Northern Beaches Hospital Connectivity and Network Enhancement Project

Stage 1-Six Monthly Compliance Report: June 2016 - February 2017

Stage 2-Six Monthly Compliance Report: July 2016 – February 2017

Document No: NBHRDC-EN-EPL-PLN_2

<table>
<thead>
<tr>
<th>Revision</th>
<th>Revision Date</th>
<th>Prepared by (Name and Title)</th>
<th>Reviewed by (Name and Title)</th>
<th>Authorisation (Name and Title)</th>
<th>Authorisation Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>May 17</td>
<td>Jeremy Slattery Environmental Consultant</td>
<td>Cam Weller Director</td>
<td>Project Director</td>
<td></td>
</tr>
<tr>
<td>0</td>
<td>June 17</td>
<td>Jeremy Slattery Environmental Consultant</td>
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</tr>
</tbody>
</table>
CONTENTS

Acronyms and Abbreviations........................................................................................................4
1. Introduction .............................................................................................................................5
2. Project .....................................................................................................................................5
3. Project description ..................................................................................................................6
   3.1 Project overview ................................................................................................................6
4. Project Management ..............................................................................................................8
5. Environmental Management System Overview .................................................................8
6. Compliance Tracking Program requirements ......................................................................9
   6.1 Scope of the activities undertaken during the reporting period – Stage 1 .........................9
   6.2 Scope of the activities undertaken during the reporting period – Stage 2 .........................9
   6.3 Ancillary Facility Approvals ............................................................................................10
   6.4 Environmental Training ..................................................................................................10
   6.5 Sustainability ....................................................................................................................10
   6.6 Performance of environmental controls .........................................................................10
   6.7 Non-compliances during the reporting period ................................................................11
   6.7.1 Reportable Incidents ..................................................................................................11
   6.8 Incidents recorded and actions taken ..............................................................................13
   6.9 Monitoring and review of compliance against relevant criteria ......................................14
   6.10 Audits and inspections ...................................................................................................15
   6.11 Environmental complaints ............................................................................................16
   6.12 Compliance with the Stage 1 Project Approvals and RSMMs .........................................17
ACRONYMS AND ABBREVIATIONS

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CEMP</td>
<td>Construction environmental management plan</td>
</tr>
<tr>
<td>CoA</td>
<td>Condition of approval</td>
</tr>
<tr>
<td>CTP</td>
<td>Compliance Tracking Program</td>
</tr>
<tr>
<td>DP&amp;E</td>
<td>Department of Planning and Environment</td>
</tr>
<tr>
<td>EIS</td>
<td>Environmental Impact Statement</td>
</tr>
<tr>
<td>EPA</td>
<td>NSW Environment Protection Authority</td>
</tr>
<tr>
<td>EMS</td>
<td>Environmental management system</td>
</tr>
<tr>
<td>Environmental Audit</td>
<td>Verification of how implementation is proceeding with respect to the Project Deed, AS/NZS ISO 14001:2004, CEMP and environmental documents such as CoA</td>
</tr>
<tr>
<td>Environmental Incident</td>
<td>An unexpected event that has, or has the potential to, cause harm to the environment and requires some action to minimise the impact or restore the environment.</td>
</tr>
<tr>
<td>Environmental Representative (ER)</td>
<td>A suitably qualified and experienced person independent of project design and construction personnel employed for the duration of construction. The principal point of advice in relation to all questions and complaints concerning environmental performance.</td>
</tr>
<tr>
<td>EP&amp;A Act</td>
<td>Environmental Planning and Assessment Act 1979</td>
</tr>
<tr>
<td>EPL</td>
<td>Environment Protection Licence</td>
</tr>
<tr>
<td>ERG</td>
<td>Environmental Review Group – comprising representatives of RMS, Environmental Representative, Project delivery team, regulatory authorities (EPA, OEH) and Warringah Council. The ERG will be maintained for the duration of the Project and will meet monthly. The role the ERG is to provide proactive advice on environmental management issues and review the environmental performance of the Project.</td>
</tr>
<tr>
<td>FYJV</td>
<td>Ferrovial York Joint Venture</td>
</tr>
<tr>
<td>Minister, the</td>
<td>Minister for Planning</td>
</tr>
<tr>
<td>Non-compliance</td>
<td>Failure to comply with the requirements of the Project approvals or any applicable license, permit or legal requirements.</td>
</tr>
<tr>
<td>Non-conformance</td>
<td>Failure to conform to the requirements of Project system documentation including this CEMP or supporting documentation.</td>
</tr>
<tr>
<td>OEH</td>
<td>Office of Environment and Heritage</td>
</tr>
<tr>
<td>Project, the</td>
<td>Northern Beaches Hospital – Connectivity and Network Enhancements:</td>
</tr>
<tr>
<td></td>
<td>- Stage 1 – Hospital Connectivity Enhancement Works; and</td>
</tr>
<tr>
<td></td>
<td>- Stage 2 – Network Enhancement Works.</td>
</tr>
<tr>
<td>RMS</td>
<td>Roads and Maritime Services</td>
</tr>
<tr>
<td>Secretary</td>
<td>Secretary of the NSW Department of Planning and Environment (or delegate)</td>
</tr>
</tbody>
</table>
1. **INTRODUCTION**

This Construction Compliance Report – Stage 1 & 2 (Stage 1&2 CCR) required under condition A11(c)(ii) of Infrastructure Approval SSI-6434 and SSI-6622 has been prepared covering the six-monthly reporting period from June 2016 to February 2017 to address the requirements of the Concept and Project Conditions of Approval (CoA) and the Revised Safeguards and Management Measures (RSMM) of the Concept and Project Submissions Report / Preferred Infrastructure Report.

On 14 February 2017 the Project wrote to DPE requesting that the Construction Compliance Report required under condition A11(c)(ii) of Infrastructure Approval SSI-6434 and SSI-6622 be submitted as one document at six monthly intervals after February and August each year.

As per the agreement and Approval by DPE that this approach is an efficient way to deliver the Construction Compliance Report for the entire project, this single report addresses the Stage 1 and stage 2 Compliance for the NBHRC Project.

The body of this report addresses the aspects of both Stages 1 and 2. Appendix A – D present the project compliance against each of the CoA and RMMS for the Project for each stage individually.

2. **PROJECT**

The Northern Beaches Hospital – Connectivity and Network Enhancements Project (the Project), comprises road upgrades to enhance connectivity of the existing road network surrounding the Northern Beaches Hospital at Frenchs Forest within Sydney’s Northern Beaches.

Roads and Maritime is planning and delivering the road upgrades in two stages as shown in Figure 1-1. Stage 1 of the Project was granted planning approval on 29th June 2015 and approved for construction in November 2015. Stage 2 was granted planning approval on 25th February 2016 and approved for construction in August 2016.

In accordance with Stage 1 and 2 Project Conditions of Approval (CoA) A11, a Compliance Tracking Program (CTP) was prepared for the Project, and was provided as Appendix A9 of the Stage 1 and 2 CEMP. As part of the CTP, Construction Compliance Reports must be prepared at six monthly intervals following commencement of construction and subsequent submission timeframes to be directed by the Secretary if necessary, following review of the Reports for the duration of construction.
3. PROJECT DESCRIPTION

3.1 Project overview

The Northern Beaches Hospital – Connectivity and Network Enhancements Project (the Project) comprises road upgrades to enhance connectivity of the existing road network surrounding the Northern Beaches Hospital at Frenchs Forest, within the Warringah local government area (LGA) on Sydney’s Northern Beaches.

Roads and Maritime Services (RMS) is planning and delivering the road upgrades in two stages:

- The Stage 1 Project Hospital Connectivity Works which aim to enhance the existing road network to facilitate the opening of the proposed Northern Beaches Hospital by 2018.

- Stage 2 Project Network Enhancement Works which are directed towards broader network capacity enhancement particularly along Warringah Road.

The Project has been determined as State Significant Infrastructure (SSI) under section 115U (2) of the EP&A Act, and subject to assessment under Part 5.1 of the EP&A Act. The Minister for Planning granted approval for the Concept Plan and Stage 1 Project on 29 June 2015. Approval for Stage 2 was granted on 25 February 2016. The key features of Stage 1 & Stage 2 of the Project which is the subject of this Consistency Assessment comprise:
- widening and intersection upgrades along sections of Forest Way between about 100 metres north of Warringah Road to south of Adams Street;
- upgrade of the existing bus stop fronting the Forest Way Shopping Centre on Forest Way, to accommodate two buses within the bay;
- widening of Naree Road, Frenchs Forest Road West and a section of Frenchs Forest Road East from the Wakehurst Parkway intersection to Allambie Road;
- provision of traffic signals with pedestrian crossings at Naree Road and Forest Way; at Naree Road, Frenchs Forest Road West and Rabbett Street; on Frenchs Forest Road West at a new access to the hospital opposite Gladys Avenue; at Frenchs Forest Road East and Romford Road; and at Frenchs Forest Road East, Patanga Road and Allambie Road;
- provision of dedicated curb side bus lanes along approaches and departures to the Frenchs Forest Road intersection with Wakehurst Parkway;
- widening and upgrades to the intersection of Frenchs Forest Road and Wakehurst Parkway;
- widening of the Wakehurst Parkway from about 330 metres north of the intersection with Frenchs Forest Road to the intersection with Warringah Road;
- widening of Allambie Road to the north of the intersection with Warringah Road;
- widening and upgrade to the Warringah Road and Allambie Road (north) intersection; and
- widening of Warringah Road west of Allambie Road for about 700 metres just to the east of Courtley Road.
- the removal and replacement of the existing pedestrian overbridge across Warringah Road west of the intersection of Forest Way.
- widening of Wakehurst Parkway from the intersection with Warringah Road to south of Aquatic Drive.
- upgrades to Warringah Road and its intersection with Forest Way, Hilmer Street and Wakehurst Parkway at surface level to provide for all traffic movements and provide for subsurface grade separated through traffic.
- provision of four through lanes on Warringah Road (two lanes in each direction for east-west through traffic) within a grade separated open ‘slot’ (or underpass) for about 1.3 kilometres. Ingress and egress points from and to the slot include: - Western extent – Warringah Road near Fitzpatrick Avenue East - Eastern extent – Warringah Road from about 350 metres east of the Wakehurst Parkway grade separated intersection - Provision of a two-lane on-ramp (merging into one lane) from Wakehurst Parkway (southbound) into the slot (westbound).
- widening of Warringah Road from west of Fitzpatrick Avenue East to west of Allambie Road to include surface level lanes for the length of the project as follows:
  - westbound travel lanes on the southern side of the Warringah Road corridor
  - eastbound travel lanes on the northern side of the Warringah Road corridor (generally using existing road pavement)
- the intersections of Warringah Road with Forest Way, Hilmer Street and Wakehurst Parkway to form a surface level bridge over the slot to provide for traffic movements at surface level and allow east-west through traffic in the slot to pass beneath uninterrupted
• upgrades or adjustments to existing intersections of Warringah Road with Fitzpatrick Avenue East, Rodborough Road and Allambie Road
• widening of Wakehurst Parkway from the intersection of Warringah Road to south of Aquatic Drive
• provision of a new connection at Aquatic Drive including right in from Wakehurst Parkway (northbound), left in from Wakehurst Parkway (southbound) and left out from Aquatic Drive onto Wakehurst Parkway (southbound)
• provision of shared (pedestrian and cyclist) bridges at the following locations: - Across Warringah Road west of the intersection of Forest Way (removal and replacement of the existing pedestrian bridge) - Across Warringah Road on the western side of the intersection with Hilmer Street (new pedestrian bridge).
• removal of the existing pedestrian crossing across Warringah Road at Hilmer Street
• shared paths and footpaths on sections of Warringah Road, Wakehurst Parkway, Forest Way, Aquatic Drive and Allambie Road.

Both Stage 1 and Stage 2 Project work would also include drainage works, landscaping, property acquisition and adjustments, utility relocations (which may be required to extend into surrounding streets), as well as ancillary works during construction. The ancillary works would include but not be limited to construction compounds, sedimentation basins, and stockpile sites. This would tie in at either end with the shared path proposed by Warringah Council. The scope of the Stage 2 Project would not include ongoing maintenance work.

The Project will be delivered under a design and construct (D&C) contract awarded by to the Ferrovial York Joint Venture (FYJV) on 15 June 2015.

For the purposes of this environmental assessment, the concept design described and assessed in the Project EIS and consequently approved by the Minister, is referred to as the Approved Project.

4. PROJECT MANAGEMENT

The Project is being designed and constructed in a joint venture consisting of Ferrovial Agroman (Australia) Pty Ltd and York Civil (FYJV), with overall project management and supervision of the project by Roads and Maritime Services (RMS).

Ferrovial York Joint Venture (FYJV) and RMS are jointly responsible for compliance with the CoAs and RSMMs.

5. ENVIRONMENTAL MANAGEMENT SYSTEM OVERVIEW

The Construction Environmental Management Plan (CEMP) is the primary system to manage and control the environmental aspects of the Project during pre-construction and construction. It provides the overall framework for the system and procedures to ensure environmental impacts are minimised and legislative and other requirements are fulfilled.

The strategies defined in the CEMP have been developed with consideration of the conditions in the Stage 1 Project Approvals, safeguards and mitigation measures presented in the environmental assessment and approval documents. The CEMP establishes the system for implementation, monitoring and continuous improvement to minimise impacts from the Project on the environment.
The CTP and this Stage 1 CCR is part of the suite of environmental management documents prepared for the Project which are administered by the Environmental Manager, or delegate, for the duration of the Project.

6. COMPLIANCE TRACKING PROGRAM REQUIREMENTS

As per Stage 1 CoA A11(a) [Stage 2 CoA A11(c)], this Stage 1 and 2 CCR serves as notification to the Secretary of the status of compliance of construction in meeting the requirements specified in the Concept and Stage 1 and 2 CoAs and the SPIR RSMMs as a six-monthly reporting cycle following the commencement of Stage 1 construction.

6.1 Scope of the activities undertaken during the reporting period – Stage 1

During July – December 2016, Stage 1 and 2 construction for the Project has seen the following activities started and progressed towards completion:

- Potholing, trenching and directional drilling of utility services along Frenchs Forest Road (east and west), Forest Way, Allambie Road and Warringah Road.
- Property works in the Forest High School and stormwater drainage installation
- Utilities relocation including all providers.
- Storm water drainage and earthworks
- Retaining wall construction
- The installation of the new Telstra underground relocation works along the west verge of Forest Way in Area C2 will continue.
- Implementing closure of one traffic lane along Forest Way.
- Property works in the Forest High School will continue.
- Stormwater drainage along Rabbett Street is scheduled to continue during this period.
- Installation of the stormwater drainage along the south verge in Area B
- Commencing the HP Gas Main
- Commenced road widening works in Forest Way East Area C2, Area D1 / D2 Warringah Road and Allambie Road Widening and Area D4 North verge FFRE East of Patanga.
- Opening up to traffic of the new Southbound slip lane in Area A2
- Road widening works on the South side of FFRW Area B and continuing with road widening works Forest Way East Area C2, Area D1 / D2 and D4.
- Property works in the Forest High School
- The widening works to the South Side Frenchs Forest Road West

6.2 Scope of the activities undertaken during the reporting period – Stage 2

During July – December 2016, Stage 2 construction for the Project has seen the following activities started and progressed towards completion:

- Clearing and grubbing, contamination removal, noise walls, start of earthworks on Warringah road westbound, and retaining walls 9 and 5 (capping beam)
- The installation of the noise wall panels at the rear of Karingal Crescent.
- Bulk earthworks
- Soil nail and shotcrete operation to retaining wall 2RW-05-WB
- The installation of the temporary bridging for Forest Way Pedestrian bridge east diversion
• Stormwater drainage.
• Micro tunnelling for the stormwater outlet from the Slot
• Retaining wall construction 2RW-05-WB in Area A3 will be complete this period.
• Superstructure works for Forest Way and Hilmer Street pedestrian bridges

6.3 Ancillary Facility Approvals

As part of the Project, it is necessary to establish site compounds and other ancillary facilities to facilitate construction. Under the Stage 1 and Stage 2 Conditions of Approval (CoA), the new ancillary facilities have to be assessed and approved by the Department of Planning and Environment (DP&E). The following compounds and ancillary facilities have been approved:

• Corner of Dreadnought Road and Wakehurst Parkway Oxford Falls.
• 500 Warringah Road, Frenchs Forest.

6.4 Environmental Training

In accordance with Section 5.1 of the CEMP, all personnel, including employees, contractors, sub-contractors, have attend a compulsory environmental site induction prior to commencement on-site. The induction included:

• relevant details of the CEMP including purpose and objectives;
• key environmental issues;
• conditions of environmental licences, permits and approvals;
• specific environmental management requirements and responsibilities;
• mitigation measures for the control of environmental issues;
• incident response and reporting requirements; and
• information relating to the location of environmental constraints.

A record of all environment inductions are maintained within the Project Comply-Flow system and kept on-site. The Project also conducted a CEMP on-boarding session each month. Environmental representatives continue to present the environmental component of the induction three days a week and toolbox talks continued in line with the work fronts and in response to on-site issues. Comply flow training was conducted and the Project commenced trials of using the inspection application for the Environment section.

6.5 Sustainability

The Project met with AECOM to close-out the interim design rating information to prepare for submission to ISCA. A meeting with ISCA is also proposed in early February 2017.

6.6 Performance of environmental controls

Key environmental controls have included:

• Fencing, flagging and sign-posting of project boundaries and no-go areas
• Erosion and sedimentation controls in accordance with implementation of PESCP developed by the Project soil conservationist. Controls include diversion drains, bunding, silt fencing and drainage filters, and a sediment basin installed within the main site compound to contain and treat stormwater water collected within trenches and pits during utility works and other construction trenching works
• Portable noise mats to suppress noise from mobile plant and equipment
• Soil binders for dust suppression of temporary spoil stockpiles
• Mobile water carts and sprinklers for dust suppression of cleared areas

In general the above environmental controls have effectively managed construction activities to avoid major environmental pollution impacts or detrimental impacts to surrounding environmental values. Specific case points of active management of environmental controls:

• ERSED controls have been upgraded in response to the recent audit and continue to be maintained across the wider Project. The Soil Conservationist frequency on-site is now weekly, instead of fortnightly to align with the current work program.
• Dust minimisation and management activities have been a focus to reduce impacts at receivers.
• Out of Hours Work’s continue to be planned and executed. The Forest Way activities continued as per the restrictions under the EPL.
• Weekly, Pre- and Post- rainfall inspections conducted across the Project as per CEMP and sub plans.
• Ongoing monitoring of works (such as noise, air quality and water) conducted.
• ERSED controls have been progressively installed and updated across Stage 2 as the project continues earthwork activities. Dust minimisation and management activities have been a focus to reduce impacts at receivers.
• Stage 1 ESCP’s continue to be updated as the works progress. Area A1 and A2 were a key area of focus due to the proximity of receivers and scale of works undertaken in this area.
• New drainage fronts (A3, Cobb and Patanga) were opened with ERSED being at the forefront of contractors minds. Methodology and execution of Area A4 works were also subject of investigations.
• Preparation of the site for shutdown activities were key with the project progressively treating inactive work fronts with polymer and other controls.
• Ongoing monitoring of works (such as noise, air quality and water) conducted.
• Remediation works have been completed at the 7/11 and Bantry Bay site.

6.7 Non-compliances during the reporting period

Non-conformance is the failure or refusal to comply with the requirements of this CEMP and supporting documentation. Where a non-compliance has been identified, a corrective / preventative action (or actions) will be implemented.

6.7.1 Reportable Incidents

Within the last 6 months there have been 4 notifications to the Project from the EPA.
<table>
<thead>
<tr>
<th>EPL condition number</th>
<th>Type of non-compliance</th>
<th>EPA actions</th>
<th>FYJV Response and Close-out</th>
</tr>
</thead>
<tbody>
<tr>
<td>L4.6</td>
<td>Unplanned OOHW delivery of road profiler which was not notified due to subcontracting to a third party. Plant parked up until commencement as per notification. Plant times and locations reconfirmed and demobilised as per notification.</td>
<td>Appropriate Action taken by licensee</td>
<td>OOH requirements captured in project contracts and communicated to subcontractors.</td>
</tr>
<tr>
<td>L4.5</td>
<td>Project worked four nights in a row instead of specified three due to lack of clarity to night team. Project-wide toolbox to raise awareness of noise catchment areas &amp; importance of compliance. Works ceased in area for week to provide respite.</td>
<td>EPA has written to licensee regarding non-compliance and relevant action</td>
<td>Project wide toolbox to reaffirm OOHW compliance OOHW process amended for additional cross-checking of compliance and clarity.</td>
</tr>
<tr>
<td>A2.2</td>
<td>Drilling material entered a redundant and unknown stormwater pipe due to not being appropriately capped when decommissioned. Sediment laden water entered Trefoil Creek. EPA notified. PIRMP activated. Clean-up activities completed.</td>
<td>Penalty Notice issued</td>
<td>All future underboring contractors to provide detailed frac out management plans to address a number site specific conditions.</td>
</tr>
</tbody>
</table>

On September 2nd, 2016, the Project was presented with Penalty Notice #3085780134 from the EPA for a Contravention of the condition of EPL licence 20673. This was for an underbore incident offence on 5th May 2016. The EPA also handed down a decision of no further action on September 2nd, 2016 for a similar underbore associated offence in April which the Project was awaiting an outcome on.

On January 17th, 2017, the Project was issued a Notice of Preventive Action (Notice # 1548318) as a result of two inspections over a month where an EPA officer was unsatisfied with the Project’s erosion and sediment prevention controls. Preventive Action was requested to be completed by January 31st, 2017, with confirmation of these actions. The Project responded and confirmed actions within a letter sent to the EPA on January 31st 2017 and accepted by the EPA and the issue closed.
### Incidents recorded and actions taken

<table>
<thead>
<tr>
<th>#</th>
<th>Summary</th>
<th>Date</th>
<th>Remedial Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>001</td>
<td>Significant Rainfall</td>
<td>6/6/2016</td>
<td>Additional labour arranged and sucker truck engaged to site clean-up and maintenance of ERSED controls</td>
</tr>
<tr>
<td>002</td>
<td>Discharge without permit</td>
<td>8/6/2016</td>
<td>Toolbox held regarding permits for dewatering to ensure site is aware of commitments</td>
</tr>
<tr>
<td>003</td>
<td>Material being placed in clean water diversions.</td>
<td>09/08/16</td>
<td>Controls were immediately reinstated upon discovery. Weekly site inspections with a member of the at fault subcontractor</td>
</tr>
<tr>
<td>004</td>
<td>Out of hours works being conducted</td>
<td>31/8/2016</td>
<td>Project wide toolbox to reaffirm OOHW compliance OOHW process amended for additional cross-checking of compliance and clarity.</td>
</tr>
<tr>
<td>005</td>
<td>A category two incident which involved a hydraulic hose rupture on the Project which was promptly cleaned up.</td>
<td>6/10/16</td>
<td>Spill kit used and material cleaned up and disposed appropriately. Toolbox by site on refuelling rolled out to site.</td>
</tr>
<tr>
<td>006</td>
<td>A category one incident related to four consecutive nights being worked out of hours in noise catchment eleven which contravened condition L4.5.</td>
<td>14/10/16</td>
<td>The Project has investigated this issue and supplied the incident report to EPA. EPA have subsequently issued a warning letter to the Project on 31 October 2016 to which FYJV closed out all action with 14 days as requested by the EPA.</td>
</tr>
<tr>
<td>007</td>
<td>A category two incident which involved Excavator Leak</td>
<td>24/10/16</td>
<td>Leak promptly cleaned up.</td>
</tr>
<tr>
<td>008</td>
<td>A category two incident which involved a hydraulic hose rupture</td>
<td>17/11/16</td>
<td>Spillkit was utilised to absorb hydraulic oil, contaminated material was appropriately removed.</td>
</tr>
<tr>
<td>009</td>
<td>Absent erosion and sediment controls in an area which had been cleared, identified during the Environmental Review Group inspection.</td>
<td>12/16</td>
<td>This was addressed immediately following it being identified in the inspection.</td>
</tr>
<tr>
<td>#</td>
<td>Summary</td>
<td>Date</td>
<td>Remedial Action</td>
</tr>
<tr>
<td>----</td>
<td>-------------------------------------------------------------------------</td>
<td>-------</td>
<td>--------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>010</td>
<td>A minor spill on-site</td>
<td>12/16</td>
<td>Promptly cleaned up once identified.</td>
</tr>
<tr>
<td>011</td>
<td>The incident involved dust generation from soil nail activities which was identified with the EPA onsite.</td>
<td>01/17</td>
<td>This was addressed immediately however, triggered a show cause notice from the regulator. The Project has responded to this.</td>
</tr>
<tr>
<td>012</td>
<td>Two minor spills on-site</td>
<td></td>
<td>Promptly cleaned up once identified.</td>
</tr>
<tr>
<td>013</td>
<td>A preventative notice was issued to the Project which required an audit of erosion and sediment controls.</td>
<td>01/17</td>
<td>The Project has undertaken the audit as required under this document and required close out actions.</td>
</tr>
</tbody>
</table>

### 6.9 Monitoring and review of compliance against relevant criteria

Monitoring for the project has been consistently carried out monthly and addressing the following parameters:

- Surface Water Monitoring
- Baseline groundwater monitoring
- Noise Monitoring
- Basin Discharge
- Air quality monitoring
- Vibration monitoring
- Road Kill Monitoring

Dust monitoring has shown compliance to requirements and criteria prescribed in the AQMP in all months but November-December 2016. Further investigation found that these exceedances were as a result of tampering and extreme high winds and bushfires in the local area.

Although noise monitoring has shown compliance with noise predictions and compliance with Out of Hours Working protocol, some complaints have been received, which have been subsequently addressed (refer to section 5.4).

Water quality discharge monitoring has shown compliance to EPL discharge criteria. Surface water quality monitoring has also been conducted for the Project which has occurred on a monthly basis and every quarter following a rainfall event. The only exceedances for the past 6 months have been in regards to zinc level exceedances in surface water monitoring. Whilst some low level exceedances have been detected, they have not been attributed to the Project.
• December and November surface water monitoring recorded exceedances in zinc and copper for both wet and dry periods.
• October no exceedances were recorded and it was noted that results in SW 5 identified an improvement in zinc levels which have typically exceeded criterion.
• In September one exceedance was identified in SW 5 for Zinc which was 0.002 over trigger levels but within median values.

Two causes were subsequently identified:
- Catchment exceedances within the data set historically collected. These levels typically fell outside the mean but within the range collected; or
- Exceedances from external sources. Such examples included zinc and copper in SW 5. The elevated level of zinc could be attributed to high voltage cable installation by external parties, potential manufacturing processes and waste water being released to watercourses during high rainfall events.

Baseline groundwater monitoring continued during this period to inform the preparation of the Stage 2 Water Management Plan.

Ecological monitoring conducted as part of Stage 1 focused on pre-clearance activities, identification of habitat features and undertaking a two stage tree removal process when hollow bearing trees were involved. Relocation of some fauna was required although this was successfully undertaken in neighbouring habitat.

Roadkill monitoring was undertaken throughout this period as required by the Ecological Monitoring Program. There were no recorded road kills.

6.10 Audits and inspections

Parsons Brinkerhoff are employed by the client to act as the Project verifier (PV). The PV have been engaged, amongst other tasks, to conduct a monthly audit of the Project. Over the course of the period covered by this compliance report, there have been 6 PV audits.

In addition to the PV, FYJV has an independent Environmental Representative who attends fortnightly to conduct site audits with an open invitation to Government regulators to attend on a monthly basis. This invitation has been taken up on occasion by DPE, EPA, NBC and Soil Conservation representatives.

Regular fortnightly inspections by the ER and RMS Environment Branch representative, have identified minor house-keeping matters which included:

• Erosion and Sediment Control maintenance and adequacy of controls in response to site changes.
• Adequacy of rehabilitation activities following geotechnical activities prior to substantial earthwork activities across the site.
• Dust management.
• Vehicle tracking.

Each of these matters raised during inspections were immediately rectified.
The Environmental Representative has also undertaken inspections of the site during programmed night works to confirm mitigation and management processes are in place as per the out of hours approvals.

<table>
<thead>
<tr>
<th>Audit Type</th>
<th>Attendees</th>
<th>Audit Date</th>
<th>Audit findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>PV</td>
<td>PV, FYJV, RMS</td>
<td>29-11-2016</td>
<td>1 Corrective Action</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4 Observations of Concern</td>
</tr>
<tr>
<td>Internal</td>
<td>FYJV</td>
<td>13-9-2016</td>
<td>1 minor Non-compliance</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3 improvement opportunities</td>
</tr>
<tr>
<td>Biodiversity Performance Review</td>
<td>PV, RMS, FYJV, Biosis (Project Ecologist)</td>
<td>28-9-2016</td>
<td>3 Recommendations</td>
</tr>
<tr>
<td>Erosion and Sediment control performance audit</td>
<td>Soil Conservationist</td>
<td>24/25-1-2017</td>
<td>The audit did not identify significant departures from the erosion and sediment guidelines however, a number of actions which required close out.</td>
</tr>
<tr>
<td>Fortnightly RMS/ER Inspection</td>
<td>RMS, ER, FYJV</td>
<td>Fortnightly</td>
<td>The Project continued to address items as identified in these inspections.</td>
</tr>
<tr>
<td>ERG</td>
<td>EPA, NBC, ER, RMS, DPE, FYJV</td>
<td>Monthly</td>
<td>The Project continued to address items as identified in these inspections.</td>
</tr>
<tr>
<td>Site shut down inspections</td>
<td>FYJV, RMS</td>
<td>As required</td>
<td>The Project continued to address items as identified in these inspections.</td>
</tr>
</tbody>
</table>

### 6.11 Environmental complaints

<table>
<thead>
<tr>
<th>Month</th>
<th># of Complaints</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>July</td>
<td>1</td>
<td>OOHW Noise</td>
</tr>
<tr>
<td>August</td>
<td>2</td>
<td>Dust</td>
</tr>
<tr>
<td>September</td>
<td>4</td>
<td>Noise Dust</td>
</tr>
<tr>
<td>October</td>
<td>9</td>
<td>Noise Dust</td>
</tr>
<tr>
<td>November</td>
<td>3</td>
<td>OOHW</td>
</tr>
</tbody>
</table>
Thirty environmental complaints have been received in the reporting period. Complaints have overwhelmingly been related to noise associated with out of hours works. Complaints have been also received in relation to dust.

Noise complaints have arisen from programmed out of hours working as a consequence of works not being able to be conducted during the day period due to Road Occupancy Licences not being permitted for the day period.

The staging of night-time activities were programmed, assessed and monitored in accordance with the NVM and Out of Hours Working Protocol. Noise mitigation measures were implemented where possible. While activities were monitored and shown to comply with predicted noise levels, the inherent noisy nature of these activities had given rise to complaints.

All noise complaints received were responded to within 24 hours and have been closed out.

The main activities contributing to noise complaints during night-time activity have been completed.

All complaints are recorded and tracked within the Project Consultation Manager system.

6.12 **Compliance with the Stage 1 Project Approvals and RSMMs**

The six monthly report on compliance with the Stage 1&2 Project Approvals and RSMMs are provided in:

- Appendix A - summary of Concept and Stage 1 Project compliance against the Conditions of Approval
- Appendix B - summary of the Concept and Stage 1 compliance against each of the RSMMs from the Concept and Stage 1 SPIR.
- Appendix C - summary of Concept and Stage 2 Project compliance against the Conditions of Approval
- Appendix D - summary of the Concept and Stage 2 compliance against each of the RSMMs from the Concept and Stage 2 SPIR.