification. This will be the case for the proposed location of the stockpile due to previous capping material being located in this area. For example, prior to any excess contaminated spoil being generated, our contractors will have the environmental witness consultant (DRM) inspect the potential stockpile location. As this location is most likely where previous contamination material has been placed Kane will have it tested/deemed if its VENM material or contaminated. Upon this analysis there would be an option to carefully scrape back up to 200mm of this material, setting it aside prior to placement of any contaminated material to avoid unnecessary cross contamination. we will be placing the recently generated contaminated material carefully scaping back the 200mm of the 300mm existing VENM capping material and setting aside to avoid cross contamination prior to putting spoil material into the temporary stockpile location.

Site Assessment
We have begun by assessing the current site conditions, including the location of the spoil, terrain, access points, and any obstacles that may affect the relocation process. This has been completed through several visits to site and by the use of surveyed civil cross sections (mapping based off the surveyed levels). Kane are also in the process of engaging with community / council by providing a live mock up of the proposed location.

The project has established soil analysis surveys completed to date. These reports have identified elevated concentrations of carcinogenic polyaromatic hydrocarbons (PAH) in the fill materials across the site. DRM considered that the elevated PAH concentrations could pose an unacceptable risk to human health and that remediation is required to render the site suitable for ongoing use as Open Space Recreational land use. During the course of excavation, additional testing will be conducted as required for the certification of the stockpile mound to ensure that works are continuing in a safe, controlled and documented manner.

Excavation Volume Planning
We have conducted preliminary assessments of the total excess spoil volumes which include all bulk excavation, piling spoil and services spoil generated. This is expected to be approximately 1400m3. Because of the volumes involved, Kane have endeavoured to find the most suitable location at Henson Park with the options being quite limited due to the steep banks and nature of safely containing the contaminated material. Because of this Kane and our contractors suggest locating this stockpile in the flat section of the hill (as noted in Figure A above), with the intention to raise this area by around 1.5m from the existing levels while also keeping the same usability. Kane are also in the process of investigating the total volumes of the material generated and if it can be rationalised where possible. Dust control measure for this location will be inline with the items raised in section 5.2 of this report.

Equipment and Personnel
Kane will arrange for the necessary equipment and personnel for the safe and efficient excavation process. This includes excavators, dump trucks, bulldozers, and skilled operators which will relocate the stockpile from the rear of the grandstand to the capping stockpile location. During each spoil movement Kane will provide spotters and pedestrian traffic controllers to ensure that the public are always kept a safe distance away from any moving machinery.

Stockpile Work Zone
Upon understanding the final location of the capping stockpile. Kane will cordon off an area in the flat section of the hill side. This location will be used as the temporary stockpile location which will be added to during the course of our works. This location will be set-up to follow environmental, sediment control requirements and RAP (Remedial Action Plan) guidelines.

Capping location preparation: Kane will scrape the top 200mm of the clean fill located on the hill side and set this material aside for the future final capping. This will be completed to reduce the total clean material imports that may be required to satisfy the RAP requirements.

Capping
Kane will follow the recommendations outlined in the Remedial Action Plan (RAP) report and as recommended by the supervising environmental consultant for all temporary and final capping handling/storage of the spoil generated. All ongoing amendments to the final location or temporary location will be reviewed by all key stakeholders.

In the interim while we are generating excess spoil, Kane will relocate the spoil to the near the designated location on the flat section of the hill. This area will be separated from the public via fencing and warning signage. This fencing will also be set-back away from the driveway gate and away from adjoining structures to minimise disturbance. The temporary stockpile will have protective geofabric placed on-top of the mound and weighted down to keep the dust suppressed.

The topsoil will also be scraped back (capping layer) in preparation for future remedial work.
When the final capping volumes are nearing completion we will be guided by the RAP specialist who will supervise the placement of the contaminated fill. This area will then be covered with a protective layer of geotextile fabric and capped with or other approved materials to prevent erosion and contain any contaminants. This area will then be turfed.

Monitoring and Quality Assurance
Regularly monitor the relocated capping area (temporary and final) while Kane are on-site. This will occur on a daily basis as apart of the morning pre-start.

Due to the sensitive nature of the stockpile contents no adjustments or movements will be carried out during inclement weather events. Additionally, after each closing work day all stockpile locations will be covered and weighted down with geofabric to ensure dust sediment is controlled.

Documentation and Closure
Maintain detailed records of the relocation process once the project is completed.

5.6 Erosion and Sediment

Rain and/or water used on site over recently disturbed or bare areas of soils have potential to carry sediment off site and cause erosion impacting native vegetation and water courses. The Site Manager shall minimise the disturbance of vegetation to reduce the likelihood of sediment loss and erosion.

5.7 Flora / Fauna

Plant/machinery and various forms of construction work can impact negatively on surrounding flora and native vegetation. Protection of existing native vegetation from the impacts of construction work shall be implemented by the Site Manager.

When native fauna is encountered, it must not be disturbed. Notify the Site Manager if you see any fauna which is in the way of conducting work. Disturbing, injuring or killing native fauna without a permit may lead to prosecution.

5.8 Mud on Road

Vehicle movements after heavy rain events increase the risk of transferring mud and dirt onto public roads. The Site Manager shall put controls in place to ensure the risk of mud on roads is minimised.

Control measures include the use of the following;

- Restricted vehicle movement on inclement weather events
- Cattle grid for vehicles leaving the excavation zone to public roads
- Wheel wash down bays for vehicles leaving the excavation zone to public roads
-

5.9 Heritage Sites

Various forms of construction work including demolition can have an impact of the cultural heritage of an existing building or site. The heritage significance of the building shall be determined by the Project Manager and the Site Manager shall ensure agreed protection methods are implemented on site.

During the course of our works there is a risk of damage or impact to the heritage identified structures at Henson park. Because of this, Kane will put in place strict control measures to ensure that vehicle movements are away from these structures, that no heritage items are worked on, adjusted or touched without prior approval from a heritage consultant and that any construction activity that may cause damage to this structure (i.e concrete mixing) is kept at a safe distance away from these elements.

5.10 Air Pollution

Poor plant maintenance and exhaust emissions will impact the quality of the air. The Site Manager shall ensure that incoming plant is assessed and confirmed to be maintained in accordance with manufacturer's recommendations.

During demolition and excavation dust generation should be controlled by dust suppression methods that dampen the dust generated. I.e mist spraying around dust generation activities.

Other sources of air contaminants shall be contained and managed appropriately throughout the project.

A half–face respirator (fitted with organic cartridges) or dust-masks should be available for use if significant odours or dust is generated during the works.

PAH Specific air pollution monitoring shall be conducted if odours are detected at the site boundary & stockpile location during remediation works, monitoring of those odours may be undertaken, using methods suited to the odour type, based on recommendations from a suitably experienced odour consultant (if required).

6 SYSTEM IMPLEMENTATION AND RESPONSIBILITIES

Site staff have responsibility for implementation of the following site specific Environmental Management system procedures and related Kane Business Management System procedures. Responsibilities listed below must be read in conjunction with the Kane EMS responsibilities (refer Clause 3.1). The priority, order and timeframes in which the items below are implemented may differ as determined by the Project Manager to suit the project construction programme and the findings of the environmental risk assessment.

Project Specific Systems	**Corporate Responsibility**	**Individual Responsibility**
1. Include Environmental Management as a fixed agenda item of meetings	Kane	Kane PM, CM, CA
2. Develop the Environmental Management Plan EMP and all attachments	Kane	PM
3. Deliver Site Induction (including policy, controls, incident response)	Kane	SM
4. Implement the environmental controls identified in the EMP	Kane and Subcontractors	SM, Subcontractor Supervisor
5. Implement Incident Response procedure (where incidents occur)	Kane and Subcontractors	SM, Subcontractor Supervisor
6. Raise Non-conformance reports and initiate corrective and preventative action	Kane and Subcontractors	SM, Subcontractor Supervisor
7. Communicate alerts, incidents etc via Toolbox Meetings	Kane and Subcontractors	SM, Subcontractor Supervisor
8. Update site noticeboard with material waste data sheets	Kane	SM
9. Monitor and evaluate environmental controls (document weekly)	Kane and Subcontractors	SM, Subcontractor Supervisor
10. Measure and evaluate the effectiveness of the EMP	Kane	PM

7 INCIDENT NOTIFICATION, INVESTIGATION AND RESPONSE

7.1 Incident notification

All site employees are responsible for notifying the Site Manager if they witness a pollution incident including leak, spill or escape of a substance or pollution incident causing or threatening public or property harm. In the event of an incident, the clean-up process shall be managed under the direct supervision of the Site Manager. The Site Manager is responsible for reporting notifiable incidents to the relevant environmental authority, Kane Senior Management and the Client Emergency Contacts in accordance with Attachment 4 Incident Response Flowchart.

7.2 Investigation and action taken

Procedural and/or legislative Non-conformances are identified, investigated, corrected and prevented by raising an Improvement Notice (refer Attachment 5). When raised, Kane Site Management documents the non-conformance and recommendation on how to correct the non-conformance. The Improvement Notice recipient is required to document the action taken to rescind the notice. Kane Site Management determines if the rectification is complete and adequate to prevent recurrence.

If the incident is of a large magnitude and poses high risk, the Site Manager shall contact and allow emergency services to manage the clean-up process. Such incidents shall be investigated using Kane OHSMS Schedule M/2 - Incident Investigation to determine how the incident occurred, how to prevent recurrence and how procedures may require revision to improve preparedness and response. The findings of an investigation are reviewed by the Construction Director, Systems Manager, Systems Coordinator, and Construction Supervisor NSW/QLD with a view to disseminating the lessons learnt to all projects.

8 AUDITING AND FREQUENCY

8.1 Internal

Quarterly Audit Report (refer Attachment 7) is used by the Project Manager to audit effective implementation of the Kane EMS. Points are awarded for effective implementation and points taken where noncompliance is observed. The audit facilitates recognising good practice environmental management and requires actions be documented where improvement is necessary. Each site is audited quarterly (minimum) close to the end of each reporting period on a day determined by the Project Manager. The audit report is issued to the Systems Manager for VIC projects or Construction Supervisor for NSW/QLD projects to review against company objectives/targets and identify trends that may appear (positive and negative). The audits are scheduled at the end of the following months (or otherwise scheduled to avoid holiday and extremely busy periods i.e. lead up to Christmas)

- March (Jan – Mar)
- June (Apr – Jun)
- September (Jul – Sept)
- December (Oct – Dec)

Random EMS audits are undertaken by the Systems Manager/Coordinator (VIC) and Construction Supervisor (NSW/QLD). Reports are prepared and distributed to all staff on the project for actioning and for information to the Directors in each state.

8.2 External

Kane Constructions certification to ISO 14001 – Environmental Management requires third party surveillance audits be undertaken. Projects are selected randomly. Each audit confirms if the company certification should remain. Corrective action must be promptly closed where identified.

It is not uncommon for head contracts to require external audits of projects. The auditor is commonly required to have Lead Auditor competency. Audit frequency and reporting requirements differ based on project complexity and risks.

9 ATTACHMENTS

Attachment	Document Title	Document Number	Revision
1	Schedule of Acts, Regulations, Standards and Codes of Practice	EMS-SYS-SCH3-ATT1	A2
2	Risk Assessment and Checklist	EMS-SYS-SCH3-ATT2	A2
3	Environmental Induction	EMS-SYS-SCH3-ATT3	A2
4	Incident Response Flowchart	EMS-SYS-SCH3-ATT4	A2
5	Improvement Notice	EMS-SYS-SCH3-ATT5	A2
6	Quarterly Audit Report	EMS-SYS-SCH3-ATT6	A2
7	Confirmation of Responsibilities	EMS-SYS-SCH3-ATT7	A2

The below table identifies the documents associated with this EMP, however are integrated with and presented in the Kane Occupational Health and Safety Management System.

Document Title	Document Description	Document Number	Kane OHS / BMS Reference
Skills Register	Register of training /competency	OHS-SYS-SCHD	OHS Schedule D
Post Tender Interview	Contract document detailing environmental management obligations of all subcontractors engaged	NA	Section 8.26
Incident Investigation	Form completed for the purposes of investigating incidents	OHS-SYS-SCHM2	OHS Schedule M2
Site Induction Record	Form completed by all inductees detailing personal and employment details	OHS-SYS-SCHP	OHS Schedule P
Record of Consultation	Form used to record consultation / communication	OHS-SYS-SCHW	OHS Schedule W

ATTACHMENT 1

Schedule of Acts, Regulations, Standards and Codes of Practice

Who shall implement	Construction Director/Secretary All Project Staff site	- Maintain currency of documentation - Ensure availability of publications for the use on
When to implement	Bi Annually As required	- Maintain Currency - Provide documentation
How to use/implement	The list of publications is available to confirming legal obligations / best practice controls / guidance material for works on site. All *Commonwealth* legislation applies across Australia. All other legislation is relevant to the state of NSW.	

Publication	**Source**
Acts **<u>Environment Protection</u>** Protection of the Environment Administration Act 1991 National Environment Protection Council (NSW) Act 1995 Protection of the Environment Operations Act 1997 Smoke Free Environment Act 2000 Contaminated Land Management Act 1997 **<u>Planning and Environmental Impact Assessment</u>** Waste Avoidance and Resource Recovery Act 2001 Commonwealth Environment Protection (Impact of Proposals) Act 1974 Environment Protection and Biodiversity Conservation Act 1999 ***(Commonwealth)*** **<u>Heritage and Other Land Protection Legislation</u>** National Parks and Wildlife Act 1974 **<u>Other Acts with Potential to Affect Construction Activities</u>** Health Administration Act 1982 Road and Rail Transport (Dangerous Goods) Act 1997 Water Act 2007 ***(Commonwealth)***	NSW Legislation and Parliamentary Document Website http://www.legislation.nsw.gov.au/ Search using title OR Commonwealth Legislation Website http://www.comlaw.gov.au/Home Search using title

Publication	Source
Regulations Protection of the Environment Administration Regulation 2007 Protection of the Environment Operations (Clean Air) Regulation 2010 Protection of the Environment Operations (General) Regulation 2009 Protection of the Environment Operations (Noise Control) Regulation 2008 Protection of the Environment Operations (Waste) Regulation 2005 Smoke-Free Environment Regulations 2007	NSW Legislation and Parliamentary Document Website http://www.legislation.nsw.gov.au/ Search using title
Office of Environment and Heritage Publications and Guidelines Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW Managing Urban Stormwater – Harvesting and Re-Use – Soil and Construction Environmental Management on the Urban Fringe – **Economic incentives for environmental management** – **Property management plan** – **Environmental assessment** Storing and Handling Liquids: Environmental Protection - Participants Manual Interim Construction Noise Guideline *Review of alternatives to 'beeper alarms' for construction equipment* Assessing Vibration: A Technical Guideline Land Contamination: What are my Responsibilities? (Website only)	NSW Government – Office of Environment and Heritage Website http://www.environment.nsw.gov.au/ Search using title http://www.environment.nsw.gov.au/clm/index.htm
Other Standards and Guidelines **ISO** ASNZS ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing ISO 14001:2004 – Environmental Management Systems **Biodiversity** The National Strategy for the Conservation of Australia's Biological Diversity 1996 The NSW Biodiversity DRAFT Strategy	Copy available in Head Office – Contact the Construction Assistant http://www.environment.gov.au/biodiversity/publications/strategy/index.html http://www.environment.nsw.gov.au/biodiversity/nswbiostrategy.htm

Publication	Source
Australian Government Department of Defence Defence Environmental Strategic Plan 2010-2014	Department of Defence Infrastructure Management Website http://www.defence.gov.au/environment/ems.htm

ATTACHMENT 2

Risk Assessment and Checklist

ATTACHMENT 2 - ENVIRONMENTAL RISK ASSESSMENT and CHECKLIST (Cl 3.5.1)

ASSESS RISK RATING IN ACCORDANCE WITH THE BELOW RISK CLASSIFICATION TABLE

Determine the RATING for each aspect (including any site specific) after consideration of the standard risk controls

After implementation of the standard risk controls, is there:

• Potential for pollution resulting in long term damage • Potential for pollution that cannot be mitigated immediately • A specific contract requirement • A specific permit requirement • A specific authority requirement	**H - HIGH**	**Additional risk controls required. Frequency of monitoring to be based on level of risk**
• Minimal potential for public or other complaint • Minimal potential for pollution (mitigated with minor damage)	**M - MEDIUM**	**Monitor weekly to ensure controls are effective (may require increased monitoring based on inspections)**
• No potential for public or other complaints • No potential for a legal breach • No specific contract requirement • No specific permit requirement • No specific authority requirement	**L - LOW**	**No additional risk controls. Monitor weekly**

Job No.	**Job Title: Henson Park Re-development**
Prepared By : **Robert Lacinski**	**Position : Project Manager** **Date Approved: 06/05/24** **Sign :**
Date of Review: **Review Number**	**Risk Review undertaken by (list names / company);** – **Robert Lacinski** – **Sam Jones** – **Shane Reilly** – **George Osmand**

No	ASPECTS	SOURCE	STANDARD RISK CONTROLS	Residual Risk Rating (H, M, L)	Additional Risk Controls Required (where risk rating is H)	No. of Compliant Controls Observed	No. of Non-Compliant Controls Observed	Minor Actions Required [Improvement Notice (Attachment 5) to be raised where significant Non-compliance is observed]	Initial and Date when action Completed
1	Noise	Plant / Machinery Construction Methods Radios	• Plant /machinery maintained in accordance with manufacturer recommendations • ~~Silencers placed on large compressors / generators~~ • Comply with council work hours – – 7:00am to 6.00pm, Mondays to Fridays, inclusive (with demolition works finishing at 5pm). – 8:00am to 1:00pm on Saturdays – No time on Sundays or public holidays • Limit volume of radios • Utilise prefabricated materials	L	N/A	Refer to Enviro Walk	Refer to Enviro Walk	N/A	
2	Dust	Ground disturbance Vehicle Movement Dry powdery soils	• Clean & Sweep area where required with Vac Truck /Vacuum • Cover exposed ground with mulch or other suitable material • Restrict vehicle movements • Dust Suppression • ~~Landscape and re-vegetate as soon as possible~~ • Cover soil stockpiles with plastic • ~~Special, high quality hoarding which meets infection control standards installed for operational healthcare facilities~~	L	N/A	Refer to Enviro Walk	Refer to Enviro Walk	N/A	
3	Waste	Demolition Construction Works Packaging Office Amenities	• Utilise separate recycle bins for paper, steel etc (space permitting on site) • Use bin contractors who sort and recycle construction waste • ~~Utilise existing client facilities for domestic recyclables (paper, cans etc)~~ • Recycle demolished materials wherever possible • Place lids on domestic waste bins for odour and vermin control • Utilise concrete wash out area • Concrete waste to be utilised for levelling uneven surfaces present on Lot 2 adjacent to work area • Additional concrete waste will be broken up into manageable portion sizes.	L	N/A	Refer to Enviro Walk	Refer to Enviro Walk	N/A	
4	Chemicals	Fuel Oil Paint Adhesives	• No bulk storage of fuel / oil on site (~~fuel tankers to visit site as required~~) • Paints, adhesives stored on site at minimum quantities in vented containers/rooms • All storage of chemicals shall comply with the Material Safety Data Sheet • Major servicing of plant e.g. where large quantities of oil requires changing shall be undertaken off site – Via Kane permit to work	L	N/A	Refer to Enviro Walk	Refer to Enviro Walk	N/A	
5	Contamination (from slurry / wash water) & Soil Contamination	Paint Plaster Concrete Brick / Paver cutting	• ~~Use paint wash trough. Settled solids should be removed by an appropriate waste disposal company~~ • Designate a washing up and brick cutting area away from stormwater drains. Build an earth bund to contain wash water from concrete, plaster, brick cutting • Designate a washing up and brick cutting area away from stormwater drains. Build an earth bund to contain wash water from concrete, plaster, brick cutting • Documented evidence of contaminated soil removed from site is accepted by landfill facility – EPA NSW	L	N/A	Refer to Enviro Walk	Refer to Enviro Walk	N/A	
6	Erosion and Sediment	Disturbed / cleared soils Rain events	• Protect and maintain natural vegetation and minimise clearing / disturbance • Connect downpipes to stormwater drainage as soon as possible or pipe roof water onto grassed areas • Install sediment fences close to the site boundary and drains where surface water may carry sediment off site • Place gravel sausages across pit openings / Cattle grid to Arundel St	L	N/A	Refer to Enviro Walk	Refer to Enviro Walk	N/A	
7	Mud on Road	Muddy site Vehicle Movements Significant Rain Event	• Crushed rock placed in areas of vehicle movement • Restrict vehicle movements on un-vegetated/exposed ground • Cover exposed trafficked ground with mulch or other suitable material • Protect areas of vegetation and minimise clearing / disturbance • Remove water from site ~~by connecting downpipes to stormwater drainage~~ • Install rumble strips at site exit to promote cleaning mud off vehicle tyres	L	N/A	Refer to Enviro Walk	Refer to Enviro Walk	N/A	

8	Heritage Sites	Demolition Construction Works	• Project documentation to be closely reviewed for areas of Heritage significance • Any Heritage significance to be identified during site induction • Agreed protection measures to be included in the work method statement	L	N/A	Refer to Enviro Walk	Refer to Enviro Walk	N/A	
9	Air Pollution	Plant / Machinery	• Plant / machinery maintained in accordance with manufacturer recommendations • Plant / machinery exhaust emissions monitored for smoke (should not observe continuous smoke for longer than 10 seconds)	L	N/A	Refer to Enviro Walk	Refer to Enviro Walk	N/A	
Total Compliant and Non-compliant Observed			• **This Week**						
					Total Compliant and Non-compliant Observed			**Since Project Started**	

ATTACHMENT 3

Environmental Induction Booklet

ATTACHMENT 3 (Clause 3.5.2)

Environmental Induction Booklet

Environment Policy	All personnel (Kane Constructions and Subcontractors) must be committed to achieving the objectives of Kane's Environment Policy. The policy is posted on the noticeboard or induction room for all inductees to read

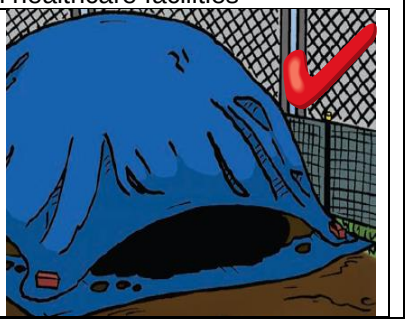
Incident Response	All site employees are responsible for notifying the Site Manager if they witness a pollution incident including leak, spill escape of a substance or pollution incident causing or threatening public or property harm

Waste Data Sheets	The Site Noticeboard is updated as required with Material Waste Data Sheets (good practice environmental control information) for all to read

NOISE	**Source** • Plant / Machinery • Construction Methods • Radios • Unnecessary
	**Risk Controls** • Plant /machinery maintained in accordance with manufacturer recommendations • Silencers placed on large compressors / generators • Comply with council work hours • Limit volume of radios • Utilise prefabricated materials

DUST	**Source** • Ground disturbance • Vehicle Movement • Dry powdery soils • Cutting • Infection Control
	**Risk Controls** • Protect areas of vegetation and minimise clearing / disturbance • Cover exposed ground with mulch or other suitable material • Restrict vehicle movements • Dampen surfaces (seek approval where water restrictions apply) • Landscape and re-vegetate as soon as possible • Seed or cover soil stockpiles

- Special, high quality hoarding which meets infection control standards installed for operational healthcare facilities



WASTE

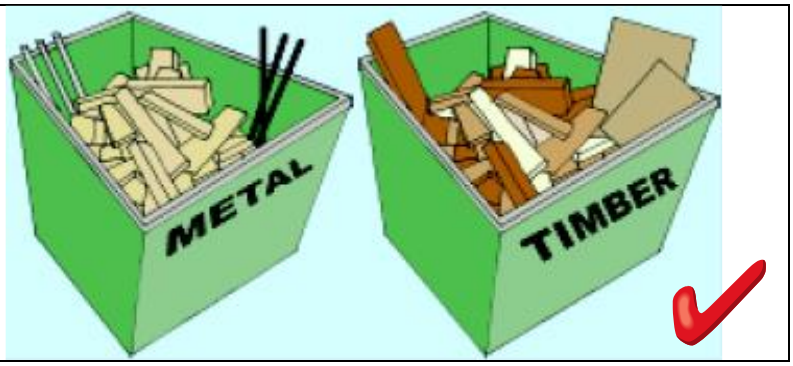
Source

- Demolition
- Construction Works
- Packaging
- Office
- Amenities

Risk Controls

- Utilise separate recycle bins for paper, steel etc (space permitting on site)
- Use bin contractors who sort and recycle construction waste
- Utilise existing client facilities for domestic recyclables (paper, cans etc)
- Recycle demolished materials wherever possible
- Place lids on domestic waste bins for odour and vermin control

RECYCLE



CHEMICALS

Source

- Fuel
- Oil
- Paint
- Adhesives

Risk Controls

- No bulk storage of fuel / oil on site (fuel tankers to visit site as required)
- Paints, adhesives stored on site at minimum quantities in vented containers/rooms
- All storage of chemicals shall comply with the Material Safety Data Sheet
- Major servicing of plant e.g. where large quantities of oil requires changing shall be undertaken off site

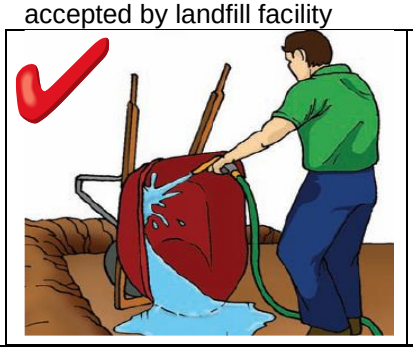
CONTAMINATION (FROM SLURRY/ WASHWATER)

Source

- Paint
- Plaster
- Concrete
- Brick / Tile / Paver cutting

Risk Controls

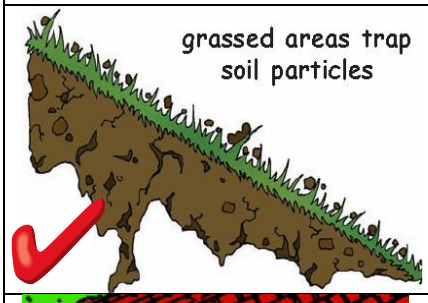
- Use paint wash trough. Settled solids should be removed by an appropriate waste disposal company
- Designate a washing up and brick cutting area away from stormwater drains. Build an earth bund to contain wash water from concrete, plaster, brick cutting
- Designate a washing up and brick cutting area away from stormwater drains. Build an earth bund to contain wash water from concrete, plaster, brick cutting
- Documented evidence of contaminated soil removed from site is accepted by landfill facility



EROSION AND SEDIMENT

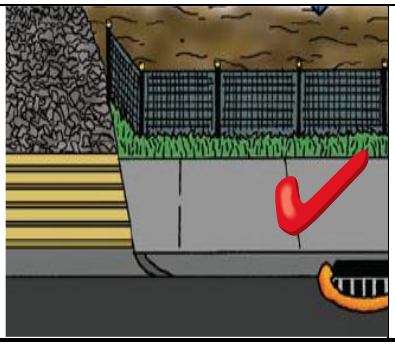
Source

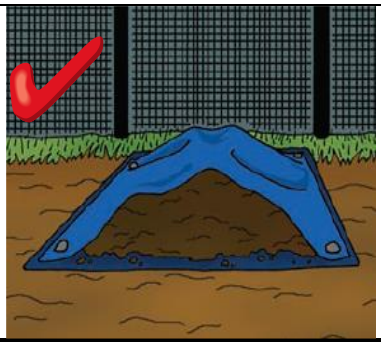
- Disturbed / cleared soils
- Rain events



Risk Controls

- Protect and maintain natural vegetation and minimise clearing / disturbance
- Connect downpipes to stormwater drainage as soon as possible or pipe roof water onto grassed areas
- Install sediment fences close to the site boundary and drains where surface water may carry sediment off site
- Place gravel sausages across pit openings





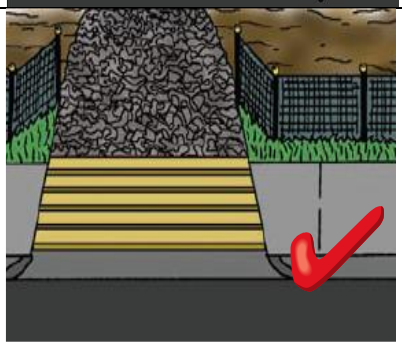
MUD ON ROAD

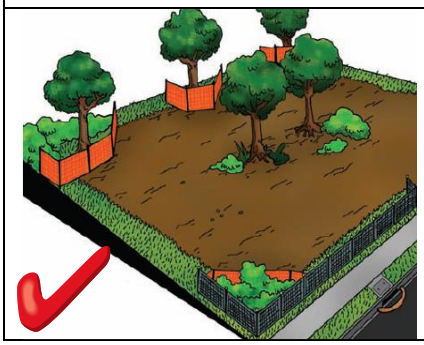
Source

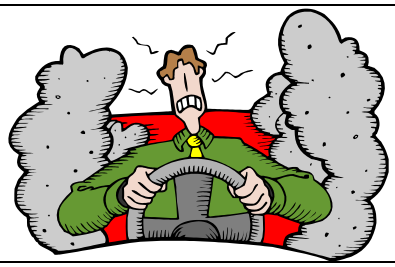
- Muddy site
- Vehicle Movements
- Significant Rain Event

Risk Controls

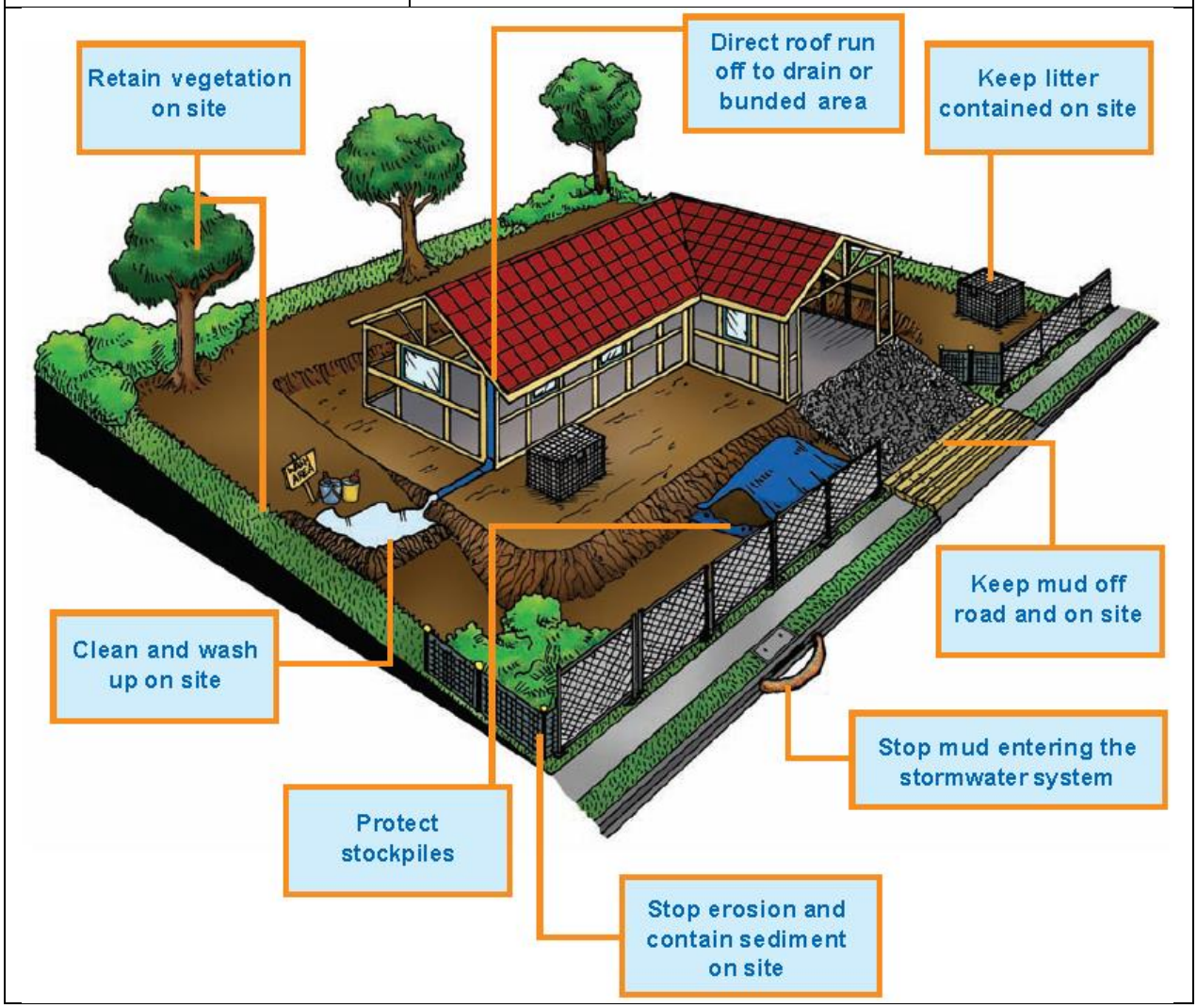
- Crushed rock placed in areas of vehicle movement
- Restrict vehicle movements on un-vegetated/exposed ground
- Cover exposed trafficked ground with mulch or other suitable material
- Protect areas of vegetation and minimise clearing / disturbance
- Remove water from site by connecting downpipes to stormwater drainage
- Install rumble strips at site exit to promote cleaning mud off vehicle tyres



FLORA / FAUNA	Source
	• Plant / Machinery • Construction Works
	**Risk Controls** • Trees, shrubs etc is protected by flagging, roped off i.e."No Go Zone" • Vehicles parked outside of tree root zone to avoid damage • No entry to fenced off areas, no pets on sites, stick to access roads, and notify Site Manager of any fauna

AIR POLLUTION	Source
	• Plant / Machinery
	**Risk Controls** • Plant / machinery maintained in accordance with manufacturer recommendations • Plant / machinery exhaust emissions monitored for smoke (should not observe continuous smoke for longer than 10 seconds)

SUMMARY	Risk Controls



ATTACHMENT 4

Incident Response Flowchart

ATTACHMENT 4 (Clause 3.5.3)

Incident Response NSW

New South Wales

Organisations operating under the Office of Environment and Heritage (OEH) issued environmental licences are required to notify pollution incidents by calling the OEH Pollution Watch Line.

Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

- Protection of the Environment Operations Act 1997 (links are to the NSW legislation website):
    - Section 116: It is an offence to willfully or negligently cause any substance to leak, spill in a manner that harms or is likely to harm the environment.
    - Section 120: It is illegal to pollute or cause or permit pollution of waters.
    - Section 124-126 Businesses must maintain and operate equipment and deal with materials in a proper and efficient manner to prevent air pollution at all times.
    - Section 139 and 140: It is an offence to allow noise from your premises to be generated as a result of the failure to maintain or operate machinery.
    - Section 142: It is an offence to pollute land
    - section 147: Meaning of material harm to the environment
    - section 148: Pollution incidents causing or threatening material harm to the environment
    - section 149: Manner and form of notification
    - section 150: Relevant information to be given
    - section 151: Incidents not required to be reported
    - section 152: Offence for breaching duty to notify pollution incidents
    - section 153: Incriminating information

The OEH relies on everyone in the community to report pollution. The community is encouraged to call the OEH Pollution Watch Line when the following is noticed:

- Smoke or odours from an industry or business
- Spills or slicks in waterways
- Illegal dumping of wastes
- Noise from a factory or industrial complex
- Littering
- Smokey Vehicles

OEH POLLUTION WATCH LINE

Metropolitan – 131 555 (24 hours)

All site employees are responsible for notifying the Site Manager if they witness a pollution incident including leak, spill escape of a substance or pollution incident causing or threatening public or property harm. When notified, the Site Manager shall implement the attached Incident Response Flowchart.

In the event of an ENVIRONMENTAL INCIDENT

(all types of incidents) notify the Site Manager

NOTIFY THE SITE MANAGER IMMEDIATELY

Name - Shane Reilly

Mobile - 0423737227

Is the pollution incident (including leak, spill escape of a substance &/or other pollution incident) causing or threatening public health, property or environment harm?

YES

CALL 000 (FIRE BRIGADE)

NOTIFY OEH POLLUTION LINE on 131 555 (24hrs)

Kane site team to notify Kane Senior Management

NO

Emergency Services & OEH Notification is **NOT required.**

Clean-up to be managed under the direct supervision of the Site Manager

Kane to notify Client emergency contacts of the incident as follows:

a) Project Manager - Robert Lacinski 0404702632

b) Superintendent - Sean Gilchrist 043228438

ATTACHMENT 5

Improvement Notice

ATTACHMENT 5 (Clause 3.5)

Improvement Notice

This notice is issued as a consequence of your failure to maintain adequate environmental controls during the performance of your contract works

PROJECT – Henson Grandstand Redevelopment	**PROJECT NO. 2650**
SITE MANAGER – Shane Reilly	**DATE:**

TO: ..... Company Name

FROM: ..... Company Name

❑	Noise	❑	Dust
❑	Waste	❑	Chemicals
❑	Contamination (slurry, wash water, oil)	❑	Erosion and Sediment
❑	Flora / Fauna	❑	Mud on road
❑	Heritage	❑	Air Pollution
❑	Other	❑	

Where this Improvement Notice is issued as a result of an environmental incident,

IDENTIFY ACTION TAKEN TO CLEAN UP

ACTION TAKEN TO ELIMINATE THE CAUSE (i.e re-induction, improved control measure etc)

VERIFICATION OF ACTION TAKEN (Kane Site Management use only)

☐ Action verified as completed

☐ Action inadequate (describe why inadequate)

.....

.....

Signed: .....

Date:.....
Kane Representative

In the event the company issued this notice fails to action, all costs incurred to undertake these works will be back-charged.

☐ Labour to Rectify

men x hours = Total Hours

Distribution:
☐Site File
☐Project Manager
☐Subcontractor

ATTACHMENT 6

Quarterly Audit Report

ATTACHMENT 6 (Clause 4.1.2)

Environmental Management Audit

Who shall implement	Project Manager (Auditor) - Audit and submit report Site Manager (Auditee) - Implement actions identified
When to implement	Quarterly (minimum)
How to use/implement	Project Manager to check compliance, with the Site Manager, of all items against actual site record/observations and score out of 150. If not applicable, write N/A and award total points. Do not award negative points. Lowest score possible is zero. Any issue identified shall be listed *(immediate actions required column)* and actioned by the Site Manager *(sign and date in the closed column)*. The report is to be issued to the Systems Manager (Vic) or Construction Supervisor (NSW/QLD).

Job Title: Henson Park Grandstand Redevelopment		**Period Audited**
Site Manager: Shane Reilly	**Job No. 2650**	**Date Audited**

*** if not applicable write N/A and award total points**

EMS Sch / CL Ref	Audit Criteria	* Points Scored	Immediate Actions Required	Closed Sign/Date
Sch 1B	1. All EMS (body and schedules) implemented on site is the most current revisions i.e check documents against revision control table *(Award 15 points, less 2 points for each document not current)*			
Sch 3	2. Environmental Management Plan is signed, dated and prepared using current revision *(15 points if signed, dated and current. Less 10 points if not signed and dated. Zero points if not current revision used)*			
Sch 3 Att 2	3. Environmental Risk Assessment and Checklist prepared *(15 points if prepared, less 10 points if not signed and dated by PM, less 10 points if risk rating is not completed, less 5 points if names of attendees not listed, zero points if not prepared)*			
Sch 3 Att 2	4. Environmental Risk Assessment implementation *(15 points for completed weekly checks, less 10 points for weeks not completed, zero points for no implementation)*			
Sch 3 Att 2	5. Tally of Compliant / Non-Compliant Controls Maintained *(5 points, less 2 points if tally not updated, zero points if no tally)*			
Sch 3 Att 2	6. Environmental Risk Assessment minor actions required *(10 points for minor actions required and closed out, less 2 points each action not closed out)*			
Sch 3 Att 3	7. Environmental Induction Booklet displayed in induction room *(10 points for induction book displayed, zero points if not displayed)*			

EMS Sch / CL Ref	Audit Criteria	* Points Scored	Immediate Actions Required	Closed Sign/Date
Sch 3 Att 4	8. Incident Response Flowchart completed with Site manager's name and displayed on site noticeboard *(10 points if completed and displayed, less 5 points for not displaying on the noticeboard and zero points if not completed)*			
Sch 3 Att 5	9. Improvement notices raised and closed out *(20 points for notices closed out, less 10 points for each notice raised and not closed out)*			
Sch 4	10. Materials Waste Data Sheets displayed on site notice board relevant to stage of project works *(10 points, less 2 points for each data sheet not relevant to works)*			
Sch 3 Att 6	11. Quarterly environmental reporting statistics are submitted by the requested date *(15 points, less 10 points if not submitted on time)*			
Sch 3 Att 6	12. Are issues/actions repeated from previous audits? *(10 points, less 10 points if answered Yes without an explanation why the issues/actions are repeated from previous audits)*	Yes/No	If Yes, list the reasons why the issues/actions are not actioned from previous audits	
4.1.2	13. Is the Kane EMS effective in achieving the objectives and targets? *(10 points, less 10 points if answered No without an explanation why the system is not effective)*	Yes/No	If No, list why *(i.e system change, training etc)*	

Total Points achieved	maximum score 160	**Date Immediate Actions must be closed by**	write date above

If maximum points are <u>not achieved</u> on the Audit Criteria 1 and 2 above, the Total Points achieved for this audit shall default to "Improvement Required"

If maximum points are <u>not achieved</u> on the Audit Criteria 3, 4 and 6 above, the Total Points achieved for this audit shall default to "Unsatisfactory Result"

Between 90 - 100% (144 – 160) Points	**Kane EMS trainer/mentor suitable to train young foreman**
Between 70 – 89 % (112 – 143) Points	**Good Implementation (above average implementation)**
Between 50 – 69 % (80 – 111) Points	**Improvement Required (average implementation)**
Below 50 % (0 – 79) Points	**Unsatisfactory result (Non-conformance report and re-induction)**

Print Name …… (Site Manager)

Print Name…… (Project Manager)

<u>Distribution</u>
Site File
Systems Manager/Systems Coordinator (VIC)/Construction Supervisor (NSW, QLD)

ATTACHMENT 7

Confirmation of Responsibilities

ATTACHMENT 7

Confirmation of Responsibilities

The project staff responsible for management of environmental management is assessed for competence, understanding and acceptance of their environmental responsibilities. Confirmation of this is provided below.

Each individual shall complete the table to verify the items listed below. Write either Yes or No (alongside the item in your column only) sign and date.

Item 1 I understand my responsibilities identified in the Kane EMS (revision A2)
Item 2 I understand my responsibilities identified in the Environmental Management Plan (revision 1)
Item 3 I was consulted and given opportunity for input in the development of this Environmental Management Plan
Item 4 I am competent to carry out my responsibilities identified in the Kane EMS and this Environmental Management Plan
Item 5 I will carry out my responsibilities identified in the Kane EMS and this Environmental Management Plan

	Project Manager	**Site Manager**	**Contract Administrator**	**Foreman**	**Project Co-ordinator**	
Name	Robert Lacinski	Shane Reilly	Sam Jones	TBA	George Osmand	
Item 1 (yes/ no)	Yes	Yes	Yes	Yes	Yes	
Item 2 (yes/ no)	Yes	Yes	Yes	Yes	Yes	
Item 3 (yes/ no)	Yes	Yes	Yes	Yes	Yes	
Item 4 (yes/ no)	Yes	Yes	Yes	Yes	Yes	
Item 5 (yes/ no)	Yes	Yes	Yes	Yes	Yes	
Sign						
Date						

R – Responsible
A – Accountable
C – Consulted
I – Informed