Sydney Steel Mill DA11/94

Construction Environmental Management Plan

Prepared for InfraBuild Steel
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Table of Contents

Appendices

Tables

Figures

Acronyms and abbreviations

Acronym	Description
BC Act	*Biodiversity Conservation Act 2016*
BCC	Blacktown City Council
CM	Construction Manager
CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CTMP	Construction Traffic Management Plan
DCCEEW (Cwth)	Department of Department of Climate Change, Energy, the Environment and Water (Cwth)
DECC	Department of Environment and Climate Change
DPHI	Department of Planning, Housing and Infrastructure (NSW)
EIS	Environmental Impact Statement
ESCP	Erosion and Sediment Control Plan
EP&A Act	*Environmental Planning and Assessment Act 1979*
EPA	Environment Protection Authority
EPL	Environment Protection Licence
GFA	Gross Floor Area
ha	hectare
km	kilometre
LGA	Local Government Area
m	metre
NSW	New South Wales
NRAR	Natural Resources Access Regulator
OSOM	Over Size Over Mass
SSM	Sydney Steel Mill
STATCOM	Static Synchronous Compensator
WM Act	*Water Management Act 2000*
WHS Act	*Work Health and Safety Act 2011*

1 Introduction

This Construction Environmental Management Plan (CEMP) has been prepared for implementation by InfraBuild Steel (and its contractors) at the Sydney Steel Mill (SSM) (the Project). The steel mill is located at 22 Kellogg Road Rooty Hill, New South Wales, within the Blacktown City Council Local Government Area (LGA).

The works are approved by State significant development consent DA 11/94, most recently modified on 27 November 2024 (Modification 8).

The following documents have been reviewed and applicable information incorporated into this CEMP:

- Environmental Impact Statement (including technical reports), prepared by Ethos Urban, dated 11 November 2020
- Modification Report Sydney Steel Mill (DA 11/94 Modification 6), prepared by EMM Consulting Pty Ltd (EMM), September 2021
- The applicable conditions of consent, in particular conditions 63B and 70 to 73.

1.1 Project overview

The Sydney Steel Mill (SSM) has been in operation since 1992 and incorporates steelmaking and rolling mill operations. Steel billet is produced by melting recycled scrap in an electric arc furnace before going through the continuous casting machine, where the material is cast into billets. The billets are then reheated and rolled at the on-site rolling mill, cut into lengths and stored prior to distribution to the Australian market.

The site operates under development consent DA 11/94 granted in 1994 under the *Environmental Planning and Assessment Act 1979* (EP&A Act). This approval has been modified on eight occasions. The most recent modifications (Mod 7 and Mod 8) were:

- Modification 7 (October 2023) – inclusion of a predominantly aboveground concrete tank and associated pipework to accept oil and deluge water in the unlikely event of a leak or rupture of existing transformers
- Modification 8 (November 2024) – installation of Static Synchronous Compensator (STATCOM) equipment and associated works. The STATCOM equipment includes an outdoor switchyard, an indoor switchyard, a switch room and a heat exchanger.

1.2 Construction environmental management plan

1.2.1 Scope

The scope of this CEMP includes the construction and relocation activities associated with Mod 7 and Mod 8 of development consent DA 11/94. It addresses the requirements of Conditions 63B and 70 to 73 (Table 1.1).

Table 1.1 Construction environmental management plan requirements

Condition	Element	Requirement	Reference
55A	Flood Emergency Response Plan	Prior to the commissioning of the electrical components associated with DA11/94- Mod-8, the Applicant must prepare a Flood Emergency Response Plan for the site, to the satisfaction of the Secretary. The Plan must include details of: i. the flood emergency responses for both construction and operation phases of the development ii. predicted flood levels iii. flood warning time and flood notification iv. assembly points v. evacuation and refuge protocols vi. awareness training for employees and contractors. *Note: The Flood Emergency Response Plan may be incorporated into the Emergency Plan required by condition 46 of this consent.*	Section 4.10.
55B	Flood Emergency Response Plan implementation	The Applicant must: a) not commission the electrical components associated with DA11/94-Mod-8 until the Flood Emergency Response Plan required by condition 55A is approved by the Secretary; and b) implement the most recent version of the Flood Emergency Response Plan approved by the Secretary for the duration of the development.	Section 4.10.
55C	Floor levels (MOD8)	All floor levels associated with DA11/94-Mod-8 must be no lower than the 1% Annual Exceedance Probability flood plus 500mm of freeboard.	Section 4.10.
63B	Unexpected finds protocol – contamination	Prior to the commencement of construction works associated with DA11/94-Mod-8, the Applicant must prepare an unexpected contamination finds procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the updated CEMP (see condition 72) and must ensure any material identified as contaminated is managed in accordance with the Protection of the Environment Operations Act 1997 and its associated regulations. Details of the final management approach and the results of any associated testing must be submitted to the Secretary within six weeks of the Applicant becoming aware of the contamination find, or as otherwise agreed to by the Secretary.	Section 4.11
70	General	Prior to the commencement of construction works associated with DA11/94-Mod-6, the Applicant must prepare a Construction Environmental Management Plan (CEMP) for the development which must be submitted to the Secretary for approval. The CEMP must include, but not be limited to, the following:	Section 1.2.3
	Road safety	a) detail the measures that are to be implemented to ensure road safety and network efficiency during construction b) detail heavy vehicle routes, access and parking arrangements	Section 4.2
	Land and soil management	c) detail measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site	Section 4.6 and Section 4.8 Appendix B

Table 1.1 Construction environmental management plan requirements

Condition	Element	Requirement	Reference
	Noise and vibration management; and air quality	d) detail management of noise, dust and odour to protect the amenity of the sensitive receivers (see Condition 20); e) detail procedures for achieving the noise management levels in the Environment Protection Authority's Interim Construction Noise Guideline (DECC, 2009) (as may be updated or replaced from time to time); f) detail the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;	Section 4.3 and Section 4.4
	Stormwater management	g) detail measures to manage and control stormwater discharge	Section 4.7
	Biodiversity	h) detail measures to ensure any vegetation or trees within proximity to the work area are suitably protected, including no parking of cars or equipment against them; and	Section 4.5
	Community engagement	i) details of community consultation and complaints handling.	Section 3.5 Appendix A
71	Implementation	The Applicant must:	-
		a) not commence construction until the CEMP required by Condition 70 is approved by the Secretary	Section 1.2.3
		b) implement the most recent version of the CEMP approved by the Secretary for the duration of construction	Section 0
72	Review and approval	Prior to the commencement of construction works associated with DA11/94-Mod-7, or any subsequent modifications, the Applicant must: a) review the CEMP required by Condition 70 b) if necessary, update the CEMP to cater for the approved modification c) gain approval from the Planning Secretary for any updates necessary.	Section 1.2.1 Section 1.2.3
73	Unexpected finds	As part of the updated CEMP for the construction works associated with DA11/94-Mod-8 (see condition 72), the Applicant must include the following:	-
		a) details of the suitable erosion and sediment control measures which will be installed for the duration of construction, designed in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline	Appendix B
		b) an unexpected finds protocol for contaminated material (see condition 63B).	Section 4.11

1.2.2 Objectives

The objectives of this CEMP are to:

- establish procedures to minimise the potential for environmental harm and/or environmental nuisance
- assign responsibility for the implementation, management and review process and to ensure all construction personnel understand individual roles and responsibilities
- ensure construction personnel understand incident and emergency response procedures
- provide a monitoring program to monitor the effective of controls as they are implemented during construction
- demonstrate that all statutory requirements and conditions of approval have been met.

The most recent version of the CEMP, as approved by the Secretary, will be implemented for the duration of construction.

1.2.3 Consultation

This CEMP (v1) was originally approved by the Secretary on 10 March 2022, prior to the commencement of construction works associated with DA11/94-Mod-6, per Condition 70.

This version of the CEMP (v2) has been submitted to the Secretary for approval. The installation of the STATCOM equipment and associated works will not commence approval is received.

InfraBuild Steel regularly engages with the Environment Protection Authority (EPA) regarding SSM operations under Environment Protection Licence (EPL) 6125. The EPA was engaged as part of the application and assessment process for the recent modifications.

No changes to the EPL are required as a result of the recent modifications.

2 Project overview

2.1 Location

The site is located at 22 Kellogg Road, Rooty Hill, Sydney NSW in the Blacktown City Council local government area (Figure 2.1). The site and existing site layout are shown in Figure 2.2. The site is 28 hectares and is approximately 40 km from the Sydney CBD. It is bound by the Main Western Railway line and the Blacktown Olympic Centre to the south, Holcim Regional Distribution Centre (RDC) and Nurragingy Reserve to the east, General Mills and the Westlink M7 Motorway to the west, and an industrial precinct to the north.

2.2 Construction staging and activities

A summary of activities for the construction, staging and associated activities is provided in Table 2.1.

Table 2.1 Summary of activities

Stage	Summary of activities	Timing
Preconstruction activities	• Site establishment, including site boundary fencing, erection of signage and establishment of no go areas. • Establishment of site compound and stockpile sites. • Establishment of site access points, traffic management measures. • Installation of standard erosion and sediment controls. • Pre-clearance surveys and marking fauna habitat trees prior to clearing works.	24 to 48 hours prior to construction
Construction	• Clearing of vegetation. • Preparatory activities, including earthworks and concrete: – site preparation using an excavator/tipper truck/roller – forming the concrete slabs/bunds using standard formwork – pouring of concrete from agitator/concrete trucks – finishing the slab/bund surface with standard concreting tools. • Construction of building, including the indoor switch yard. • Electrical equipment installation, including use of a mobile crane.	Approximately three months (including minimum of 28 days for concrete curing)
Post construction	• Rehabilitation. • Demobilisation of plant and equipment. • Site clean-up.	One week following completion of construction and prior to operation.

Source: EMM (2024); ABS (2021); DCSSS (2023); MetroMap (2024); GA (2009)

0 1 2 km

GDA 1994 MGA Zone 56

N

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KEY

- Site boundary
- Strahler stream order
  - 1st order
  - 2nd order
  - 3rd order
  - 4th order
- Rail line
- Major road
- Minor road
- Named waterbody
- NPWS reserve
- Native vegetation
- Local government area

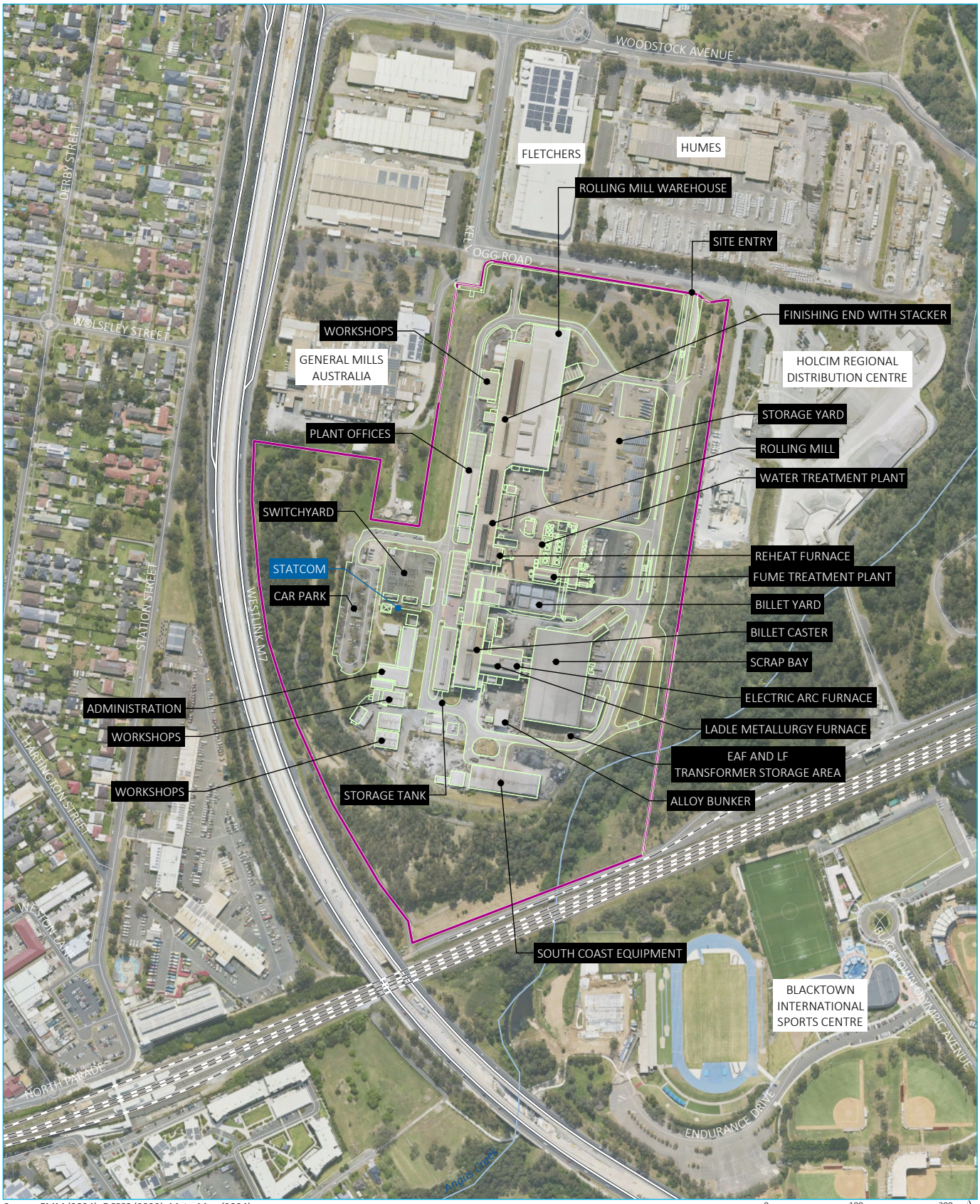
INSET KEY

- Major road
- NPWS reserve
- State forest

Regional setting

Sydney Steel Mill - Rooty Hill
Construction Environmental Management Plan
Figure 2.1

EMM
creating opportunities



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Source: EMM (2024); DCSSS (2023); MetroMap (2024)

0 100 200 m
GDA 1994 MGA Zone 56

N

KEY

- Site boundary
- Site layout

EXISTING SITE ELEMENT

PROPOSED SITE ELEMENT

Existing environment

- Rail line
- Major road
- Minor road
- Watercourse/drainage line

Proposed modification

Sydney Steel Mill - Rooty Hill
Construction Environmental Management Plan
Figure 2.2

EMM
creating opportunities

2.3 Plant and equipment

Typical construction plant and equipment will be used, including:

- mobile crane
- over size over mass (OSOM) transport
- light vehicles
- rigid bogie tippers
- 15 tonne (T) excavator
- concrete trucks and pumps
- mulcher
- hand tools (chainsaw, plate compactor, formwork tools, concrete finishing equipment).

2.4 Construction hours

The working hours for construction will be 7:00 am to 6:00 pm Monday to Friday, and 8:00 am to 1:00 pm Saturday (Condition 20).

2.5 Construction traffic and access

Construction will require some additional traffic generation for delivery of equipment and materials as well as light vehicles for construction workers. Construction will require the site to be accessed by less than 10 trucks per week and minor numbers of light vehicles over approximately a 3-month period. Given that the site is approved for 300 trucks per day (600 movements), there will no discernible increase in site traffic during construction.

All vehicles will utilise the current internal access routes, via the main site entry and along the existing internal road to the construction site. External access routes will be via the M7 motorway and roads within the Rooty Hill industrial area to access the site on Kellogg Road.

Once deliveries are made the trucks will exit the site and will likely not require parking, though temporary parking is available in the administration parking area and overflow areas.

3 Environmental management framework

3.1 Roles and responsibilities

Roles and responsibilities are provided in Table 3.1.

Table 3.1 Roles and responsibilities

Role	Responsibilities
Project Manager	• Ensure the CEMP is made available, communicated, maintained and understood by all construction staff. • Responsible for the overall management of the construction and operation on the site. • Ensure the CEMP is updated with applicable conditions of approval following modifications. • Ensure that the requirements of the CEMP and sub-plans have been addressed in all contractor environmental management documentation. • Review of incidents, non-conformances and non-compliance. • Ensuring construction personnel and contractors are adequately trained and qualified to fulfil their roles.
Construction Manager	• Monitor compliance with CEMP. • Ensure all construction personnel comply with the requirements of the CEMP. • Report any incidents, non-conformances to the Project Manager. • Implement the site safety management plan. • Coordinate traffic management within the construction zone. • Respond to and control safety incidents.
Environmental Engineer	• Oversee all construction works. • Ensure compliance with all environmental protection measures detailed in the CEMP, supporting management plans and conditions of approval. • Ensure all environmental controls are in place and adequately functioning during construction. • Conduct construction inspections and complete reporting requirements, e.g. environmental incidents, non-compliance, corrective action and auditing.
All construction personnel	• Comply with requirements of this CEMP. • Report any actual or potential environmental incidents to the Construction Manager immediately. • Identify and report non-conforming or potentially hazardous work practices, equipment, machinery or products. • Only perform tasks for which they are trained and competent. • Assist with environmental incident investigations and applying corrective actions. • Ensure all machinery, plant and equipment are in good working order and condition prior to use.

3.2 Statutory requirements

Construction must be carried out:

- in compliance with the conditions of consent
- in accordance with all written directions from the Planning Secretary, if any
- in accordance with DA 11/94 (Modification 8)
- in accordance with the approved plan
- in accordance with this CEMP and other relevant management-plans.

Construction is required to adhere to the relevant requirements of the Acts and their subordinate legislation identified in Table 3.2.

Table 3.2 Statutory requirements

Act	Statutory instruments	Regulatory Authority	Applicability
Biodiversity Conservation Act 2016 (BC Act)	Biodiversity Conservation Regulation 2017	BCS	Protection of threatened species, populations and communities and their habitats.
Contaminated Land Management Act 1997	Contaminated Land Management Regulation 2013	EPA	Regulates the management and identification of contaminated land in NSW.
Environmental Planning and Assessment Act 1979 (EP&A Act)	Environmental Planning and Assessment Regulation 2021	DPHI	Modification to the construction scope requiring modification to the Development Consent.
Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act)	-	DCCEEW (Cwth)	Protection of Commonwealth listed flora and fauna species, including migratory species, communities and other matters of National Environmental Significance such as wetlands.
Fisheries Management Act 1994 (FM Act)	Fisheries Management (General) Regulation 2019	DPI (Fisheries NSW)	Protection of threatened aquatic species, populations and communities and their habitats including mangroves.
Heritage Act 1977	Heritage Regulation 2012	Heritage NSW	Protection of non-Aboriginal sites listed on various registers.
National Parks and Wildlife Act 1974	National Parks and Wildlife Regulation 2019	Heritage NSW	Protection of Aboriginal objects and sites. Duty to notify in the event that an Aboriginal object is uncovered.

Act	Statutory instruments	Regulatory Authority	Applicability
Protection of the Environment and Operations Act 1997 (POEO Act)	Protection of the Environment Operations (Waste) Regulation 2014	EPA	Regulates pollution of the environment including licensing certain polluting activities and classifying wastes. Includes provisions for incidents that have caused or give rise to material harm to be reported and managed.
Waste Avoidance and Resource Recovery Act 2001	-	EPA	Regulates waste management practices in NSW.
Water Management Act 2000 (WM Act)	Water Management (General) Regulation 2018	DCCEEW - Water Division	Regulates water resources in NSW and requires licensing and permits for abstraction of groundwater and the taking of water surface water under water sharing plans and other instruments.
Work Health and Safety Act 2011 (WHS Act)	Work Health and Safety Regulation 2017	SafeWork NSW	Regulates compliance and enforcement of the Act in NSW.

3.2.1 Standards, codes and guidelines

The following standards, codes and guidelines are applicable to construction:

- Australian Standards:
  - Australian Standard AS 2601-2001 The Demolition of Structures
  - Australian Standard AS1940-2004 The Storage and Handling of Flammable and Combustible Liquids
- NSW EPA Waste Classification Guidelines
- Interim Construction Noise Guideline (DECC 2009)
- Managing Urban Stormwater: Soils and Construction – Volume 1: Blue Book (Landcom 2004)
- Planning for Bushfire Protection 2019.

3.2.2 Approvals, licences and permits

Approvals relevant to construction are:

- Development consent DA 11/94
- EPL 6125.

3.3 Inductions and environmental training

All construction staff will be made aware of the site-specific environmental controls through a site induction, and pre-start meetings/toolbox talks prior to the commencement of construction.

3.3.1 Site specific induction

The site induction will cover the following key aspects:

- purpose and objectives of the CEMP
- roles and responsibilities, including due diligence and duty of care
- overview of environmental risks and specific locations of environmental and cultural significance
- the scope of legislative requirements and other licences and approvals
- communication and notification requirements, e.g. procedures for notifying and reporting incidents and complaints
- key environmental management and controls stipulated in the CEMP
- workplace health and safety issues, including high-risk activities and associated safeguards
- emergency preparedness and response
- procedures for notifying and reporting incidents and complaints.

Site inductions will be recorded, including details of topics discussed, attendees and duration. Copies of the site inductions will be stored in a register and signed attendance sheets will be filed in the induction system, an induction passport is issued to each person completing the induction and checked for currency at security before contractors are given access to the site.

3.3.2 Toolbox talks

Toolbox talks will be held weekly and tailored to specific environmental issues relevant to the upcoming works. Topics to be discussed will include (but not limited to):

- erosion and sediment control
- vegetation clearing
- traffic routes and traffic control plan (TCP) requirements
- pollution management
- hours of work.

3.3.3 Pre-start meetings

Pre-start meetings will be conducted daily prior to commencement of works. Topics to be discussed will include (but not limited to):

- daily work activities
- safe work practices
- environmental controls
- no-go zones/restricted work areas
- hazards
- any other information which may be relevant to the day's work.

3.4 Incident and non-compliance response and handling procedure

3.4.1 Responsibility

The Project Manager will be responsible for the management and reporting of incidents and non-compliances.

3.4.2 Notification requirements

i Incident and non-compliance notification requirements

DPHI and other relevant agencies will be notified as soon as practicable following the occurrence of an exceedance of the limits/performance criteria in this CEMP.

Where the occurrence of an incident that causes (or may cause) harm to the environment, as outlined in Schedule 4, Condition 64 of DA11/94 the actions identified in the Pollution Incident Response Management Plan (PIRMP) under EPL 6125 will be implemented.

The Department and other relevant agencies will be notified within six days of the exceedance or incident (as required under the PIRMP) and will be provided with a written report. The written report must:

- describe the date, time and nature of the exceedance/incident
- identify the cause (or likely cause) of the exceedance/incident
- describe what action(s) has/have been taken to date.

Where requested under EPL 6125 by an EPA officer further written reports may be prepared under conditions R2 and R3.

3.4.3 Incidents

Incidents may comprise (but not limited to):

- serious injuries requirement urgent medical help
- sewer or water service breaks

- fires and explosions
- clearing outside of approved limits
- construction work outside of approved hours
- disposal of wastes to unlicensed premises
- release of pollutants, e.g. release of sediment into watercourse, chemical spill.

Specific provisions, detailed below, are required for pollution incidents and notifiable environmental incidents.

i Pollution incidents

Pollution incidents may comprise (but are not limited to):

- pollution, or potential pollution of waterbodies
- discharges of waters from site not in accordance with approval requirements
- uncontrolled releases of chemicals, paint or fuels
- a spill that causes pollution to land/soils
- excessive noise from vehicles, transport or construction activities near people's residence or workplace, especially outside of standard work hours.

ii Notifiable environmental incidents

Where an incident has caused or is threatening to cause 'Material harm to the environment', the regulatory agency must be notified. As defined in Section 147 of the *Protection of the Environment Operations Act 1997* (POEA Act):

> "(a)…harm to the environment is material if:
>
> it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
>
> (ii) It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and
>
> (b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment."

3.4.4 Non-compliances

A non-compliance refers to the failure to comply with a condition of consent (e.g. exceedance of the impact assessment criteria and performance criteria for noise and vibration) and requires notification to the Planning Secretary.

Non-compliance may be identified through routine weekly inspections, impromptu site inspections, via the CEMP review and audit process or following an incident.

The Project Manager is responsible for investigation and management of corrective and preventive actions in the event of non-compliance.

3.4.5 Incidents and non-compliance handling procedure

In the event of an incident/near-miss, the following steps should be taken:

1. **Stop** works in the area and if safe to do so ensure the safety of personnel within the vicinity.

2. **Notify** relevant persons, e.g. Construction Manager, further notifications under the PIRMP may be required where the incident is notifiable.

3. **Isolate** the risk or hazard, e.g. turn off machinery/plant, shut off valves, isolate energy sources, implement immediate site controls, set up exclusion zones.

4. **Report/review** investigate the cause of the incident or near miss, document the investigation, review the cause of the incident/near miss and assess against the risk assessment for the task, modify the task where required to eliminate the potential for a repeat of the incident. Toolbox staff on the findings and adjustments to the task.

3.4.6 Incidents and non-compliance register

The following information should be recorded for all incidents/near misses/non-compliances:

- time and date of the incident/near miss/non-compliance
- a description of the incident/near miss/non-compliance
- the sequence of events that led to the incident/near miss/non-compliance occurring
- person/s involved in the incident/near miss/non-compliance (including witnesses)
- details of corrective actions.

3.4.7 Minor environmental incidents

In the event of a minor environment incident (including a near miss), all personnel shall follow the procedures outlined in Sections 3.4.6 and 3.4.5.

3.4.8 Corrective actions

Corrective actions may be triggered by an incident or non-compliance and will include immediate steps taken to control the event, as well as development of additional controls to prevent reoccurrence.

Corrective actions should be prioritised on the following hierarchy of controls:

1. **Elimination** – can activities and processes be eliminated to reduce the risk of reoccurrence?

2. **Substitution** – Can activities be substituted with another activity of lesser risk?

3. **Isolation** – can you isolate the hazard from any person exposed to it?

4. **Engineering controls** – can you reduce the risk of reoccurrence through engineering changes?

5. **Administrative controls** – can a change in work practices, additional training or additional checks reduce the risk?

6. **Personal Protective Equipment (PPE)** – can PPE be worn to protect personnel from harm?

Corrective actions will be documented on the Incident and non-compliance form and be assigned to the appropriate personnel for close out. The Construction Manager will be responsible for managing and overseeing the implementation of corrective actions on-site and ensuring appropriate documentation is completed and filed for record keeping. Records of all incidents and non-compliances and associated corrective actions are to be provided to the Project Manager.

3.4.9 Regulatory agency notification

i Material harm pollution incident

A person engaged as an employee in carrying on an activity must, immediately after the person becomes aware of the incident, notify the employer of the incident and all relevant information about it (s148 of POEO Act). If the employer cannot be contacted, the person is required to notify each relevant authority (e.g. EPA, Fire and Rescue NSW, SafeWork NSW).

The Construction Manager is responsible for determining if an incident is considered 'material harm' and notifying the appropriate regulatory authority and other response agencies in accordance with the requirements stipulated in Part 5.7 of the POEO Act.

ii Breach of condition of approval

DPHI will be notified by the Project Manager when there has been a breach of a condition of approval.

3.5 Community complaints response

3.5.1 Responsibility

The Project Manager will be responsible for investigating, recording and closing out any complaints received in accordance with the Environmental Complaints Management Procedure (Appendix A). The existing complaints register for the site will be continued during construction.

3.5.2 Complaints handling procedure

Should complaints be received from the public in relation to the Project, they will be managed in accordance with the Environmental Complaints Management Procedure outlined in Appendix A.

3.5.3 Complaints register

SSM maintains a complaint register, that includes the following details:

- date and time of the complaint
- nature of the complaint
- details of the complainant
- any actions taken to address the complaint.

A complaints summary is included in the Annual Return that is submitted annually by SSM to the EPA. This register will also be used to record any construction related complaints.

3.6 Dispute resolution

The dispute resolution procedure is outlined in the Environmental Complaints Management Procedure (Appendix A). This will be implemented for the duration of construction.

4 Environmental management

The following section outlines the management strategies to be implemented for minimising impacts on the environment which may occur as a direct result of construction activities. Elements to be covered include:

- general construction activity
- traffic
- air quality
- acoustics and vibration
- biodiversity
- erosion and sediment control
- stormwater
- soils
- waste
- flooding
- contamination
- heritage.

4.1 General

General construction and environmental management controls are provided in Table 4.1.

Table 4.1 General construction environmental management

Environmental management control	Person responsible	Timing/frequency	Reference/notes
All employees, contractors (and sub-contractors) must attend a site induction where they will be made aware of, and instructed to comply with, the conditions of consent and the requirements of this CEMP.	Construction Manager	Prior to commencement of works	Section 3.3
Site personnel must hold relevant licences to perform assigned tasks/work and provide evidence of these licences prior to commencement of works.	Construction Manager	Prior to commencement of works	Section 3.1
Prior to the commencement construction works associated with DA11/94 Mod 8, a Construction environmental Management Plan (CEMP) for the development, must be submitted to the Secretary for approval.	Construction Manager	Prior to commencement of works	Section 1.2.3

4.2 Traffic

The environmental management controls in Table 4.2 will be implemented to ensure road safety and network efficiency during construction.

Table 4.2 Environmental management controls for traffic

Environmental management controls	Person responsible	Timing/frequency	Reference/notes
Minimise impacts of earthworks and construction on the local and regional road network	Construction Manager	Earthworks/ construction	-
Minimise conflicts with other road users including pedestrians through the implementation of appropriate driver training and traffic controls	Construction Manager	Duration of construction	-
Minimise road traffic noise through driver training and awareness	Construction Manager	Duration of construction	-
Implement traffic monitoring program to measure effectiveness of traffic controls	Construction Manager	Duration of construction	-
All loading/unloading of materials is to be carried out on-site	Construction Manager	Duration of construction	-
All trucks entering/leaving site must have their loads covered and do not track dirt onto the public road network	Construction Manager	Duration of construction	-
All vehicles associated with the construction works will be brushed down to prevent any sediment being tracked onto roadways	Construction Manager	Duration of construction	-
Construction traffic is estimated be less than ten heavy vehicles per week. Construction traffic is not to exceed the existing heavy vehicle limit for SSM of 600 movements per day.	Construction Manager	Duration of construction	Schedule 2, Condition 5

4.3 Air quality

The environmental management controls in Table 4.3 will be implemented to minimise potential impacts to the existing air quality.

Table 4.3 Environmental management controls for air quality

Measure	Person responsible	Time/frequency	Reference/notes
Air quality emission will continue to be monitored against air quality criteria, as outlined in the EPL 6125, to minimise the risk of any emissions generated during construction does not affect the existing air quality. Ambient air quality is monitored via dust deposition gauges, at six locations across the site on a monthly basis	Environmental Engineer	Monthly Frequency may increase during the project if there is excess discharge to air emissions	
Dust suppression (watering) and sweeping of the site roads will continue to occur on a regular basis and have the potential to be increased if required	Construction Manager	Duration of construction	-

Measure	Person responsible	Time/frequency	Reference/notes
Position dust generating machinery away from receptors	Construction Manager	Duration of construction	Nearest receptor is located 90 m to the south
Cover stockpiles to prevent wind erosion where inactive for greater than 20 days	Construction Manager	Duration of construction	-
Remove materials that have the potential to produce dust from site as soon as possible	Construction Manager	Duration of construction	-
Ensure all construction vehicles are turned off when stationary and no idling vehicles	Construction Manager	Duration of construction	-
Ensure equipment (spill kits and booms) is readily available on site to clean any dry spillages and clean up spillages as soon as reasonably practicable after the event. Wet cleaning methods such as sweeping trucks may be required for some spills such as clay and mud tracking.	Construction Manager	Pre-construction / construction	-

4.4 Acoustics and vibration

The environmental management controls in Table 4.4 will be implemented to minimise potential impacts to acoustics and vibration.

Table 4.4 Environmental management controls for acoustics and vibration

Measure	Person responsible	Time/frequency	Reference/notes
Construction activities would be undertaken within the recommended construction hours specified in the Interim Construction Noise Guideline (DECC 2009), Monday to Friday 7 am to 6 pm and Saturday 8 am to 1 pm	Construction Manager	Duration of construction	Interim Construction Noise Guideline (DECC 2009) Schedule 3, Condition 21
Noise from the operation of the project will not exceed the approved noise limits.	Construction Manager	Duration of construction	Schedule 3, Condition 22
All plant and equipment are to be maintained such that they are in good working order	Construction Manager	Duration of construction	Plant pre-start records
Stationary plant required for construction will be positioned where possible to include shielding from residential receivers where out of standard hours work is approved	Construction Manager	Duration of construction	-
Internal roads within the site are sealed and speed limits apply to minimise vehicular	Construction Manager	Duration of construction	-
Vibration intensive equipment (e.g. rollers) will be assessed prior to use where it is proposed to be used, to ensure effective structural damage distances are in place from existing structures and adjacent buildings as per ANZECC guidelines.	Construction Manager	Pre-construction	Report on vibration structural damage potential

4.5 Biodiversity

The environmental management controls in Table 4.5 will be implemented to minimise potential impacts to biodiversity.

Table 4.5 Environmental management controls for biodiversity

Measure	Person responsible	Time/frequency	Reference/notes
Vegetation approved to be removed will be clearly marked for clearing prior to works affecting vegetation commencing	Environmental Engineer	Pre-construction	-
Clearing limits will be established for the approved project	Environmental Engineer	Pre-construction	-
No parking and/or equipment will be placed within close proximity to trees not being removed	Construction Manager	Duration of construction	As per BCC advice dated 14 November 2021
No clearing or disturbance to any other vegetation than that previously assessed as part of Mod 8 is to be undertaken	Environmental Engineer	Duration of construction	-
Staff training and site briefing to communicate any environmental features to be protected and measures to be implemented	Environmental Engineer	Pre-construction	-
The shrub removed as part of MOD7 is to be replaced with a similar species elsewhere on the site	Environmental Engineer	Post-construction	Condition 60B
An ecosystem credit must be purchased or retired for one Cumberland Plain Woodland in the Sydney Basin Bioregion to offset the removal of plant community type (PCT) 3320.	Project Manager	Pre-construction	Condition 63A

4.6 Erosion and sediment control

The environmental management controls in Table 4.6 will be implemented to minimise potential impacts to existing soils and waterways.

An erosion and sediment control plan is provided in Appendix B.

Table 4.6 Environmental management controls for soils

Measure	Person responsible	Timing/frequency	Reference/notes
An Erosion and Sediment Control Plan must be prepared in accordance with the Managing Urban Stormwater, Soils and Construction Vol.1 (Landcom, 2004) prior to commencement of works related to Mod 8	Environmental Engineer	Pre-construction	Conditions 51 and 73
All vehicles associated with the construction works will be brushed down to prevent any sediment being tracked onto roadways	Construction Manager	Construction	-
Install and maintain Erosion and Sediment Control measures, in accordance with the Erosion and Sediment Control Plan (ESCP) in Appendix B	Environmental Engineer	Pre-construction/construction	ESCP (see Appendix B)

Measure	Person responsible	Timing/frequency	Reference/notes
A sediment control such as a sediment fence, berm, or similar, will be positioned downslope of any stockpile to minimise sediment migration	Environmental Engineer	Pre-construction/construction	ESCP
Install and maintain stabilised site access points to the construction area	Construction Manager	Pre-construction, duration of works	ESCP
Review and restore erosion and sediment controls, including drain socks, as per the ESCP	Construction Manager	Construction	ESCP
ESCPs must be updated (where required) to reflect site conditions during construction.	Environmental Engineer	Construction	ESCP
Erosion and sediment controls must be inspected weekly and after rain events causing runoff (>10 mm)	Environmental Engineer	Construction After rain event causing runoff >10 mm)	ESCP

4.7 Stormwater

The environmental management controls in Table 4.7 will be implemented to minimise impacts on existing watercourses and resources.

Table 4.7 Environmental management controls for stormwater

Measure	Person responsible	Timing/frequency	Reference/notes
Implement the ESCP	Construction Manager	Duration of construction	ESCP
Any relevant stormwater management works carried out will be consistent with the Blacktown Development Control Plan (BCC DCP) (2015) Water Sensitive Urban Design and Integrated Water Cycle Management	Construction Manager	Duration of construction	Blacktown City Council Development Control Plan 2015
Clean water diversions must be installed prior to the commencement of work in accordance with the ESCP	Construction Manager	Pre-Construction	ESCP
Sediment-laden water will be diverted into temporary controls to filter sediment and prevent uncontrolled offsite discharges	Construction Manager	Construction	ESCP
Divert storm water around laydown or chemical /hazardous material storage areas	Construction Manager	Construction	ESCP
Temporary stockpiles should be placed away from drainage lines, waterways and areas where they may be susceptible to wind erosion	Construction Manager	Construction	ESCP
Refuelling activities must be supervised at all times and hoses must be fitted with a stop valve at the nozzle end	Construction Manager	Construction	ESCP

Measure	Person responsible	Timing/frequency	Reference/notes
An adequate number of spill kits or absorbent material is to be kept on site and easily accessible to all staff. The spill kits should be capable of dealing with both large and small spills. Spills can be classified as follows: • A small spillage <5 litres • A medium spillage: 5 to 100 litres • A large spillage: >100 litres	Construction Manager	Construction	-
All potentially contaminated stormwater (sediment and hydrocarbons) is treated prior to discharge to the environment or contained and disposed of off-site	Construction Manager	Prior to discharge	-

4.8 Soils

The environmental management controls in Table 4.8 will be implemented to minimise impacts on existing soils.

Table 4.8 Environmental management controls for salinity

Measure	Person responsible	Timing/frequency	Reference/notes
Prior to the construction of any utility works, the applicant shall obtain the relevant approvals from service providers, including Sydney Water	Construction Manager	Prior to commencement of works	Condition 50
Implement the ESCP	Construction Manager	Duration of construction	ESCP
Minimise ground disturbance to the design footprint	Construction Manager	Construction	-
Topsoil conservation shall be carried out in all areas where excavation or levelling is necessary, including trench lines, drilling areas and laydown areas	Construction Manager	Construction	-
Storage areas for fuels, oils and chemicals to be used during construction must be covered and contained within an impervious bund to retain any spills of more than 125% of the volume of the largest container in the bunded area	Construction Manager	Construction	-
Refuelling/lube trucks, will carry hydrocarbon spill kits and utilise spill trays during refuelling	Construction Manager	Construction	-
An adequate number of spill kits or absorbent material is to be kept on site and easily accessible to all staff. The spill kit should be capable of dealing with both large and small spills	Construction Manager	Construction	-
Type and size of spill kits must be selected based on the type and volume of materials stored	Construction Manager	Construction	-

4.9 Waste

The Project will generate waste during demolition and construction, including excavation material, timber, concrete, bricks/pavers, packaging, garden organics, containers, paper and cardboard, and residual waste material.

The environmental management controls in Table 4.9 will be implemented to minimise and manage waste from the Project.

Table 4.9 Environmental management controls for waste

Measure	Person responsible	Timing/frequency	Reference/notes
All waste will be separated into waste streams and contained within appropriate bins and/or disposed of in accordance with the EPA Guidelines.	Construction Manager	During construction	-
Only wastes generated during construction. that cannot be reused, reprocessed or recycled, will be collected and disposed of by licenced contractors	Construction Manager	Duration of construction	Condition 40
Waste must be secured and maintained within designated waste storage areas and must not leave the site onto neighbouring public or private properties	Construction Manager	During construction	Only waste that cannot be reused, reprocessed or recycled would be collected and stored in general waste bins, prior to transportation off-site.
All asbestos, hazardous and/or intractable wastes are to be disposed of in accordance with Safe Work Authority and EPA requirements	Construction Manager	Demolition/construction	-
Reduce packaging waste by using returnable packaging such as pallets and reels where practical	Construction Manager	Duration of construction	-
All construction personnel to be informed of site waste management procedures during site induction	Construction Manager	Prior to commencement of works	-
All solid waste timber, concrete, tiles and rock that cannot be reused or recycled will be taken to an appropriate facility for treatment to recover further resources or for disposal to a licenced landfill	Construction Manager	Demolition/construction	-
The site's toilet and washroom facilities will be used	Construction Manager	Duration of construction	-
Bins for the collection of recyclable resources will be provided onsite to enable offsite recycling	Construction Manager	Duration of construction	-
All waste bins will be kept clean and in good condition	Construction Manager	Duration of construction	-
All wastes will be transported in accordance with relevant regulatory requirements. Where required, appropriately licenced transport contractors will be used	Construction Manager	Duration of construction	-
All waste transportation vehicles will be covered appropriately to ensure waste cannot spill, leak or escape onto the road or wash into stormwater drains	Construction Manager	Duration of construction	-

Measure	Person responsible	Timing/frequency	Reference/notes
Waste storage locations will be accessible and allow sufficient space for storage and servicing requirements	Construction Manager	Duration of construction	-
All waste stockpile areas/skips for disposal or recycling shall be adequately contained to ensure that the waste does not fall, blow, wash or otherwise escape from the site	Construction Manager	Duration of construction	-
Waste records, tracking and reporting procedures will be implemented	Construction Manager/ Environmental Engineer	Duration of construction	-
Recycling bins will be accessible to all demolition and construction employees and must be clearly sign posted to ensure segregation of waste and recycling is effective	Construction Manager	Duration of construction	Paper and cardboard would continue to be collected in bins marked 'paper' or 'cardboard' only, prior to transportation off-site.
All liquid and non-liquid wastes generated will be classified in accordance with the requirements of NSW EPA (2014) Waste Classification Guidelines, Part 1: Classifying Waste and dispose of all wastes to a facility that may lawfully accept the waste	Construction Manager	Duration of construction	Any oily water, glycol, oil and/ or grease will continue to be collected in oil skimmer collection boxes, drums and IBCs, prior to transportation off-site.

4.10 Flooding

4.10.1 Flood emergency response

Condition 55A specifies that prior to the commissioning of the electrical components associated with MOD 8, a Flood Emergency Response Plan must be prepared for the site to the satisfaction of the Secretary. This may be incorporated into the site's Emergency Response Plan.

The Flood Emergency Response Plan must include details of:

i) the flood emergency responses for both construction and operation phases of the development

ii) predicted flood levels

iii) flood warning time and flood notification

iv) assembly points

v) evacuation and refuge protocols

vi) awareness training for employees and contractors.

These details are provided in the Sydney Steel Mill Emergency Response Plan.

The electrical components associated with MOD 8 will not be commissioned until the updated Emergency Response Plan is approved by the Secretary.

The Sydney Steel Mill Emergency Response Plan will be implemented as approved.

4.10.2 Modification 8 floor levels

All floor levels associated with MOD 8 will be no lower than the flood planning level – being a flood design event of a 1% Annual Exceedance Probability flood (36.54 m AHD)[1] plus 500 mm of freeboard (37.04 m AHD).

4.11 Contamination

Condition 63B specifies that the CEMP should include an unexpected finds protocol for contaminated material. The appropriate management of unexpected finds will minimise human health and environmental risks from the disturbance of potential contaminated materials and will ensure the material is managed in accordance with the *Contaminated Land Management Act 1997* and the POEO Act.

Unexpected finds at the site could relate to buried finds and/or volatile contaminants including:

- oil/diesel/tar/petrol sheens, free product, odours or impacted soils
- buried material, such as drums, disused pipe work, tyres or waste
- asbestos pieces, fibre cement sheets or fibres
- discoloured or odorous soil
- acid sulphate soils (ASS) or potential ASS, appearing as grey, gluggy soils with rotten egg smell.

The following procedures will be implemented if suspected contamination is discovered during excavation:

1. Upon discovery of suspected contamination, all construction works in the immediate vicinity are to cease, the Project Manager is to be notified and the area barricaded.

2. The potentially contaminated material is to be removed and disposed of in accordance with the *Waste Classification Guidelines* (EPA 2014). This may include removal of a buffer zone around the potentially contaminated material, based on field observations or volatile detections with a photoionization detector. The notification and engagement of a qualified environmental consultant will be required to assess the nature and degree of potential contamination and classification.

3. Unless otherwise demonstrated, suspected potentially contaminated material will be treated as contaminated material and will be removed off-site to a waste facility licensed to accept contaminated material.

4. If the find is suspected to be asbestos material, the area is to be kept wet and management practices implemented in accordance with the *Code of Practice: How to Manage and Control Asbestos in the Workplace* (Safework NSW 2016). If appropriate, the material will be covered to prevent dust generation, pending final management.

5. If the find is actually ASS or potential ASS, a suitably qualified consultant is to be engaged to manage the ASS in accordance with the N*ational Guidance for the Management of Acid Sulfate Soils in Inland Aquatic Ecosystems* (EPHC and NRMMC 2011).

[1] Blacktown City Council, Flood Advice at Blacktown City Council to P. Towler, EMM, email 19 November 2024.

6. Unexpected finds are to be documented throughout the unexpected finds process. This will include date(s), location(s), persons involved and remedial actions.

7. Once the area is remediated and validated construction works will recommence.

8. Any required remediation will be directed by the Project Manager with supervision from a qualified Environmental Consultant depending on the type and extent of contamination.

4.12 Heritage

Given the site's history, heritage items are unlikely to be found within the site. Nevertheless, there have been instances, even when thorough cultural heritage assessments are undertaken during the environmental assessment process, where unexpected heritage items (both Aboriginal and non-Aboriginal) are not appropriately identified and are subsequently found on a construction site.

The unexpected items can be broadly categorised into three groups: Aboriginal objects, historical (non-Aboriginal) heritage items, and human skeletal remains. Examples of potential Aboriginal and non-Aboriginal discoveries include:

- Aboriginal stone artefacts, shell middens, burial sites, engraved rock art and scarred trees
- artefacts such as broken and complete bottles, ceramics, glass, animal bones and clay pipes
- remains of infrastructure such as buildings, stations, bridges, rail lines, drainage services, kerbs and pavements and road surfaces
- human skeletal remains.

Should heritage items be found (Aboriginal or non-Aboriginal), the following management measures will be implemented:

- Aboriginal objects and places remain protected under the NPW Act. Considering this, all workers should be made aware that it is illegal to harm an Aboriginal object, and if a potential Aboriginal object is encountered during activities associated with the project, all work will cease in the immediate vicinity of the item and a qualified heritage professional will be contacted for advice.
- If unexpected historical archaeology is discovered during construction, work in the immediate area must cease and an archaeologist must be contacted to make an assessment of the find. If it is determined to be a relic under the *Heritage Act 1977*, further investigation may be required.
- In the event that known or suspected human skeletal remains are encountered during the activity, the following procedure will be followed:
    - all work in the immediate vicinity will cease and the find will be immediately reported to the work supervisor who will immediately advise the Construction Manager or other nominated senior staff member
    - the Construction Manager or other nominated senior staff member will immediately notify the police and the state coroner (as required for all human remains discoveries)

- the Construction Manager or other nominated senior staff member will contact Heritage NSW for advice on identification of the skeletal material
- if it is determined that the skeletal material is Aboriginal ancestral remains, the Local Aboriginal Land Council will be contacted and consultative arrangements will be made to discuss ongoing care of the remains
- if it is determined that the skeletal material is not Aboriginal ancestral remains, further investigation will be conducted to determine if the remains represent a historical grave or if further involvement of the police is required.

5 Monitoring and reporting

5.1 Environmental monitoring and inspections

5.1.1 Environmental monitoring

The Environmental Engineer will conduct monitoring during pre-construction/construction to ensure compliance with this CEMP, relevant plans and conditions of approval and to evaluate the effectiveness of environmental controls listed in Section 4.

5.1.2 Environmental inspections

The Environmental Engineer will undertake weekly inspections utilising the Operations Environmental Checklist.

Additional Erosion and Sediment Control inspections will be completed prior to adverse weather conditions and following a rainfall event of more than 10 mm of rain within a 24-hour period.

Copies of the inspection reports will be kept.

5.2 Audits

The Environmental Representative will undertake an audit within four weeks of construction commencing to verify compliance with this CEMP, relevant sub-plans, conditions of consent and any other relevant statutory requirements such as licences and permits.

An audit checklist will be developed and maintained.

5.3 Reporting

The reports listed in Table 5.1 will be prepared during the delivery of the Project.

Table 5.1 Reporting requirements

Report/form/checklist	Prepared by	Timing	Distributed to
Environmental monitoring and inspection checklists	Environmental Engineer	Weekly	Construction Manager
Environmental audit report	Environmental Engineer	Once within 4 weeks of construction commencing	Construction Manager
Incident reports	Environmental Engineer	Notification within 24 hours of any incident or potential incident. Detailed report no later than 14 days after the incident	Construction Manager
Non-compliance report	Environmental Engineer	As required	Construction Manager
Environmental monthly report	Environmental Engineer	Monthly	Construction Manager

5.4 Records

All Project related documentation will be maintained by InfraBuild. Documents stored within the files include the following:

- copies of relevant planning approvals and documents, licences and permits
- all completed induction forms and visitor sign-on register
- records of routine environmental inspections
- records of any environmental incidents, complaints and non-compliances.

6 Review and improvement of environmental performance against CEMP

6.1 CEMP review

This CEMP will undergo reviews and amendments as necessary. Reviews will generally be undertaken:

- if the consent is modified
- prior to commencement of construction to ensure any relevant conditions of consent and/or other approval, licence or permit requirements are incorporated
- if there is a need to improve environmental controls to protect environmental values
- if there is an increase or introduction of a new environmental risk or impacts.