Environmental Management Plan

Owner: Dragline Cleaning Services Pty Ltd
Effective Date: 12/11/2020
Review Date: 12/11/2021
Version 2

This document is authorised by:

Jeff Downs

DIRECTOR

Contents

1. Introduction

This Environmental Management Plan (EMP) details how the environmental management requirements will be implemented and managed on site by Dragline Cleaning Services Pty Ltd.

The aim of the EMP is to ensure compliance with environmental legislation and that environmental risks associated with the project are properly managed.

2. Project Description

The project is located at all serviced Dragline Cleaning Services Pty Ltd sites. The description of the project includes:

2.1. Description of the Project

- main activities to be conducted.
- working hours.
- commencement and completion dates.
- staff numbers and roles.
- plant and equipment to be used.
- location of site facilities and work compounds.
- main features of surrounding sites including usage (e.g. occupied homes); and
- environmentally sensitive areas on the site and surrounding areas.

3. Environmental Management Plan Objective

An Environmental Management Plan (EMP) is a site or project specific plan developed to ensure that appropriate environmental management practices are followed during a project.

The objectives of this EMP are:

- to comply with applicable environmental legislation.
- minimise damage to the environment caused by the services.
- comply with site specific environmental guidelines and requirements.
- to ensure all environmental safeguards are implemented correctly; and
- to monitor the project's environmental impact.

4. DCS Environmental Policy

4.1. Company Details

Dragline Cleaning Services Pty Ltd
Director: Jeff Downs
Office.support@dcsqld.com

ABN: 79 607 070 879

1 Satellite Cres, Mackay Harbour Qld 4740
PO 3033, North Mackay Qld 4740

4.2. Introduction

Dragline Cleaning Services Pty Ltd has developed the following policy to create a safe and healthy workplace(s). This policy outlines the rules, responsibilities and procedures for environmental protection.

4.3. Scope

This policy applies across the organisation of Dragline Cleaning Services Pty Ltd and across all workplaces/worksites under this organisations control, including contractors/sub-contractors and visitors to the workplace/worksite. Dragline Cleaning Services Pty Ltd will continually improve our environmental performance, prevent environmental harm associated with our activities, develop employee environmental awareness, report on environmental performance and minimise waste.

4.4. Rules

- Wherever practicable employees at Dragline Cleaning Services Pty Ltd will reduce the volume of waste generated and reuse and recycle.
- Whenever possible new products and supplies should be reusable and/or recyclable.
- Whenever possible newly purchased Vehicles and Equipment should be attained from organisations with an Environmental Management Plan and Emissions Reduction Scheme to ensure product has the best environmental footprint possible for its range and field.
- Whenever possible ensuring the purchase of Fuel efficient Vehicles and Equipment to reduce carbon footprint for its range and field.
- Where possible purchase responsibly for example purchase local products to reduce transport emissions and support the local

community, be aware of where the product or its raw components have come from – is it causing deforestation, loss of habitat or exploiting workers in another country;

- Prevent any actions from work activities causing environmental damage by following preventative procedures In the event of an incident/accident follow the emergency procedures, making sure that the appropriate equipment is available for clean-up and that a quick response is applied to eliminate or reduce any damage; and
- Ensure fuel efficiency and reduction of Hydrocarbon emission through scheduling efficiencies such as car pooling, limitation of excess use of vehicles, limitation of travel radius through scheduling and direct route plan to minimise distance. Fuelling only on requirement to reduce excess.
- Be aware of environmental issues and safeguards, including erosion and sediment control, weed invasion, sensitive/rare vegetation and fauna, air quality, noise, waste, heritage and archaeological sites.

4.5. Responsibilities

Dragline Cleaning Services Pty Ltd Managers and Supervisors must:

- Implement and review this policy.
- Consult with workers about this policy.
- Provide resources, information, training and supervision for workers to allow them to adhere to the rules and have the knowledge and resources to follow the procedures and understand their roles and responsibilities.
- Comply with statutory requirements, codes, standards and guidelines.
- Implement and comply with site Environmental Management Plans (EMP).
- Make sure all equipment is serviced and not showing visible emissions.
- Make sure noise and air pollution are monitored and kept to the appropriate levels.
- Provide areas for chemical storage and hosing down.
- Make sure all incidents are investigated and if required appropriate disciplinary action carried out; and

Workers must:

- Comply with the rules of this policy and follow environmental procedures.
- Not act in a manner that places the environment at risk.
- Use, store and dispose of chemicals as per the Safety Data Sheet (SDS).
- Remove waste from the workplace / worksite and place in designated waste areas.
- Reduce the damage to flora and fauna.
- Wash machinery in designated area.

- Make sure correct measures are in place for sediment control.
- Report any incidents or complaints to the officer / supervisor.
- Participate in consultation and training in relation to environmental management; and
- Advise officer or supervisor of any potential breaches of plans or statements, and sightings of rare plants or animals, fauna or archaeological or heritage items.

4.6. Sign Off

This document is authorised by:

Jeff Downs

DIRECTOR

5. Environmental Management

5.1. Environmental Management Structure Reasonability

The principle responsibilities of Dragline Cleaning Services Pty Ltd workers with respect to the environment are described below. The management structure is set out in the following diagram. A matrix of specific site responsibilities is set out in **Table 5.1** below.

5.1.1. Project Manager

The Project Manager is responsible for promoting and maintaining good environmental management. The Project Manager is to ensure that this EMP is effectively implemented. The Project Manager is required to support the Site Supervisor and hold them accountable for their specific responsibilities. The Project Manager is responsible for taking prompt remedial action to eliminate any non-compliance or environmentally risky conditions.

5.1.2. Site Supervisor

The Site Supervisor is responsible for inducting all workers and subcontractors and directing site activities in accordance with this EMP.
The Site Supervisor is responsible for taking all practical measures to ensure the site is operating according to this EMP, and without risks to the

environment. The Site Supervisor is responsible for detecting any non-compliance or environmentally risky conditions. If the Site Supervisor does not have the necessary authority to fix a problem, they are responsible for reporting the matter promptly and recommending remedial action to the Project Manager.

5.1.3. Workers

All workers are required to attend site inductions and follow this EMP. Workers are responsible for advising the Site Supervisor of any potential environmental issues.

5.1.4. Subcontractors

All subcontractors engaged to perform work for Dragline Cleaning Services Pty Ltd are required, as part of their contract, to comply with this EMP and to comply with directions from the company's designated officers. Failure to comply will be considered a breach of the contract and sufficient grounds for termination of the contract.

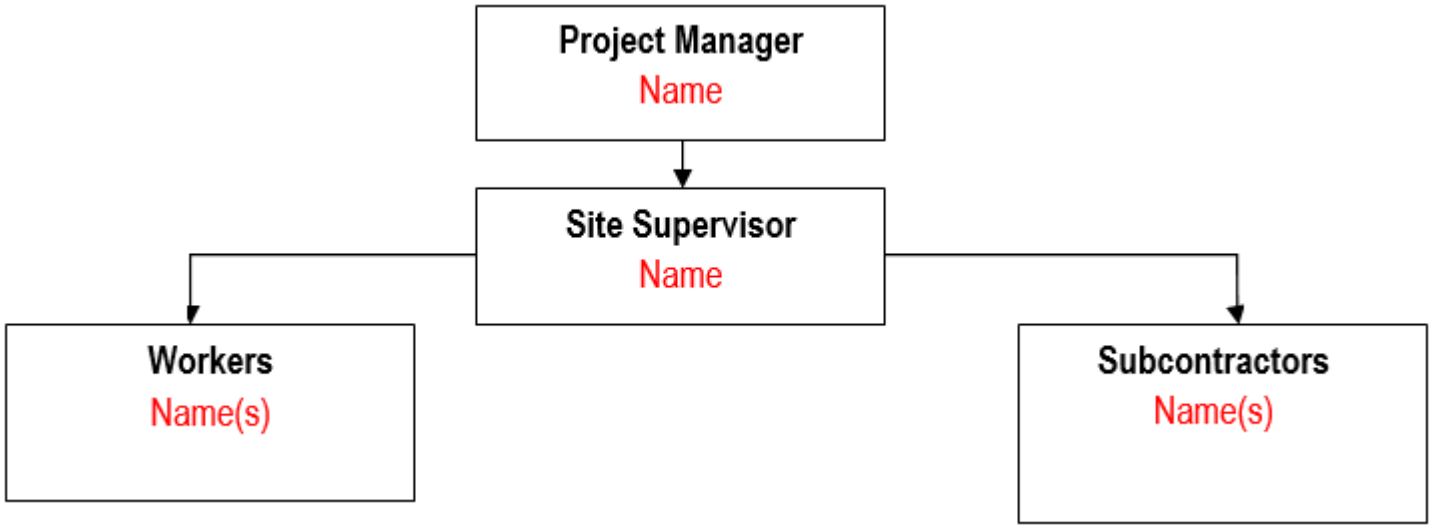

Table 5.1 Project Environmental Roles & Responsibilities Matrix

TASK	Project Manager	Site Supervisor	Workers	Subcontractors
Inducting workers and subcontractors and directing site activities in accordance with the EMP.	2	1	2	2
Identifying, assessing and eliminating any non-compliance or environmentally risky conditions and documenting the risk controls implemented.	1	1	2	2
Promoting and maintaining good environmental management in accordance with the relevant environmental legislation, regulations and laws.	1	1	2	2
Implementing practical measures to ensure the site complies with the EMP and project specifications	2	1	2	2
Maintaining, providing updates and supplying this EMP to relevant authorities and workers.	1	2	2	2
Monitoring and assessing subcontractors for the project to ensure environmental regulations are met and relate to the works undertaken	1	2	2	2
Maintaining stocks for environmental control	1	1	2	1
Provide and maintain a hazardous substance register for hazardous substances used and stored in the workplace;	1	1	2	2

1 = has responsibility for the overall implementation and / or management of the process/procedure on the project
2 = has responsibility for complying with the process/procedure on the project

5.2. Reporting

The Project Manager will ensure control of all project environmental documentation and reports. Adequate records will be maintained to demonstrate conformance to specified environmental requirements. The records to be maintained for this project will include, but not be limited to, the following:

- monitoring records.
- non-conformance, corrective action and preventive action
- complaints management.
- training and induction records.
- audit records.
- permits, licenses, and approvals.

These documents will be maintained within the OH&S – Environmental Plan Folder.

5.3. Environmental Training

All Dragline Cleaning Services Pty Ltd workers who will be working on this project shall receive site-specific induction training. The induction training will include:

- familiarisation with the requirements of this EMP.
- environmental emergency response training; and
- familiarisation with site environmental controls.

Dragline Cleaning Services Pty Ltd may combine the Work Health and Safety (WHS) and Environmental induction into one.

5.3.1. Key Emergency Response Personnel

The site supervisor will be the first point of contact when an incident or spill occurs. Dragline Cleaning Services Pty Ltd's supervisor must then notify the General Manager and appropriate action will be taken.

5.3.2. Hazardous Substances

Dragline Cleaning Services Pty Ltd will maintain an up-to-date register of Hazardous Substances for all materials used on the project (see **Attachment 1**).
Controlled, updated copies of these SDS will be readily available to the General Manager, Supervisor(s), site(s), and client(s) upon request.

5.4. Emergency Response Procedures

5.4.1. Fire Emergency

Steps to manage a fire emergency:

- If safe to do so leave the work area. If unsafe to leave, seek refuge in a safe area immediately.
- Go to the designated Emergency Assembly Area or to a clear/open area.
- Make sure all workers are present and accounted for, do not return to the work area to locate any missing workers; and
- Notify the Site Supervisor and wait for instructions.

5.4.2. Gas Leak Emergency

Steps to manage a gas leakage emergency:

- Call the Site Supervisor immediately, if deemed necessary call the Fire Brigade on **'000'**. If **'000'** does not work on your mobile phone call **'112'**.
- Site Supervisor to immediately arrange to turn off the gas supply.
- Site Supervisor to turn off the site's electrical supply.
- If deemed necessary, notify all persons to evacuate the work area and assemble at the Emergency Assembly Area.
- Control the movement of people to the Emergency Assembly Area.
- Check all workers and others are in attendance; and
- Remain at the Emergency Assembly Area until notified that the area is safe to reoccupy.

5.4.3. Leak of Spill Emergency

Steps to manage any Leak or Spill in a work site:

- Identify the source of the problem.
- Stop goods leaking.
- Contain spilt material, using spills kit or sand.
- Notify officer or Site Supervisor.
- Remove spilt material and place in sealed container for disposal (if possible); and
- Site Supervisor to record incident.

OR

- as suggested on Safety Data Sheet (SDS)

6. Implementation

6.1. Risk Assessment

The risk to the environment of carrying out the project has been considered and documented.

The type and level of risk assessment will vary from project to project. The risk assessment may have been undertaken as part of an environmental assessment document or a condition of approval or consent. Inclusion of a statement noting a risk assessment has been undertaken and/or inclusion of a summary of the outcomes in this section should be sufficient.

Risk assessments would generally comprise the following steps:

- identification of activities to be undertaken as part of the project
- identification of actual and possible environmental impacts
- determination of the level of risk (based on consequence and likelihood or impacts)
- identification of environmental management, controls and monitoring to prevent or minimise the environmental impacts

If a risk assessment has not yet been undertaken for your project, the framework for a risk assessment has been included in Attachment 2 to assist with this process.

6.2. Environmental Management Activities and Controls

The following environmental management activities, mitigation and control measures will be adopted to prevent or minimise environmental impacts.

6.2.1. Air Quality

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Emissions of air pollutants from motor vehicles & plant		
Regular maintenance of machinery. Workers instructed not to leave machinery idling when not in use.	DCS Supervisor	Ongoing during project
Potential Impact: Dust generated from excavations and movement of plant		
Disturbance of site will be monitored and the site will be restored prior to conducting earthworks in new area.	DCS Supervisor	Ongoing during project
Excavated materials will be stocked piled and where possible re-used on site. Excess materials to be disposed of in accordance with the Protection of the Environment Operations Act 1997.	DCS Supervisor	Ongoing during project
Where significant dust is generated, the work area will be watered down.	DCS Supervisor	Ongoing during project

6.2.2. Water Quality

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Contamination of water due to chemicals, fuels or wastes		
Storage of fuels, chemicals and wastes will be clear of stormwater or drainage lines.	DCS Supervisor	Ongoing during project
Safety Data Sheet (SDS) of hazardous substance will be referred to when spills occur.	DCS Supervisor	Ongoing during project
All hazardous substances on site will be recorded in the Hazardous Substances and Safety Data Sheet Registers.	DCS Supervisor	Ongoing during project

6.2.3. Hydrocarbon Materials

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Hydrocarbon or chemical spill (including diesel, lubricating oils, grease, solvents, paints, coolants and flocculant)		
All employees to be advised of the potential impact of hydrocarbons during inductions and toolbox talks.	DCS Supervisor	Ongoing during project
Documentation of record of induction, toolbox talks and training shall be maintained on site.	DCS Supervisor	Ongoing during project
Minimum separation distances between hydrocarbons and other storage facilities and ignition sources shall be maintained.	DCS Supervisor	Ongoing during project
Minimum separation distances between hydrocarbons and other storage facilities and ignition sources shall be maintained.	DCS Supervisor	Ongoing during project
Spill kits shall be readily accessible and maintained at storage and fill/drainage points.	DCS Supervisor	Ongoing during project
Where practical a hardstand location shall be utilised for the draining of spent hydrocarbons.	DCS Supervisor	Ongoing during project
Refuelling of mobile plant and equipment should be undertaken, where feasible, on designated hardstand areas or provided with temporary bunding to contain any spillages	DCS Supervisor	Ongoing during project
Safety Data Sheet (SDS) for all chemicals stored on site and available.	DCS Supervisor	Ongoing during project
Oil water separators for drainage from workshops/washdown areas must be maintained.	DCS Supervisor	Ongoing during project

6.2.4. Community Relations

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Public amenity		
Notification letters will be sent out to nearby residents and owners prior to works commencing. Letters will contain details of works to be carried out, duration of works, working hours and contact details if any issues arise.	Project Manager	Ongoing during project

6.2.5. Traffic

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Parking and access to site		
Nominated parking areas will be allocated on site.	Project Manager	Ongoing during project
Residents and property owners will be notified about the possibility of an increase in traffic.	Project Manager	Ongoing during project

6.2.6. Waste Management

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Unacceptable disposal of site waste		
All material waste will be recorded in the Waste Register.	DCS Supervisor	Ongoing during project
All waste removed from site will be disposed of in accordance with the Protection of the Environment Operations Act 1997 (POEO ACT 1997).	DCS Supervisor	Ongoing during project

Appropriate space will be provided for the temporary storage of garbage, recyclable and compostable waste to ensure separation of waste products.	DCS Supervisor	Ongoing during project
During works, on-going checks will be carried out to ensure correct separation and re-use of recyclable materials is being maintained.	DCS Supervisor	Ongoing during project

6.2.7. Noise

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Unacceptable noise levels and vibrations		
Work equipment will be maintained in good working order to comply with EPA guidelines. Where required, noise suppressors will be installed.	DCS Supervisor	Ongoing during project
Hearing protection will be worn ex. earplugs or earmuffs.	All workers	Ongoing during project
Work will take place during nominated work hours only.	DCS Supervisor	Ongoing during project

6.2.8. Hazardous Materials

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Spills and uses of hazardous materials		
All hazardous and/or intractable wastes are to be disposed of in accordance with relevant Authority and EPA requirements.	DCS Supervisor	Ongoing during project
All hazardous waste removed from site will be disposed of in accordance with the Protection of the Environment Operations Act 1997 (POEO ACT 1997).	DCS Supervisor	Ongoing during project
Safety Data Sheet (SDS) of hazardous substance will be referred to if spills occur.	DCS Supervisor	Ongoing during project
All hazardous substances will be recorded in the Hazardous Substances Register and the SDS recorded in the Safety Data Sheets (SDS) Register.	DCS Supervisor	Ongoing during project

6.3. Environmental Control Plan

The key features of the environmental management for Dragline Cleaning Services Pty Ltd will be accessible at the specific site(s).

6.4. Environmental Schedules

This EMP refers to several environmental schedules comprising forms, registers and checklists. Dragline Cleaning Services Pty Ltd will comply with sites forms, registers and checklists.

- Site Environmental Induction Register
- Site Environmental Inspection Checklist
- Environmental Complaint Form
- Non-Conformance Report Form
- Hazardous Substances Register
- Safety Data Sheets (SDS) Register
- Waste Register

7. Monitor and Review

7.1. Environmental Monitoring

Dragline Cleaning Services Pty Ltd will monitor the environmental controls listed in **Section 6.2** through regular site environmental inspections.

7.2. Environmental Auditing

Planned and documented audits aimed at evaluating the environmental conformance of the project will be conducted by Dragline Cleaning Services Pty Ltd. Any deficiencies identified during the audits shall be documented and actioned in accordance with Dragline Cleaning Services Pty Ltd corrective action process (see **Section 7.5**).

7.2.1. Table 7.1 Project Audit Plan

Audit Type	Frequency	Record	Auditor
Environmental Management Plan	Yearly	Audit Report	General Manager / External Auditor
Sub-contractor Environmental Performance Audit	Yearly	Audit Report	General Manager / External Auditor

7.3. Communication

To minimise impacts on the public by the project, residents and adjacent property owners will be notified in writing before the works commence and at appropriate stages during the project. The letter will contain details of the intended work, the duration of the activities, information regarding any access interruptions and details of whom to contact with questions regarding the work.

Dragline Cleaning Services Pty Ltd will undertake external and on-site communication in case of environmental incidents and emergencies, including communication with subcontractors. External communication will include informing nearby residents of proposed work, incidents and emergencies and contacting regulatory agencies if required.

7.4. Complaints

Community groups, clients, interested parties, etc may advise of practices, activities and processes that are related to the environment by a variety of methods. These may include a non-conformance report, fax/letter, telephone complaint, newspaper/magazine report and verbal protest.

On receipt of a complaint, the person receiving the complaint will notify the Project Manager and the complaint will be recorded. The Project Manager will follow up the complaint and take corrective action as required.

7.5. Corrective Action

A non-conformance occurs when a procedure or environmental control is not followed, or does not perform as required by this EMP. Dragline Cleaning Services Pty Ltd will monitor non-conformances to the EMP and initiate corrective and preventive action where required. All non-conformances will be recorded.

Dragline Cleaning Services Pty Ltd will undertake corrective action in case of incidents that have an environmental impact or works not carried out according to the required standard. Procedures for identifying corrective action include:

- an EMP review.
- investigation into the causes of incidents and recording of the results.
- corresponding outcome with site(s)/client(s); and
- evaluating further environmental risks.

7.6. Environmental Management Plan Review

This EMP will be reviewed by the Project Manager as required to ensure its continuing suitability and to ensure it is conforming to the EMP's environmental objectives and legal requirements. Reviews will be undertaken as necessary as a result of any of the following:

- when there is a change in the scope of the project that requires a change in environmental controls.
- when there is a need to improve performance in an area of environmental impact.
- at the completion of environmental audits as required.
- as a result of changes in environmental legislation applicable and relevant to the project; and
- as required by any site Dragline Cleaning Services Pty Ltd conduct services.

Reasons for making changes to the EMP will be documented. A copy of the original EMP document will be kept for the project records.
The Project Manager is authorised to change and re-issue the EMP. The Site Supervisor is to be informed of any changes made by the Project Manager.

The Site Supervisor is responsible for ensuring the work crew are complying with the current EMP, and for informing the work crew of any changes. The Site Supervisor is responsible for ensuring the workers are aware of changes before starting any works.

Attachment 1: Hazardous Chemical Register

Hazardous Chemical Register

A Hazardous chemical register is a list of all hazardous chemicals used, handled or stored at your workplace. You must keep the current safety data sheet (SDS) with this register and make sure it is accessible to workers. The SDS will tell you how to use and manage hazardous chemicals safely. The supplier of your chemicals should provide a SDS on request. **Note**: Chemicals not classified as hazardous chemicals do not require SDSs and do not need be included in this register.

How can you tell if a chemical is classed as hazardous?

Section 2 of the SDS will tell you if, and how the chemical is hazardous. Other indications are:

- The manufacturer or supplier provided a copy of the SDS with the chemical
- The label of the product includes:
  - diamond-shaped warning pictograms (see right)
  - signal words *Danger* or *Warning*
  - hazard or precautionary statements such as *Toxic if swallowed* and *Wear eye protection*
  - risk or safety phrases such as *Harmful if swallowed* and *Keep out of the reach of children.*

Contact the manufacturer or supplier for more details or for a copy of the SDS. Many companies also provide SDSs online.

Chemical name	Manufacturer *including Australian contact details*	SDS issue date *(must be <5 years)*	Maximum quantity held on site *	Comments

** If quantities stored at the workplace are equal to or exceed the amounts specified in the Work Health and Safety Regulation 2011 Schedule 11, placarding and/or manifests may be required. See worksafe.qld.gov.au for details.*

Attachment 2: Environmental Risk Assessment

The Environmental Risk Rating of an identified impact is measured in terms of consequence (severity) and likelihood (probability) of the event happening.

Risk Assessment Table

Consequence or Impact of Hazard	Risk Level	A	P	U	Likelihood/Probability	Risk Rating
H - Significant detrimental environmental impact, potential death, permanent or long-term disability or illness,	**H** = High	1	1	2	**A** = Almost certain could happen at any time	**1 =** Immediate action is required
M - Short term environmental impact, potential temporary disability or illness requiring medical attention	**M =** Medium	1	2	3	**P** = Possible risk could happen occasionally	**2 =**Control the risks/ hazards a.s.a.p.
L - Minimal environmental impact, potential minor injury requiring first aid	**L** = Low	2	3	3	**U** = Unlikely may happen rarely	**3** =Control risks with routine procedures

Risk Control

Eliminate – 'Design out' the hazard when new materials, equipment and work systems are being purchased for the site;

Substitute - Substitute less hazardous materials, equipment or substances;

Isolate – separate the environment/workers from hazards using barriers, enclosing noisy equipment;

Engineering – use engineering controls to reduce the risks. Make sure that appropriate environmental controls are available and used correctly;

Administrative – Minimise the risk by adopting safe and environmentally appropriate working practices or providing appropriate training, instruction or information;

Personal Protective Equipment – Make sure that appropriate PPE is available and used correctly.