RICHARD CROOKES
CONSTRUCTIONS

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SYDNEY BIOMEDICAL ACCELERATOR
1330

CONSTRUCTION WASTE MANAGEMENT SUB-PLAN

12 May 2025

This plan has been approved for use by the following:

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REVISION REGISTER

REVISION DATE	REVISION DESCRIPTION	PMS INITIALS (ACCEPTANCE OF CHANGES)
04.06.25	Original issue	

PROJECT POSITION	NAME	SIGNATURE	REVISIONS			
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Add others:						

CONTENTS

1 CONDITION OF CONSENT

The following section outlines the compliance requirements of the Condition of Consent relating to this CWMSP. Should any development modifications prompt an update of these requirements, this section will be amended as needed and the revised CWMSP distributed as required.

TABLE 1: CONDITION B22 COMPLIANCE MATRIX

SSD-55388456: CONDITION B22 CONSTRUCTION WASTE MANANGEMENT SUB-PLAN	REFERENCE
The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following:	Note
(a) The recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use for materials to remain;	Section 5
(b) Information regarding the recycling and disposal locations; and	Section 3.3
(c) Confirmation of the contamination status of the development areas of the site based on the validation results.	Section 3.4

2 INTRODUCTION

This Construction Waste Management Plan Sub-Plan (CWMSP) forms part of the Construction Environmental Management Plan for the Sydney Biomedical Accelerator (SBA) Project. This Sub-Plan describes how Richard Crookes Constructions (RCC) will minimise and manage waste related environmental impacts during the delivery of the SBA Project.

2.1 PURPOSE OF THE PLAN

RCC recognises the importance of promoting building design and construction techniques which minimise waste and provides an efficient recycle procedure for all waste material.

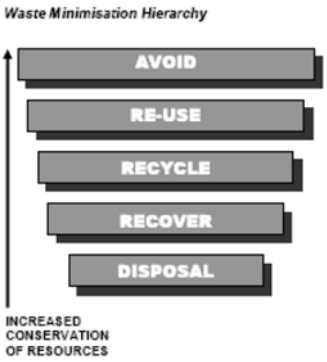
The purpose of this plan is to outline processes for:

- Objectives and Targets;
- Operational Controls;
- Recording, Monitoring Corrective Action; and,
- Reporting.

3 RCC OBJECTIVES AND TARGETS

RCC's overall objective is to achieve a minimum of (90%) for recycled waste (by weight) generated by the Project.

The Operational Controls implemented to achieve this include:

Operational Controls		Method of Recording
General	Identify any hazardous and toxic materials (e.g. asbestos) and comply with SafeWork NSW requirements. Develop project Waste Management Plan Aim to order required quantities only (initial waste avoidance) Communicate housekeeping and litter reduction rules with subcontractors during contract letting and via site induction.	Hazardous substance survey Waste records Induction
Waste Hierarchy	Implement the waste hierarchy – avoid, reuse, recycle, and lastly dispose to landfill	
Demolition Plan	Concrete, bricks, plasterboard, timber, tiles, PVC, metal, paper and cardboard, glass, appliances, carpet, vegetation, and soil to be considered for recycling (where appropriate). Asbestos (ACM) to be removed by a licenced contractor (up to 30 June 2007 >200m2, 1 July 2007 >50m3, from 1 Jan 2008 >10m2 of bonded asbestos) and managed in accordance with WHS Act & Regulation 2012 and EPA requirements. Lead paints and dusts will be removed using wet sanding and vacuum techniques (cleaners which comply with AS/NZS 3544 Industrial vacuum cleaners for particulates hazardous to health). Waste will be contained within sealed plastic bags for disposal. Clean up with a wet mop.	Monthly waste report Disposal dockets

Operational Controls		Method of Recording
Consider Recycling or Reprocessing	Where practicable: Timber for reuse or mulching Aluminium wall frames – recycle Plasterboard – recycled or used as soil improver Steel – recycle Toughened glass – reprocess Carpet and underlay – reprocess and mulch mats	Monthly waste report
Product Stewardship	Investigate returning waste to the manufacturer	Contract / Supply Agreements
Putrescible Waste	Putrescible waste is to be contained in bins and collected by a licenced contractor for disposal	Invoices
Contaminated Soils	Contaminated soils will be excavated and classified in accordance with EPA guidelines '*Waste Classification Guidelines, Part 1: Classifying waste*' (November 2014) https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste/waste-classification-guidelines	Remediation and Validation Report Waste classification certificates Clearance certificates Waste records Disposal records
Virgin Excavated Natural Materials (VENM)	VENM excavated from site with suitable compaction qualities will be beneficially reused on other construction sites whenever possible. Disposal to landfill will be the last option. No fill will be received on site that does not comply with EPA guidelines i.e. VENM, an appropriate resource recovery exemption and contamination limits appropriate to the development.	Test reports Waste records Disposal dockets
Monitoring	Bin(s) with heavy lids shall be provided for putrescible waste Daily inspections shall be carried out to ensure the worksite is litter free	Environmental Inspection Checklist

Operational Controls		Method of Recording
Reporting	Waste report to indicate weight of recycled materials (classified by waste type) and residual waste disposed of. Percentage of recycled materials to be recorded (target >90%)	Monthly reports
Non-Compliance	Generation of water pollution and/or air pollution from onsite waste storage Inappropriate/illegal offsite disposal of waste materials Hazardous material contamination of recoverable waste stream thereby requiring landfill disposal	Environmental Inspection Checklist (monitoring) Incident report, non-conformance report (NCR)
Emergency Response	No specific requirements associated with waste management. Scenarios such as spill, fires, explosions covered by the project emergency response plans.	Incident report

4 WASTE MANAGEMENT

4.1 WASTE CLASSIFICATION

All waste generated on site will be assessed, classified, and managed in accordance with the EPA's *'Waste Classification Guidelines Part 1: Classifying Waste'*, which requires waste material to be classified into the following waste classes as defined in Clause 49 of Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act):

- Special waste
- Liquid waste
- Hazardous waste
- Restricted solid waste
- General solid waste (putrescible)
- General solid waste (non-putrescible)

4.2 WASTE HANDLING AND STORAGE

During construction, the following measures will be implemented to minimise potential impacts associated with handling and storing waste onsite prior to collection and recycling/disposal.

- Spoil is to be stockpiled onsite in allocated areas with appropriate containment and segregation
- Liquid waste is to be stored in appropriate containers in bunded areas until transported offsite
- Special and/or hazardous waste will be segregated, contained, and stored separately in an appropriately bunded area
- Unexpected finds of contamination will be managed in accordance with the unexpected finds protocol documented within Appendix I of the Remediation Action Plan prepared by Douglas Partners (subject to amendment within updated RAP)

Waste management areas will be established during construction for the storage of waste prior to transportation offsite. Most construction waste will be stored in co-mingled bins for offsite processing to maximise resource recovery. Stockpiles and bins will be appropriately labelled, managed and monitored.

Handling and storage of construction waste will be managed via a combination of wheeled bins, 'skip' bins, and front lift bins for food.

Monitoring of the waste handling and storage strategies will be undertaken in accordance with Section 4.15 of the Construction Environmental Management Plan (CEMP).

4.3 WASTE TRANSPORT AND DISPOSAL

A reputable waste contractor will be engaged by RCC for supplying waste bins, transporting waste offsite, and processing waste for recycling and disposal of residual waste to landfill. All waste will be transferred to licensed facilities that can lawfully accept such waste.

Details pertaining to the intended recycling and disposal locations will be included within this section when the waste contractor is engaged.

Hazmat removal and disposal will be managed by RCC's civil subcontractor, Moits, who is suitably qualified. Hazmat will be disposed of as contaminated waste at EPA licensed facilities, with disposal records issued to RCC progressively throughout the works.

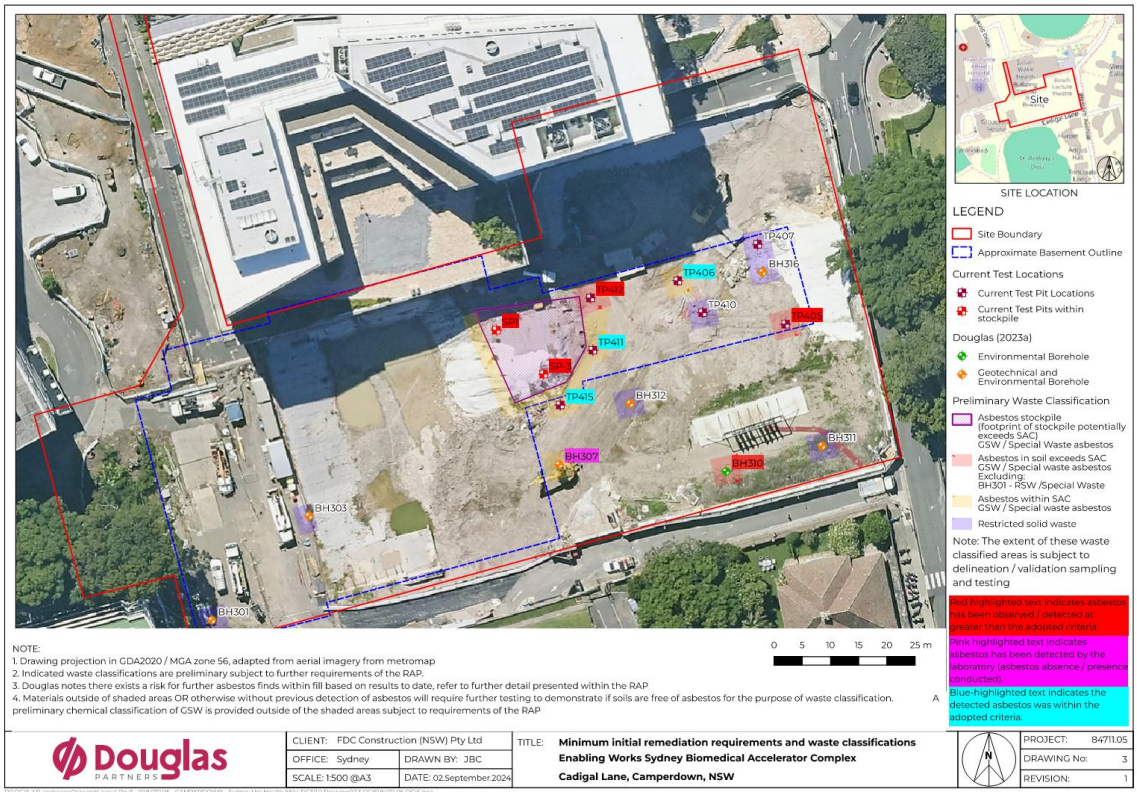
4.4 CONTAMINATION

In September 2024, Douglas Partners undertook a Supplementary Contamination Investigation (SCI) following demolition of existing buildings and preliminary earthworks at the SBA site, which was completed under a separate contract.

It is understood that Hazmat clearances were undertaken after demolition, however, these weren't available to Douglas Partners at the time of review. As such, it is considered that the risk of asbestos (particularly surficial) from the previous buildings may have impacted the fill across the site.

Analytical results from the soil samples reported no health base exceedances of the adopted site assessment criteria (SAC), and minor ecological exceedances of Benzo(a)pyrene, however, these are not considered to pose an unacceptable risk to terrestrial ecosystems. Asbestos was detected by the laboratory in the form of Asbestos Containing Material (ACM) at TP405 and TP412, and as friable asbestos / asbestos fines (PA/AF) at TP405, TP406, TP411, TP412 and TP415, however, all were within the adopted criteria. Test pit locations are identified within Figure 1 below.

FIGURE 1 – MINIMUM INITIAL REMEDIATION REQUIREMENTS AND WASTE CLASSIFICATIONS



Based on additional field observations consisting of a similar fill profile, it is considered that there is a latent risk of additional unidentified asbestos present throughout the fill, which may result from hazardous building materials in previous demolished structures, and otherwise due mixing of soils as part of preliminary earthworks.

Based on field observations and analytical results above, the following preliminary waste classifications are provided for the site:

- Fill at BH407 and 410 – special waste (asbestos) and restricted solid waste (non-putrescible). Noting, further assessment may consider applicability of the NSW EPA general immobilisation order 1995/05 given ash was noted in the fill at some locations, including TP407;
- Remaining fill at the site – special waste (asbestos) and general solid waste (non-putrescible); and
- Stockpile – special waste (asbestos) and general solid waste (non-putrescible)

Based on the results of the data gap investigation, it is considered that the site can be made suitable for the SBA development subject to implementation of the following recommendations:

- Updating of the Remediation Action Plan (RAP) to address the management options for the asbestos impacted soil. Noting, Douglas Partners has been engaged to prepare this update. Recommendations will be documented within the CWMS-P when available.
    - Regarding asbestos impacted subsurface fill:
        - Relocation to area beneath hardstand (or beneath new fill). If fill is retained, further validation sampling would be required to demonstrate no surficial asbestos is present. Relocation may also include management in an onsite containment cell, managed under a Long Term Environmental Management Plan (LTEMP);
        - Contaminated fill may be considered for offsite disposal if the above is unviable;
        - Further in-situ testing considered unlikely to refine the potential extent given the low concentration and sporadic detection to date
    - Regarding the asbestos impacted stockpile:
        - Onsite management (cap and contain) subject to revision of the RAP and implementation of a LTEMP;
        - Removal of the stockpile from site under an assigned waste classification

5 REPORTING AND COMPLIANCE

All waste disposals undertaken by licenced contractors will be tracked by the receipt of waste disposal records.

Waste dockets associated with the removal of contaminated waste are to be retained for quality assurance purposes. Where available, soil classification reports are also to be retained.

GREEN STAR

RCC's Sustainability Manager will be responsible for collecting monthly waste reports (Form 18.1) or utilising the waste subcontractor reporting format and issuing them to the Project Manager and Client Representative.

These reports will measure the weight of waste generated of material by classification, total weight of waste, percentage by weight recycled and percentage by weight to landfill.

The Waste Contractor and Waste Processing Facilities are required to verify their compliance with the *Green Star Construction and Demolition Waste Reporting Criteria* via the following:

- A **Compliance Verification Summary** that has been signed and dated by a suitably qualified auditor. A Compliance Verification Summary is valid for 12 months from the date of issue and must be current for the duration of time that the waste contractor is providing waste services and reports to a Green Star project; or
- A **Disclosure Statement** outlining to what extent the 'Reporting Criteria' has been implemented. This statement must also indicate the expected timeline for implementation of at least Part 1 of the Waste Contractors section of the reporting criteria.

6 ESTIMATED QUANTITIES

The Waste Management Plan – Construction chart (Form 18.2b) is an estimate of the core waste streams that will be removed from the Sydney Biomedical Accelerator Project. Each waste stream will be assessed against the Reuse & Recycling potential, with residual waste allocated as Disposal (to landfill).

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