





# Jemena

## Port Kembla Pipeline Project

### UNEXPECTED CONTAMINATED LAND FINDS PROCEDURE

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## REVISION HISTORY

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Date	Rev	By	Description
1/8/2022	1	BRO	Update of Emergency Contact details for Approvals consultation
28/9/2022	2	BRO	Update following AIE Review (Site Auditor)
18/11/2022	3	BRO	Updated following DPE Review

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## LIST OF EMERGENCY AND KEY CONTACTS

Table 1 – Emergency and Key Contacts

Organisation/Position	Contact Details
Environment Line (EPA Pollution Hotline)	131 555  The Environment Line handles general inquiries about environmental issues and takes reports of pollution for which the EPA has regulatory responsibilities. Environment Line is a one-stop pollution and environmental incident reporting service provided by Environment and Heritage Group and EPA.
Fire and Rescue NSW	000 (for pollution incidents that present an immediate threat to human health or property)  1300 729 579 (for pollution incidents that do not present an immediate threat to human health or property)
Wollongong City Council	General Enquiries (02) 4227 7111
NSW Ports	General Enquiries 1300 922 524
Port Authority NSW	24-hour community enquiries and complaints line (02) 9296 4962 enquiries@portauthoritynsw.com.au
Port Kembla Coal Terminal	Administration (02) 4228 0288
BlueScope	Laura Davis <a href="mailto:Laura.davis@bluescopesteel.com">Laura.davis@bluescopesteel.com</a> +61 467728547
Transport for NSW	General Enquiries (02) 8202 2200
GrainCorp	Dylan Clarkson +61 409 739 697 <a href="mailto:dclarkson@graincorp.com.au">dclarkson@graincorp.com.au</a>

Organisation/Position	Contact Details
AIE	Andrew Petch +61 401 175 917 <a href="mailto:Andrew.petch@ausindenergy.com">Andrew.petch@ausindenergy.com</a>
Jemena	Community Feedback - 1300 081 989 Justin Anderson 0435 092 889 <a href="mailto:justin.anderson@zinfra.com.au">justin.anderson@zinfra.com.au</a>
Nacap	Jason Heard Nacap Project Manager <a href="mailto:j.heard@nacap.com.au">j.heard@nacap.com.au</a> +61 488 087 393

## ACRONYMS

Table 2 – Acronyms

Term	Meaning
AEC	Areas of Environmental Concern
AIE	Australian Industrial Energy
ASS	Acid Sulfate Soils
ASSMP	Acid Sulfate Soils Management Plan (Soil and Water Management Plan – Appendix G)
CEMP	Construction Environmental Management Plan
CoA	Conditions of Approval
CROW	Construction Right-of-Way
EA	Environmental Assessment
ECI	Early Contractor Involvement
EES	Environment Energy and Science
EMM	Environmental Management Measures

Term	Meaning
EPA	Environment Protection Agency
GIS	Geographical Information Service
HSE	Health Safety Environment
KGMS	Kembla Grange Meter Station
LECH	Land, Environment and Cultural Heritage
NSW	New South Wales
PASS	Potential Acid Sulfate Soils
PKGT	Port Kembla Gas Terminal
PKPP	Port Kembla Pipeline Project
Principal	Jemena
PM	Project Manager
RAP	Remediation Action Plan
SSI	State Significant Infrastructure
SWMP	Soil and Water Management Plan
SWMS	Safe Work Method Statements
UFPC	Unexpected Finds Procedure Contamination (This Procedure)

## GLOSSARY

Table 3 – Glossary

Term	Meaning
Company/Principal	Jemena
Contractor	Nacap
Environmental Assessment	Refers to environmental assessment undertaken in accordance with the approval and subsequent Modifications of SSI 9471 and SSI 9973.

Term	Meaning
Incident	A set of circumstances that: <ul style="list-style-type: none"> <li>&gt; causes or threatens to cause material harm to the environment; and/or</li> <li>&gt; breaches or exceeds the limits or performance measures/criteria in this approval</li> </ul>
Project	Port Kembla Pipeline
Regulatory Requirements	Government acts and regulations that are environment specific which prescribe legal obligations encompassing the employer and contractor.
Risk	Effect of uncertainty on objectives. Often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated likelihood of occurrence [ISO Guide 73:2009, definition 1.1]
Stakeholder	Party with vested interest in the works
Third Party	Any party external to the works that has been identified as a stakeholder
Unexpected contamination find	Can be defined as any unanticipated discovery of contamination, that has not been previously assessed and recorded.

## 1 INTRODUCTION

### 1.1 Purpose and Scope

This Unexpected Contaminated Land Finds Procedure (UFPC) supports the purpose and objectives outlined in the Construction Environmental Management Plan (CEMP) GAS-599-PA-EV-001 and the Soil and Water Management Sub-plan (SWMP) GAS-599-PA-EV-007 and is applicable for project based construction activities to ensure that all reasonable and practical measures are undertaken to minimise the potential for environmental harm and impacts to human health.

This UFPC is an Appendix of the SWMP and has been prepared to satisfy the requirements of both SSI 9471 and SSI 9973 including the staging of works as described in Section 1 of the CEMP and as presented in the table below.

*Table 4 - UFPC scope relevant to SSI-9471 and SSI-9973*

Infrastructure Approval	Post Consent Stage	Description of Works	Segment of Works As detailed in Sect 1.4 and Figure 1
SSI-9471	Stage 3	Pipeline construction from PKGT to KGMS	Segment 1.1
SSI-9973	Stage 1		Segment 1.2
			Segment 2

### 1.2 References

The following are principal documents referenced in this document:

*Table 5 - Reference Documents*

Document No.	Title of Document
GAS-554-AC-PM-001	SSI 9471 - Port Kembla Gas Terminal - Infrastructure Approval
GAS-556-AC-PM-001	SSI 9973 - Port Kembla Lateral Looping Pipeline – Infrastructure Approval including Modification 2
GAS-556-SP-PL-007	Construction Specification
GAS-551-SW-PL-001	Pipeline Construction Scope of Work
GAS-599-PA-HSE-004	Environmental Management Plan
GAS-554-RP-GI-002	Geotechnical and Contamination Investigation Interim Report
GAS-556-RP-GI-001	Geotechnical and Contamination Investigation Report
	AIE PKGT Environmental Impact Statement (GHD) 2018
GAS-599-RP-RA-007	Jemena Eastern Gas Pipeline Looping Modification Report (Coffey) 2020
	AIE PKGT Contaminated Spoil Protocol Stage 2A Marine Berth Construction and Onshore Receiving Facilities (GHD) 2021

### 1.3 Principal Contractor Details

*Table 6 - Principal Contract Details*

#### Nacap Details



Business name:	Nacap Pty Ltd
Address:	Ground Floor, 599 Doncaster Road, Doncaster Victoria 3108
ABN:	33 006 306 994
Main phone number:	03 8848 1888
Contact person:	Jason Heard Nacap Project Manager
Contact mobile:	+61 488 087 393
Contact email:	j.heard@nacap.com.au

## 1.4 Environmental Management System Overview

The environmental management system overview is described in Section 4.1 of the CEMP. This UFPC and SWMP used together with the CEMP, and subordinate project documents, procedures, resources, and practices will inform and guide Nacap personnel and subcontractors to ensure that all reasonable and practical measures are taken to manage contamination risks for the Project.

## 2 ENVIRONMENTAL PLANNING AND GOVERNANCE

The legislation, Conditions of Approval (CoA) and Environmental Management Measures (EMMs) relevant to this UFPC are outlined in Section 2 of the SWMP GAS-599-PA-EV-007.

## 3 EXISTING ENVIRONMENT

The existing Project environment is outlined in Section 3 of the SWMP GAS-599-PA-EV-007.

In relation to Section 3 of the SWMP, Contamination and Acid Sulfate Soils, the following was identified based on the Project Environmental Assessment (EA):

### 3.1 Contamination

A high-level assessment for contamination was undertaken during the EA and determined that no widespread or gross contamination was found, however there is considered to be a moderate potential for contamination based upon the nature of the fill material and potentially contaminating activities across the pipeline alignment associated with or resulting from surrounding industry.

The pipeline alignment through the Port area is within areas of highest concern. The project EA identified four areas of environmental concern (AEC) within the Port:

- > AEC 1 - Fill materials along the entire pipeline alignment including dredged materials, coal and coal by-product, steel production by-product (slag) and possible building demolition materials
- > AEC 2 - Spills and surface application of fuels along the entire pipeline alignment, oils and other chemicals associated with current and former industrial land uses
- > AEC 3 - Historical impacts associated with former nightsoil depot within PKCT, and
- > AEC 4 - Current and historical impacts associated with use of land adjacent to the alignment as workshops and fuel depots.

The remaining works outside the Port are generally within land used by or in proximity of Port associated industries where there may be a risk of unexpected finds along the alignment being encountered. Potential sources of contamination (areas of environmental concern) were identified along the pipeline alignment outside of the Port being:

- > Fly-tipped waste (including suspected bonded and friable asbestos containing material)
- > Uncontrolled fill
- > An infilled drainage channel
- > Previously demolished buildings
- > Stockpiles of unknown origin, and
- > Groundwater at 243A Princes Highway, Unanderra.

### 3.2 Acid Sulfate Soils

Acid Sulfate Soils (ASS) are naturally occurring soils containing iron sulphides which on exposure to air, oxidise and create sulfuric acid. Disturbance of ASS and/or Potential Acid Sulfate Soils (PASS) can result in adverse impacts on surface and groundwater quality, flora and fauna and their habitats.

The project environmental assessment (EA) identified that ASS was found to occur in natural estuarine sediments particularly where dark grey and green clays are observed. Estuarine sediments exist within estuarine areas within the Port area and are mapped as high probability of ASS. The pipeline alignment may intercept estuarine sediments during works associated with crossing of Gurungaty Waterway, and Allans Creek. Unexpected finds along the alignment may also be encountered.

Outside the Port area there were two areas within the alignment mapped as being Class 5 for acid sulfate soils:

- > Approximately 550 m extending west from Five Islands Road, and
- > The remaining 1.5km of the alignment at Kembla Grange.

Whilst Class 5 Acid sulfate soils do not typically contain acid sulfate soils, they are located within 500m of highly probable acid sulfate soils on adjacent land.

## 4 UNEXPECTED CONTAMINATED LAND FINDS MANAGEMENT

### 4.1 Unexpected Contamination Management

Nacap is responsible for management of unexpected contamination during pipeline construction and ensuring compliance with all applicable legislation for the minimisation of environmental harm and protection of human health.

The preferred management approach for known contamination sites is avoidance. During construction the process for avoidance will be achieved as follows:

- > The pipeline alignment and all associated infrastructure will be located to ensure all known sites are avoided with sufficient buffer to enable the implementation adequate delineation and protection from all aspects of the works.
- > Preparation of Environmental Control Plans (ECPs) will be undertaken in advance of construction. ECPs will outline the location of all known contamination sites identified in the EA that may be encountered by pipeline construction works and provision of required protective measures and details of specific buffer distances to demonstrate avoidance
- > Ongoing review, update and communication of any changes to the Project contamination assessment and register of known contamination sites in advance of construction commencement

- > Update or develop Environmental Control Plans as required upon detection of new sites of contamination or as outlined in any remediation works plans developed in advance of construction
- > Identification, protection and establishment of separation buffers for known contamination sites during works set out and establishment, and
- > Development and implementation of contingency measures including an unexpected contamination land finds procedure.

Contamination discovered as unexpected finds during construction will be managed in accordance with the unexpected finds procedure as described in Section 4.4 and Attachment 1.

Nacap will support Jemena throughout construction and provide support for ongoing consultation with landholders and stakeholders to ensure sites of known contamination are avoided and where avoidance cannot be achieved, implement appropriate management measures to minimise harm and comply with the relevant legislation and project approvals.

## 4.2 Roles and Responsibilities

An Organisation Chart will be developed prior to the commencement of construction and can be found in GAS-599-RC-AD-001. Refer to Appendix A of Project Management Plan (GAS-599-PA-PM-015) for Organisation Chart for ECI Phase. Position descriptions describe the responsibilities specific to positions on the Project.

Table 7 below provides a summary of Nacap UFPC responsibilities for relevant roles.

*Table 7 - Nacap UFPC Responsibilities*

Role	Responsibilities
Project Director (Management Representative)	<ul style="list-style-type: none"> <li>&gt; The Project Director provides environmental leadership and ensures that adequate, competent and experienced resources are provided and supported in the implementation of the CEMP and this UFPC.</li> </ul>
Project Manager	<ul style="list-style-type: none"> <li>&gt; Provide support and guide in the implementation of this UFPC and associated controls</li> <li>&gt; Provide management and leadership in the implementation of this UFPC</li> <li>&gt; Ensure adequate resources are provided for implementing and maintaining environmental controls and mitigation measures in relation to contamination.</li> <li>&gt; Take action including the stopping of work in response to natural events and activities which may impact on sites of known contamination or compromise the performance objectives, standards and commitments contained in the CEMP and this UFPC, and</li> <li>&gt; Take action in the event of an environmental emergency and allocate the required resources to minimise environmental impact and harm resulting from contamination.</li> </ul>
Lands, Environment and Cultural Heritage (LECH) Manager	<ul style="list-style-type: none"> <li>&gt; Provide support and guide the implementation of this UFPC and associated controls</li> <li>&gt; Provide environmental input and support to construction and associated methodologies</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>&gt; Support and guide site environmental incident investigation and reporting, and</li> <li>&gt; Review internal and external project audits and coordinate the implementation of audit recommendations.</li> </ul>
Specialist Consultants	<ul style="list-style-type: none"> <li>&gt; Providing assessment and interpretation of contamination management and unexpected finds as required</li> <li>&gt; Undertaking site assessments in support of construction works as required, and</li> <li>&gt; Providing support to incident investigation and reporting as required.</li> </ul>
Environment Advisor	<ul style="list-style-type: none"> <li>&gt; Provide and coordinate monitoring, inspections and audits of works</li> <li>&gt; Provide and coordinate site-based training preparation and delivery</li> <li>&gt; Routine record keeping and reporting in support of commitments in this UFPC</li> <li>&gt; Reporting of hazards and incidents and implementing any rectification measures, and</li> <li>&gt; Provide site based environmental incident investigation and reporting and corrective action management.</li> </ul>
Project Supervisors	<ul style="list-style-type: none"> <li>&gt; Provide leadership for the implementation of commitments contained in this UFPC, and</li> <li>&gt; Reporting of hazards and incidents and implementing any rectification measures.</li> </ul>
Subcontractors	<ul style="list-style-type: none"> <li>&gt; Subcontractors engaged to perform works on behalf of Nacap will operate in accordance with all applicable legislation, Nacap procedures and this UFPC, and</li> <li>&gt; Subcontractors are required to report all incidents to their Nacap Supervisor immediately.</li> </ul>
All Project Personnel and Visitors	<ul style="list-style-type: none"> <li>&gt; All Project personnel and visitors will uphold a general environmental duty to take all reasonable and practical measures to ensure that the activities on the whole site do not cause or may cause environmental harm and impacts to human health.</li> </ul>

### 4.3 Project Inductions

All construction personnel and subcontractors are required to undertake a Project induction which will incorporate information on soils and water management specific to the project and field of operations and shall include the following:

- > Environmental protection Legislation
- > Roles and Responsibilities for soil, water and unexpected finds management
- > Information on the location of existing soils and water sensitivities, and sites of known contamination in proximity to the works

- > Information relating to the identification of soil contamination – such as staining, odours, a marked / abrupt change in soil colour, soils with an oily feel or appearance, a slick / sheen on seepage or ponded water, buried waste products or other physical evidence, or patches of dead / stressed vegetation
- > The requirement to immediately report all soil contamination, both pre-existing soil contamination encountered during project activities and incidents resulting in project-generated soil contamination.
- > Mitigation management measures including erosion and sediment controls, storage of hydrocarbons and chemicals, waste, containment and spill management
- > Protocols for responding to unexpected finds of contamination
- > Incident reporting and record keeping.

A register attendance at all inductions will be maintained. A register attendance at all inductions will be maintained

#### 4.4 Unexpected Finds Procedure

The following Unexpected Finds Procedure will be implemented in the event that any unexpected contamination is discovered during the conduct of activities associated with pipeline construction works.

Table 8 - Unexpected finds procedure and Management actions/measures

No	Action
<b>Pre-Construction</b>	
C01	All personnel will undertake the Project induction as described above.
C02	All construction personnel and subcontractors will participate in Safe Work Method Statement (SWMS) development that will include information on environmental sensitivities and specific management measures for specific construction activities.
C03	Environmental Control Plan (where required) with locations of all known contamination within the Project activity area is to be located at site notice board(s) and attached to the authority to commence construction (Form 2). Environment Control Plan(s) will also be communicated at daily pre-starts and weekly toolboxes as required or when works are planned in proximity to known sites of contamination.
C04	<p>Prior to project works the Project Manager or delegate shall:</p> <ul style="list-style-type: none"> <li>&gt; Verify all sites of known or potential contamination</li> <li>&gt; Ensure completion of delineation and establishment of the approved work areas and No Go Zones etc. using flagging/markers/fencing and signage</li> <li>&gt; Ensure notification of specific access or approval conditions, environmental sensitivities and all identified No Go Zones and other significant information is contained in the authority to commence works (Form 2), and</li> <li>&gt; Ensure establishment of photo points and capture pre-disturbance photo records of all known contamination sites.</li> </ul>
<b>Construction</b>	
C05	The approved disturbance area established as the final alignment and /or site boundaries, approved accesses and environmental “No Go” zones will be surveyed and clearly marked on-ground or through the use of tape or barrier fencing and signposting to define the works area and prevent the inadvertent disturbance or access to unauthorised areas beyond the approved boundaries. Surveys and peg-out will be based on digital data as per the Project final layout survey.
C06	Make use of existing disturbance for project layout as far as practicable, including access routes and other ancillary workspaces; negotiate with third parties for use of existing disturbed areas where necessary.
C07	All construction activities will be confined to the established and delineated approved works area and construction access tracks / roads. In doing so avoid unnecessary disturbance to areas that may yield contamination.
C08	<b>In the event of a contamination unexpected find during works, cease the work activity in proximity to the find immediately and notify the Supervisor.</b>
C09	<b>Immediately contact the environmental advisor and assess the likelihood of contamination.</b>
C10	<p>The presence of potentially contaminated material can be detected where material is uncovered which displays some or all of these characteristics:</p> <ul style="list-style-type: none"> <li>&gt; Unusual odour from soils that are not detected in other similar areas</li> <li>&gt; Discolouration or staining of soil or rock</li> <li>&gt; Seepage of unusual liquids from soil or rock</li> <li>&gt; Unusual odours, sheen or colour on groundwater and/or surface water</li> <li>&gt; Unusual metal objects</li> </ul>

No	Action
	<ul style="list-style-type: none"> <li>&gt; Unexpected underground storage tanks, buried drums or machinery etc.</li> <li>&gt; Presence of waste or rubbish above or below ground</li> <li>&gt; Potential asbestos containing material</li> </ul>
C11	Where these factors are identified and following consultation and confirmation from the environmental advisor, the material is considered to be possibly contaminated – progress the procedure and actions from <b>C13</b> below.
C12	Should the environmental advisor assess the material as not being an unexpected find, continue works and monitoring for further unexpected finds.
C13	Establish a 'no-go zone' around the item commensurate with the size of the find providing a minimum 5m buffer around the find. Use appropriate protection measures to isolate and protect the site. Inform all site personnel that the 'no-go zone' has been established and works cannot continue in immediate proximity.
C14	In advance of any works undertake a risk assessment to determine appropriate health and safety controls and PPE. Install appropriate containment, stormwater/drainage and sediment controls to protect the site. Contaminated material will be stockpiled and stored on hardstand or lined areas and segregated from uncontaminated material to prevent cross-contamination. Provide any additional controls to ensure the site does not present an unacceptable health and safety hazard to personnel, the public and adjoining land use.
C15	Notify the EPA Environment Line 131 555 where there is environmental harm or a pollution event has occurred. The Environment Line is a one-stop pollution and environmental incident reporting service provided by Environment and Heritage Group and EPA. Undertake any subsequent incident reporting in accordance with Section 7 of the CEMP.
C16	If sufficient work space and if safe to do, relocate any plant, equipment and vehicles adequately ahead of the find site.
C17	Inspect, document and record the item including photographs and coordinates of the find site. Observe and record the following details of the unexpected contamination find: <ul style="list-style-type: none"> <li>&gt; Location of the potential contamination</li> <li>&gt; Visual appearance</li> <li>&gt; Odour (if any)</li> <li>&gt; Depth</li> <li>&gt; Surrounding material and works being undertaken at the time of discovering the material</li> </ul>
C18	Do not touch or disturb the item/ materials.
C19	At the direction of the AIE and or Jemena Representative, the LECH Manager is to obtain assistance from a suitably qualified and experienced contaminated land consultant in identifying the potential hazard to human health or environment. Undertake any sampling and laboratory analysis of materials that may be required in accordance with relevant guidelines. Support AIE and or Jemena to progress any additional assessment and notification to the EPA as determined in consultation with the contaminated land consultant..
C20	Undertake any temporary remediation or amended works as directed to ensure the site does not present an unacceptable health and safety hazard.
C21	Material not approved for backfill or surplus to project requirements will be classified in accordance with the NSW EPA Waste Classification requirements and handled and transported by a licenced transporter to a licenced facility for disposal. Refer also to the Waste Management Plan (WMP) (GAS-599-PA-EV-008) Disposal of materials will be recorded in the Disposals Register (WMP Appendix B). On site movement of materials will be recorded in the Materials Tracking Register (WMP Appendix C).
C22	Recommence works at sites subject to any site validation and approval by AIE and or Jemena Representative.
<b>C23</b>	<b>Asbestos</b> An unexpected asbestos find occurs when Asbestos Containing Materials (ACM), not associated with a known site of contamination is found on site. In the event of an unexpected asbestos find, the below steps are to be followed:
C24	Ensure the soil and potential asbestos remain damp with dust suppression or securely covered where water cannot be accessed.  If material is to be left over night, exposed area is to be securely covered with geofabric.
C25	If required and at the direction of the AIE and or Jemena representative arrange for testing of the suspected ACM and arrange for an occupational hygienist to undertake monitoring of the area as required.
C26	At the direction of AIE and or Jemena engage a licenced asbestos removalist to provide recommendations, treatments transport and disposal as required.
C27	A clearance certificate to be provided by an independent licenced asbestos assessor or competent person to confirm that the area safe and suitable for the re-commencement of works.
<b>C28</b>	<b>Acid Sulfate Soils</b> An unexpected ASS find may occur where specific physical characteristics such as staining and sulfurous odours associated with ASS are detected during excavations in ASS risk areas, particularly excavation of estuarine sediments within the Port. If suspected ASS the following steps to be followed:
C29	In consultation with the AIE and or Jemena Representative modify the work to avoid the area of ASS if practicable and safe to do so.

No	Action
C30	If the excavation of potential ASS cannot be avoided undertake in situ testing to confirm ASS status and manage in accordance with the Acid Sulfate Soils Management Plan (ASSMP) Refer to the Soil and Water Management Plan Appendix G
C31	Undertake all site management in accordance with the ASSMP.
C32	Any untreated material not approved for backfill or reuse requiring to be removed and disposed off-site will be classified in accordance with the NSW EPA Waste Classification requirements and handled and transported by a licenced transporter to a licenced facility for disposal.
<b>C33</b>	<b>RAP</b> Where the reporting of an unexpected find determines that remediation is required a Remediation Action Plan (RAP) will be prepared by a suitably qualified contaminated land consultant and be provided to the Project nominated site auditor for review.
C34	RAP actions will be implemented as directed by AIE and Jemena Representative
C35	Should contaminated material require offsite disposal refer to the Waste Management Plan (WMP) for guidance on management, handling, waste classification, disposal and tracking requirements. Disposal of materials will be recorded in the Disposals Register (WMP Appendix B). On site movement of materials will be recorded in the Materials Tracking Register (WMP Appendix C).
C36	Recommence works at sites subject of RAP once validation of contaminated land has been confirmed in accordance with any RAP.

## 5 MONITORING AND INSPECTIONS

The Nacap LECH Manager or delegate shall coordinate inspections and monitoring of works and actions to support the unexpected find and isolation and protection of the unexpected finds site(s).

Site inspections will be recorded (along with actions and issues observed) and actioned appropriately within agreed timeframes. Inspections will be recorded as part of Environmental Inspection Checklist.

Non-compliance and incident reporting will be implemented in accordance with Section 7 of the CEMP. Any stakeholder / landholder communications and or complaints will be managed as per Section 5.4 of the CEMP and notified to the Project Manager and appropriate corrective actions implemented including a review of work practices and protective measures to ensure no repeat occurrences.

## 6 RECORD KEEPING AND REPORTING

### 6.1 Record Keeping

The Project shall maintain a documentation and record system in support of the CEMP and this UFPC including Project HSE reporting requirements to enable review and auditing of environmental management systems and procedures.

The following records are expected to be generated in relation unexpected finds management and monitoring:

- > Visual monitoring and environmental inspection records
- > Landowner and Stakeholder discussion records
- > Induction, training and awareness records
- > Unexpected finds site and construction activity specific records and registers
- > Disturbance records
- > Disposals Register
- > Materials Tracking Register

- > Reporting of Environmental Incident, non-conformances and corrective actions
- > Audit reports, and
- > Complaints.

Records will include at a minimum:

- > Incident reports in relation to unexpected finds
- > Photographs
- > GIS data
- > Environmental Inspection Reports.
- > Landowner and Stakeholder discussion records

## 6.2 Reporting

Daily, Weekly, Monthly and Annual Reporting will include information on relevant unexpected finds data and commentary as generated in support of unexpected finds, incident and complaint management, regulatory and contractual requirements.



ATTACHMENT 1 UNEXPECTED FINDS PROCEDURE FLOWCHART

Figure 1 Unexpected Finds Procedure – Contamination Flowchart

