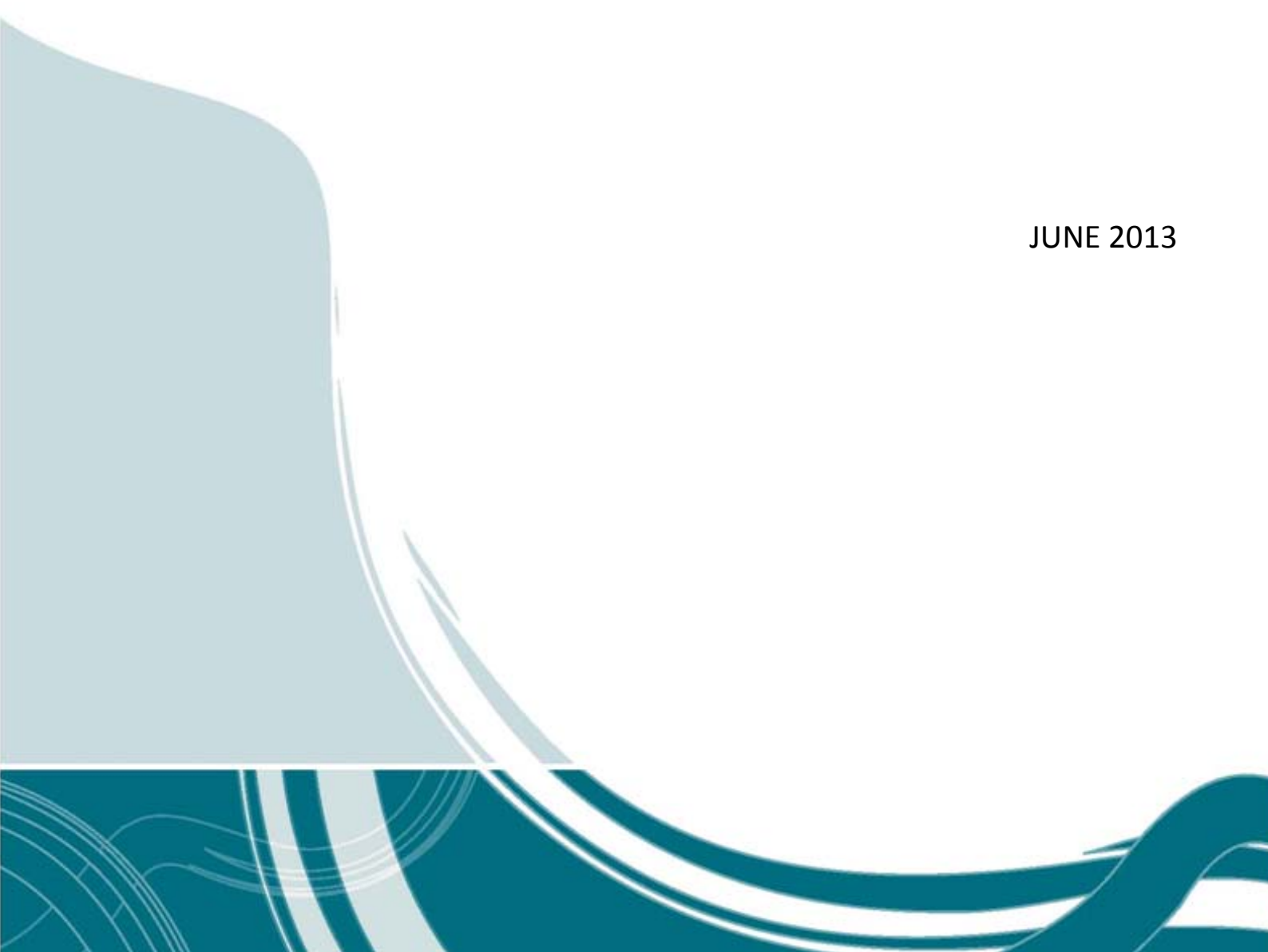


Independent Environmental Audit Report

GOOGONG TOWNSHIP WATER CYCLE PROJECT

JUNE 2013



Independent Audit

Audit Report Number: 1

AUDITED ORGANISATION	PROJECT
Googong Township Pty Ltd	Googong Township Water Cycle Project Stage A (West)
LOCATION OF AUDIT	DATE OF AUDIT
Site Office - Googong Project Office – City	4 th June 2013
DEPTH OF AUDIT	SCOPE OF AUDIT
Environmental	Meet the requirements of CoA A18(b) Specifically, compliance with: <ul style="list-style-type: none">• Project Approval• Woden Contractors CEMP• Subcontractor plans
AUDIT CRITERIA	AUDIT DETAILS
NSW Project Approval	Site Office - Googong Opening Meeting – 4/6/13, 8:30am – Site Office Site Visit and Inspection 9:00am-10:30am Review of Contractors Documentation 10:30am – 1:00pm Project Office - City Review of Googong Township Pty Ltd Documentation (2:00pm – 4:00pm) Closing Meeting – 4/6/13, 4:30pm – Project Office
PROJECT REPRESENTATIVES PRESENT	AUDIT TEAM
James Clouten, Matthew Lau Woden Contractors Representatives	Erwin Budde, nghenvironmental – Lead Auditor Nicole Isles, nghenvironmental – Observer / Assistant Auditor
AUDIT REPORT	
An Audit Report will be submitted within 21 days of completion of the audit	
PREVIOUS AUDIT DATE	PREVIOUS AUDIT REFERENCE
None	None

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1. REPORT SUMMARY

1.1 INTRODUCTION

This audit represents an independent environmental audit conducted at the Googong Township Water Cycle Project (GTWCP).

At the time of the audit, the following works were being undertaken alongside standard everyday works of the Project:

- Trench excavation for piping
- Installation of sewer storage tank system

1.2 SCOPE OF AUDIT

The scope for this audit was:

1. Compliance with the project's conditions of approvals, licences and permits
2. Review of the Project Management Plans, procedures and processes and compliance with this system of documents
3. Onsite implementation of Project environmental management documentation

The following approvals, licences, permits and standards were audited:

- Project Approval MP 08-0236
- EPL 20188
- Management Plans
 - Soil and Water Management Plan
 - Hazards, Risk and Safety Management Plan
 - Traffic Management Protocol
 - Noise and Vibration Management Plan
 - Flora and Fauna Management Plan
 - Heritage Management Plan
 - Waste Management Plan
 - Air Quality Management Plan

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1.3 SUMMARY OF CORRECTIVE ACTIONS

CAR No.	Section of Report	Details
1	3.2	The Environmental Protection Licence (EPL) 201388 is not detailed or addressed in the Project CEMP.
2	3.11	A review of consistency with the Project Approval could not be demonstrated for the establishment of the additional access track.

1.4 SUMMARY OF OBSERVATIONS OF CONCERN

The following Observations of Concern (OoC) were identified and explained to Woden Contractors and Googong Township Pty Ltd (GTPL) during the audit Closing Meeting. They are considered to be deficiencies in meeting specified requirements.

OoC No.	Section of Report	Details
1	3.1	There is some absence of environmental controls in the SWMS
2	3.1	There is a visible disconnect between the CEMP and associated documentation and the documentation used on site.
3	3.5	Project signage is reasonably complex due to the complex nature of the contracts and the works. There is a risk of a failure in the management of a complaint due to the multiple complaint pathways.
4	3.6	Lack of a quality review process for the ESCP poses a risk to potential failure of controlled or implementation of inappropriate controls.
5	3.6	A duplicate dewatering procedure has been developed that does not address all those processes detailed in the approved procedure.
6	3.10	The diesel generator container and associated diesel fuel cell are not bunded and there are no dangerous goods labelling or signage on the container to indicate nature of contents as required by AS1940.

1.5 SUMMARY OF OPPORTUNITIES FOR IMPROVEMENT

The following Opportunities for Improvement (OFI) identified and explained to Woden Contractors and Googong Township Pty Ltd (GTPL) during the audit Closing Meeting. They are considered to be suggestions for improvements to better meet specified requirements.

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OFI No.	Section of Report	Details
1	3.7	Proof of compliance with blast criteria is through extrapolation of results only. Suggest future blasting includes monitoring at the actual nearest residence.

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2 AUDIT PROCESS

2.1 OPENING MEETING

An opening meeting was held on the morning of the 4th June, attended by Daniel Steenbergen and Therese Kelly of Woden Contractors.

2.2 CLOSING MEETING

An informal closing meeting was held onsite with Daniel Steenbergen and Therese Kelly after the completion of the site inspection on 4th June. An additional closing meeting was held in the afternoon of the 4th April, at the GTPL Project office, attended by Jamie Clouton and Matthew Lau.

2.3 SITE INSPECTION

A site inspection was conducted on the morning of the 4th June. In attendance were Daniel Steenbergen, Therese Kelly, Jamie Clouton and Matt Hunter.

2.4 DESIGNATED FOLLOW-UP

A follow-up of the audit findings will be managed by GTPL to verify the completion of all corrective actions.

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3 DETAILS OF AUDIT FINDINGS

3.1 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

The CEMP requires Environmental Work Method Statements (EWMS) to be prepared, however Safety Work Method Statements (SWMS) are used instead. SWMS's contain environmental control measures where relevant such as waste disposal and spill response requirements. Environmental control measures are specific for the task. There is some absence of environmental controls in the SWMS e.g. operating of machinery and excavation of material, noise impacts to the environment and not just to the operator.

Observation of Concern 1.

Weekly site inspections, using 'PMF36 Site Inspection Report', are undertaken and cover the broader Project including environmental aspects. Weekly inspections are undertaken by Therese Kelly (OH&S Representative). Monthly spot audits are also undertaken and cover such environmental aspects as spill response kits inspection and is counter signed by the Project Manager.

The CEMP notes that a risk register will be developed as part of a workshop. A risk register was issued on 21/03/2013.

The Environmental Representative (ER) undertakes fortnightly inspections of site. A register of corrective actions from these audits and their close out are maintained.

GTPL prepared a CEMP, which was approved by the Department of Planning and Infrastructure. Woden have elected to adopt the GTPL CEMP, and in doing so have made contract-specific changes to the GTPL CEMP (eg names and responsibilities of staff). These changes were endorsed by the ER and were considered not substantial enough to seek re-approval from DoPI.

This audit found that CEMP being used on site is not complete; particular appendices are missing such as the Legal and other requirements register and the Environmental Policy. Additional documentation has been prepared for use on site, which is not linked back to the CEMP or has not replaced procedures and forms contained in the CEMP. This has led to a disconnect between the CEMP and the documentation used on site. Examples include:

- A separate dewatering procedure has been developed and is used on site as opposed to using the Department of Planning and Infrastructure (DoPI) approved dewatering procedure contained in the CEMP
- SWMS have been prepared instead of EWMS
- The Risk Register being used by Woden is not the Risk Register contained in the CEMP
- The Legal Register being used is different to that contained in the CEMP.

Observation of Concern 2.

A compliance tracking program, as required by CoA A18, is being adequately maintained and a 'Pre-Compliance Report' dated October 2012 has been submitted to DoPI. No documentation that the 'Pre-Compliance Report' was submitted to DoPI could be located.

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3.2 APPROVALS, LICENCES AND PERMITS

Work hours have been limited to those detailed in the Project approval. Detail of work hours are covered in the 'Site Induction'. High noise generating activities are not undertaken before 8am in the morning and machines/equipment are not started before 7am.

Section 138 for occupation of the road by traffic control is the only additional permit that has been obtained as part of the Project.

The Environmental Protection Licence (EPL) 201388 was issued for the project. The EPL relates to the operation of sewerage infrastructure, but includes some construction conditions relating to blasting. The EPL is not detailed or addressed in the Project CEMP (note, it is only mentioned in the SWMP, even though the EPL does not relate to soil and water). In addition, site project staff seemed unaware that the project was subject to an EPL. Lack of awareness of the existence of an EPL poses a significant risk. A copy of the EPL is not maintained or accessible on site as required by EPL Condition 6. **Corrective Action Request 1.**

3.3 TRAINING, AWARENESS AND COMPETENCE

Toolboxes are undertaken on a weekly basis at 7am on Thursday. Records of these toolboxes are maintained in the 'Toolbox Talk Meeting Record' Book. A toolbox conducted on 31/01/2013 included awareness of Pink Tailed Worm Lizard (PTWL) and toolbox conducted on 07/02/2013 included heritage awareness.

3.4 EQUIPMENT MAINTENANCE

Pre-starts are undertaken daily and copies are forwarded to the workshop manager. Maintenance is managed by the workshop manager and is conducted as per manufacturer's handbook. The pre-start book for Loader, Plant No. L17 was inspected. Faults identified by the operator are entered into a register. These faults are prioritised by the workshop manager and maintenance works are scheduled as required and as per the recommendations in the manufacturer's handbook.

3.5 COMMUNITY AND COMPLAINTS

No community complaints have been received by the Project site team or GTPL.

Project Approval Condition A15 (CoA 15) requires the telephone number, postal address and email address be displayed on a sign near the entrance to the construction site. Several different signs throughout the Project site are displayed. The display of this information could possibly be located in more obvious and higher trafficked locations. Although there is complexity in the complaints/enquiries handling process, there appears to be adequate advertisement and display of contact information for the Project. This complexity does, however, pose a risk that complaint handling may fail. **Observation of Concern 3**

Two websites exist for the Project: <http://compliance.googong.net> and www.googong.net and are both available to the public. The first website contains all the approval documents for the Project.

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Publicly available documents are made available on the Project websites; however it was decided by the Project only to make documents requiring approval publicly available only.

Pre-construction notification via a newspaper advert was placed in October 2012. Door knocks for Googong Road residence and letterbox drops for Old Cooma Road residence were also undertaken. The commencement of construction newspaper notification was placed in January 2013 with the next notification due in July 2013.

A 'Stakeholder Contact Register' is maintained and includes detail such as when notifications were sent out.

3.6 SOIL AND WATER

Erosion and Sediment Control Plans (ESCP) are developed by Project Manager and Foreman and reviewed by the ER or Jamie Clouten. A register is maintained for the ESCP revisions and revision details are maintained on drawings. However, as the approval/review process is essentially a paperless trail it is difficult to determine which ESCP's have been reviewed and approved. The register is signed by the Project Manager and according to the CEMP no further review or approval is required. Lack of a quality review process poses a risk to potential failure of controlled or implementation of inappropriate controls. **Observation of Concern 4.**

A dewatering procedure was developed by Woden prior to the commencement of dewatering on the Project. No visible signs of contamination were noted in the discharge water and water was pumped into a tanker and disposed of within the earthworks. The water was unable to leave site. A dewatering procedure already exists in the SWMP which is approved by the Department of Planning and Infrastructure. There is a notable difference between the procedure developed by Woden and the procedure that is approved as part of the SWMP. Developing a duplicate dewatering procedure that does not address all those processes detailed in the approved procedure creates a risk of breaching of the Project approved CEMP. **Observation of Concern 5.**

The SWMP details discharge quality criteria, however at this stage no water has been discharged offsite.

A standard checklist, 'Erosion control report', for weekly inspection and are undertaken on a Friday. Additional inspections are undertaken after greater than 15mm rainfall event. Inspections are usually undertaken by the Project Foreman. Inspection checklist does not indicate when actions are closed out.

The compensatory water supply requirement specified in CoA B3 has not been triggered as no entitlements appear to have been triggered.

3.7 NOISE AND VIBRATION

Blast reports are provided by the Blast contractor for every blast (Tablelands Explosives). Monitoring is conducted at the nearest sensitive structure or sensitive receiver. Blasting undertaken on the 15/03/2013 and monitoring was undertaken at a nearby manhole, however no monitoring was undertaken at sensitive receivers as the Blast contractor determined that all sensitive receivers were outside the impact zone.

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No monitoring has been undertaken at sensitive receivers, as there are no sensitive receivers within 200m of the Project. The absence of monitoring at sensitive receivers means that Woden cannot adequately show that they are adhering to CoA C12. However, actual monitoring records for distances less than 100m from the blast site can be extrapolated to show that the blast overpressure and vibration limits would most likely have not exceeded limits set in CoA C12. Future monitoring could be improved by placing a logger at the nearest residence. **Opportunity for Improvement 1**

As required by CoA C13, residence and council have been notified two (2) weeks prior to blasting. Queanbeyan Council has approved all blast plans prior to undertaking blasting.

3.8 AIR QUALITY

Dust hazards are detailed in relevant SWMS's. Watercarts are used to suppress dust on site.

3.9 FLORA AND FAUNA

Mechanical weed control was undertaken prior to stripping (January). The Biosis ecologist assisted in identification of weeds prior to weed control being undertaken.

Biosis were engaged to provide a qualified ecologist to supervise the felling and removal of two (2) hollow bearing trees (HBT). Two (2) nest boxes were installed to subsidise the loss of these hollows. Email style reports were provided by the Biosis ecologist on 17/01/2013 and 22/01/2013.

A formal report dated 29/01/2013 was submitted to GTLP by Biosis detailing the clearing of HBT and installation of nest boxes. This reported included detailed

Non-HBT's were removed first and HBT's were tapped with an excavator bucket and removed 24hours later. A pre-clearing survey was undertaken on 01/01/2013 and 02/01/2013 and clearing undertaken on 18/01/2013 and 22/01/2013.

As part of CoA B14, the Proponent is required to establish and maintain a dedicated area of land on the Project for the conservation of the Pink-Tailed Legless Lizard. An area east of the sewage pumping station (SPS2) has been identified; however this is outside the scope of this audit.

3.10 CHEMICAL, DANGEROUS GOODS & OTHER POTENTIAL CONTAMINANTS

No contaminated sites are present on this part of the Project.

The diesel generator container which includes a diesel fuel cell is not bunded and there are no dangerous goods labelling or signage on the container to indicate nature of contents as required by AS1940.

Observation of Concern 6.

3.11 PROJECT ALTERATIONS

Two (2) Project alterations have occurred, these includes the installation of an additional access track and relocation of the site compound.

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A consistency review for the relocation of the compound was completed by Manidis Roberts, in accordance with the procedures contained in the CEMP. The compound is located outside the approved Project boundary, however remains on GTLP land. The relocation of the compound creates potential for impacts outside of the Project boundary that was not initially assessed by the Environmental Assessment. Biosis study area does not encompass this area in their assessment of potential impact.

A review of consistency with the Project Approval was not undertaken for the establishment of the additional access track. However advice provided by the ER notes that a temporary access track would not require a formal alteration of the Project if the access track was adequately rehabilitated. It is considered that, given the project is approved under Part 3A, any changes to the approval should be assessed under that Part. Demonstration of consistency is therefore advisable, and the lack of this poses a significant risk to the project. **Corrective Action Request 2.**

3.12 SPECIFIC PROJECT REQUIREMENTS

CoA A5 requires a Staging Report to be submitted prior to the commencement of construction. A Staging Report dated June 2012 was submitted and satisfies the CoA A5. A letter dated May 2012 shows evidence the Staging Report was submitted to DoPI.

CoA A11 requires that detailed design and construction of the Project is undertaken in consultation with Council (Queanbeyan City Council (QCC)). QCC has been consulted through independently chaired workshops for each discrete stage of the Project.

The Project Approval notes under CoA A12 that under Part 4A of the *EP&A Act*, the Proponent is required to obtain construction and occupation certificates for the proposed building works. To date no buildings have been erected.

CoA C14 requires the Proponent to assess the condition of the roads and footpaths which may be potentially impacted by construction of the Project. A Road Dilapidation Report was prepared by Cleary Brothers for the subdivision aspects of the project, which included Googong Dam Road (note, the subdivision aspects of this project are not part of the Part 3A project to which this Audit was restricted). For the purposes of meeting this Clause, it is considered that this road dilapidation report is adequate.