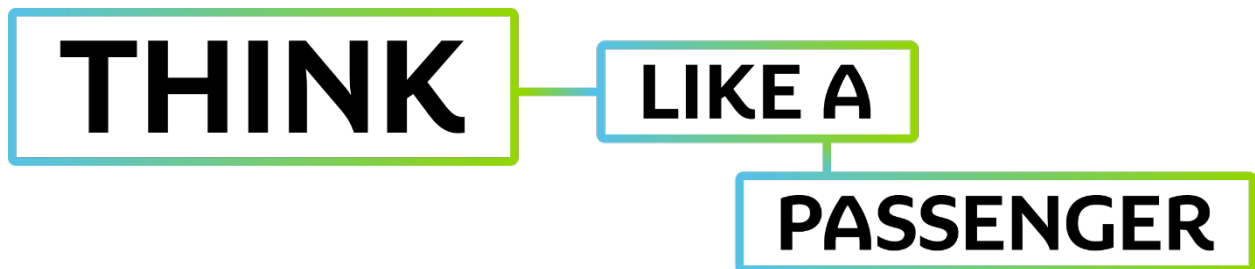
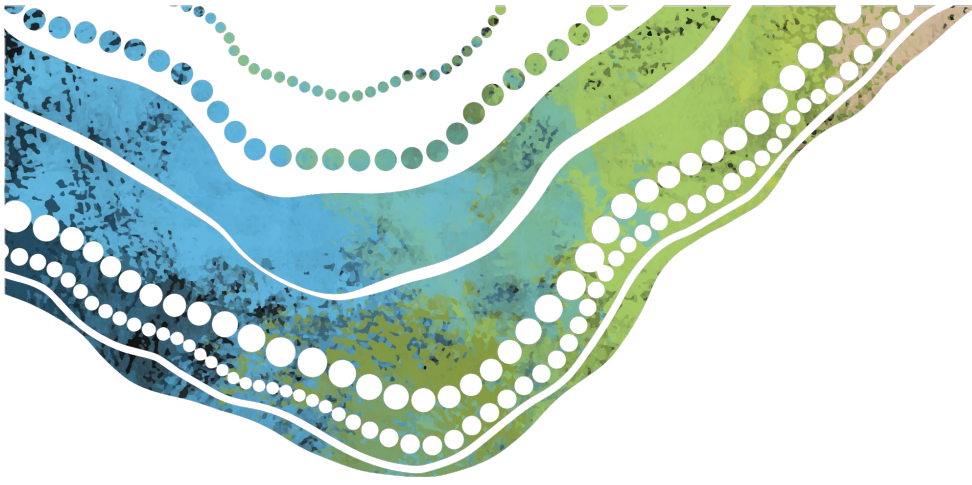


# Environmental Management Plan

**KEOLIS DOWNER NORTHERN  
BEACHES  
GSBC008\_CY3**





### **Acknowledgement of Country**

Keolis Downer Northern Beaches recognises the traditional custodians of the lands on which we work, the Garigal, Gayamaygal, Birrabirragal, Gamaragal, Borogegal and Gadigal peoples.

We acknowledge their spiritual and cultural bonds linking them to their lands.

We honour the presence of their ancestors who reside in the imagination of the land and whose irrepressible spirituality flows through all creation.

We further recognise their continued custodianship, wisdom and knowledge forever embedded in their lands and pay reverence to their Elders past, present and emerging



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## 1. Introduction

Keolis Downer Northern Beaches (KDNB) is committed to making a significant contribution to improving the environment through the efficient use of resources in the delivery of our bus services. Improving the environment is everyone's responsibility and all parties have a duty of care to themselves and others to act in ways that contribute to the continuous improvement of our environmental performance.

KDNB is committed to complying with environmental legislation which has been enacted at a local, state and federal level. More broadly, Keolis Downer focuses upon proactive management of the environment. Sustainability does not focus on compliance - it enhances the performance of the business in order that environmental values can be upheld, and environmental benefits realised.

KDNB operates the bus network in the Northern Beaches and Lower North Shore, providing people the freedom to move whenever and however they choose, through environmentally-friendly transportation services that connect people and communities.

## 2. Scope

This Environmental Management Plan (EMP) is applicable for Keolis Downer Northern Beaches employees, contractors and visitors on sites/depots and areas where company provides services. KDNB depots are:

- Brookvale Depot – 630-636 Pittwater Road Brookvale
- Mona Vale Depot – 58 Darley Street, Mona Vale
- North Sydney Depot – 359 Ernest Street, Neutral Bay

This EMP identifies, evaluates, controls and mitigates environmental impacts generated by KDNB to water, land, air and biodiversity.

## 3. Purpose

The objective of this EMP is to provide an overview of the potential impacts of our operation, and to demonstrate Keolis Downer's commitment to managing its significant environmental risks, namely energy, water and material use, waste generation, air quality impacts, impacts on heritage items, impacts on flora and fauna, noise and vibration, soil, surface water and groundwater contamination.

The purpose of this EMP is to describe the management, mitigation measures and opportunities which aim to protect the environment and sensitive receivers. This EMP provides an approach to sound environmental management practices and sustainable approach to a reliable bus network operation that contributes to a more resilient future.

This EMP is supported by an environmental risk register and the supporting policy will be made publicly available on the KDNB website.

This document is based on the general requirements of an environmental management plan consistent with the requirements under the *ISO 14001:2015 Environmental Management Systems*, the requirements under Greater Sydney Bus Contract 8 (GSBC8), statutory obligations related to environmental protection and TfNSW strategies:

- *Future Transport Strategy 2056* (Transport for NSW, 2018) outlines a vision and key strategic directions to produce and develop a world class, safe, efficient and reliable transport system. It acknowledges that the transport sector is playing a significant role to develop an environmentally sustainable community. It supports the NSW Government's aspirational target to achieve net-zero emissions by 2056 and has inspired our Zero emission vehicle fleet options.

- *Connecting to the future - Our 10-year blueprint* (Transport for NSW, 2018) challenges our day to day practices and identifies where to respond to heightened sustainability pressures

This EMP outlines significant environmental aspects across Keolis Downer's Northern Beaches operations. Specific objectives have been identified against each aspect, and our mitigation approach clearly defines how measures will be implemented and the allocation of responsibility resourcing.

#### 4. Environment Policy

KDNB will operate in accordance with the Environment Policy and within the Business Management System (BMS) which is integrated to include all areas of health, safety, quality and environment. The BMS drives continuous improvement and sets leading targets focussing on customer satisfaction, safety, and pollution prevention across every aspect of our operations.

The Environment Policy is authorised by the Managing Director demonstrating personal commitment and intent as the most senior person in the organisation.

The Environment Policy documents the commitment to:

- Zero Harm and the goal for environmental management and sustainability to be an integral part of the business;
- ensure, so far as is reasonably practicable, that environmental risks created by our operations are pro-actively managed;
- achieving, maintaining, and where reasonably practicable to do so, continuously improving environmental management performance; and
- providing adequate resources to ensure the effective implementation of the Policy, its requirements and its objectives.

The policy is implemented through the development and deployment of our BMS, environmental improvement initiatives and action plans.

The Environment Policy will be reviewed annually, or when required, to reflect changes in objectives or specific senior management commitments. All revisions to the policy will be approved by the Managing Director following consultation with employees via the Business Management System Consultative Committee (BMSCC).

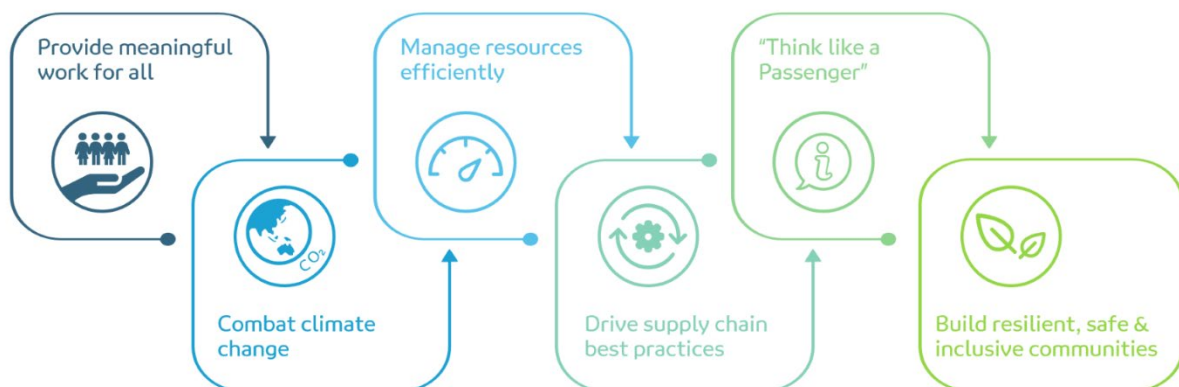
The Environment Policy will be made widely available, on BMS SharePoint and displayed throughout the depots on SQE Notice Boards in offices and depots. The Environment Policy is included in inductions, employee handbooks, team briefs, extending this to suppliers, contractors and other external organisations. All new recruits will be provided with a copy of the Environment Policy during their Induction Program.

## 5. Keolis Downer Sustainability Principles

The Keolis Downer values 'We Care, We Commit, We Imagine', define who we are and how we behave, they drive us as a public transport provider. We place a strong emphasis on the development of a common culture and have also been working for many years to improve our environmental performance.

Keolis Downer has developed a Group level Sustainability Strategic Plan which includes themes involving our passengers, our employees, our subcontractors and suppliers, our communities and our environment. The Sustainability Strategic Plan focuses on the areas identified by our six Sustainability Principles as depicted below.

### Keolis Downer's Sustainability Principles



### 5.1. Keolis Downer Sustainability Working Group

Keolis Downer has established a Sustainability Working Group to develop and implement the group-level Sustainability Strategy including defining group level commitments. Each of the Keolis Downer businesses nationally is represented to ensure collaboration, opportunities for shared learnings and development of consistent initiatives to achieve our group level plan.

The Working Group aims to:

- Develop a group level Sustainability strategic plan to recommend to the Executive team and Board for adoption;
- Identify opportunities, key improvement areas and initiatives to achieve our Sustainability objectives and further engage our businesses and stakeholders to achieve our strategic goals;
- Assist in developing and prioritising strategy objectives and actions across our business; and
- Support and promote sustainability across our businesses.

The responsibility for ensuring sustainability outcomes extends well beyond the Sustainability Working Group to other business work streams, functional groups, the Executive and our contractors. Whether it is ownership of targets, or promotion of benefits and outcomes, sustainability is integrated across the entire business and is a shared responsibility.

The Sustainability Working Group will provide regular updates of progress against the plan to the Keolis Downer CEO and Executive Team through the Group SQE Manager.

## 6. Responsibilities

Role	Key responsibilities
<b>Managing Director</b>	<ul style="list-style-type: none"> <li>▪ Ensure effective implementation of the Environmental Policy and Environmental Management Plan;</li> <li>▪ Promote environmental management within the business; and</li> <li>▪ Undertake any consultation with stakeholders regarding environmental issues.</li> </ul>
<b>Safety and Security Manager</b>	<ul style="list-style-type: none"> <li>▪ Ensure currency of the EMP throughout the operational term;</li> <li>▪ Environment and Sustainability leadership and representation; and</li> <li>▪ Liaise with external parties, including regulatory bodies and Transport for NSW.</li> <li>▪ Ensuring provision of adequate resources to achieve environmental objectives.</li> </ul>
<b>SQE Advisors</b>	<ul style="list-style-type: none"> <li>▪ Ensuring environmental aspects and impacts are monitored and implemented based on this EMP;</li> <li>▪ Updating the EMP throughout the operational term;</li> <li>▪ Reviewing all reported incidents and assist Supervisors in determining corrective actions required;</li> <li>▪ Reporting on monthly KPI;</li> <li>▪ Ensuring compliance with environmental legislative requirements;</li> <li>▪ Identifying environmental issues as they arise and proposing solutions;</li> <li>▪ Ensuring material environmental risks, issues, obligations and commitments are identified and effectively communicated to relevant staff;</li> <li>▪ Assisting the Head of Customer Experience to resolve environment-related complaints;</li> <li>▪ Internal and external environmental reporting; and</li> <li>▪ Conduct and document inspections and audits to ensure compliance with this EMP including:                             <ul style="list-style-type: none"> <li>– Appropriate management practices are being followed; and</li> <li>– Correct documentation is in place.</li> </ul> </li> </ul>
<b>Managers</b>	<ul style="list-style-type: none"> <li>▪ Providing sufficient resources at each site to implement the requirements of the EMP;</li> <li>▪ Ensure additional significant aspects and their impact relevant to their site are identified and controlled in a site-specific plan, if required; and</li> <li>▪ Conducting investigations of any non-conformances against these plans and ensure corrective action is implemented.</li> </ul>
<b>Supervisors</b>	<ul style="list-style-type: none"> <li>▪ Undertaking inspections of work areas to ensure controls identified in this plan, and any site-specific plan, are in place;</li> <li>▪ Report any non-conformances against these plans to the SQE Advisor, and ensure any immediate actions are implemented to prevent further harm or nuisance;</li> <li>▪ Ensure the requirements of these plans are understood and implemented by staff in their area; and</li> <li>▪ Monitor corrective actions implemented to ensure they are effective.</li> </ul>
<b>Workers</b>	<ul style="list-style-type: none"> <li>▪ Report incidents immediately to their supervisor, and implement immediate actions to prevent further harm or nuisance; and</li> <li>▪ Implement the requirements defined in these plans.</li> </ul>

## 7. Targets and Objectives

In consideration of the Environment Policy, contractual requirements, and any identified hazards and/or risks for the project, Keolis Downer has developed a set of objectives and targets that are applicable to KDNB.



These overarching objectives and targets are managed to ensure that all identified, as well as potential environmental impacts that could reasonably be expected to occur during operations, fall within acceptable and agreed limits. This is achieved through pro-active environmental management planning prior to carrying out particular activities.

Focus Area	Objective	Target
Legal Compliance	<ul style="list-style-type: none"> <li>Compliance with all legal requirements.</li> <li>Operate KDNB in accordance with environmental approvals, orders and notices, as applicable.</li> </ul>	<ul style="list-style-type: none"> <li>No regulatory infringements, including Provisional Improvement Notices and prosecutions.</li> <li>100% compliance with statutory approvals.</li> </ul>
Monitoring	<ul style="list-style-type: none"> <li>Complete internal environmental audits in accordance with the pre-planned audit schedule.</li> </ul>	<ul style="list-style-type: none"> <li>Complete 100% of scheduled environmental audits.</li> </ul>
Reporting	<ul style="list-style-type: none"> <li>Promote a positive reporting culture. Ensure all environmental observations, hazards and near misses and incidents are captured and reported on. Ensure actions are closed out by the nominated due dates.</li> </ul>	<ul style="list-style-type: none"> <li>0 actions arising from incident overdue &gt;30 days.</li> </ul>
Planning	<ul style="list-style-type: none"> <li>Ensure that workers are provided with regular and up-to-date information on environmental aspects for the duration of the operations.</li> </ul>	<ul style="list-style-type: none"> <li>Review the content of the Environmental Management Plan annually to maintain the currency of information provided to workers and others.</li> </ul>
Risk Management	<ul style="list-style-type: none"> <li>Ensure that workers are familiar with hazards and risks associated with the execution of the activities being performed as part of the operations.</li> </ul>	<ul style="list-style-type: none"> <li>The Risk Register, controls, and treatment plans are regularly reviewed and communicated in accordance with this EMP.</li> </ul>
Consultation	<ul style="list-style-type: none"> <li>Ensure that workers are regularly consulted on matters that affect the environment.</li> </ul>	<ul style="list-style-type: none"> <li>Conduct BMS Consultative Committee meetings quarterly.</li> </ul>
Training	<ul style="list-style-type: none"> <li>Ensure workers are provided with training to enable work practices to be undertaken that are safe and minimise risk to the environment</li> </ul>	<ul style="list-style-type: none"> <li>All workers undertake, as a minimum, Zero Harm induction training.</li> <li>Role specific environmental management training (e.g. spill training etc.).</li> </ul>

## 8. Significant Environmental Aspects

The following items have generally been identified as the significant environmental aspects across Keolis Downer's operations:

- Air and Water Quality;
- Waste Management;
- Hazardous Substances and Materials;
- Legacy hazardous substances and contaminated land and groundwater;
- Flora and Fauna; and
- Noise.

Where sites or locations have been identified to have other unique aspects that will be managed specifically by that location, that has been identified.

Minimising resource usage to manage availability and carbon footprint, has been addressed as part of the Sustainability Management Plan.

The following sections describe the issues and management of the environmental aspects for KDNB.

## 8.1. Air and Water Quality

Recognising that fuel management requirements have a significant role in minimising environmental impact, air emission management is addressed in this EMP.

The purpose of this section is to provide guidelines for the emissions to air and water when undertaking operations. The primary sources of emissions for operations include fuel consumption and use of water for washing of buses.

While other resources such as materials used for consumables or manufacture of assets are largely beyond the control of the business, recyclable or reusable materials will be considered in the purchasing process. This is addressed as part of the Sustainability Management Plan.

### 8.1.1. Environmental aspect and potential impacts

- fuel consumption from bus operations generating emissions to air; and
- surface water run-off spreading potential contaminants and causing erosion and sedimentation.

Potential impacts:

- excessive emissions to atmosphere from vehicles;
- emissions worsened as a result of older or poorly maintained vehicles; and
- degradation of downstream water ways and their ecosystems.

### 8.1.2. Mitigation approach

The following mitigation measures will aim to minimise the potential impact to air quality as a result of bus operations in KDNB.

Aspect	Measure	Responsibility
Consumption (In managing fuel consumption air emissions will be reduced)	<ul style="list-style-type: none"> <li>▪ Shut down equipment and vehicles when not in use.</li> <li>▪ Maintain speed limits and drive to optimum conditions.</li> <li>▪ Staff and Subcontractor induction includes minimisation techniques in regard to use of fuel.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Drivers/ Supervisor</li> <li>▪ Drivers</li> <li>▪ Drivers/ Training</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Installation of a telematics system on the bus fleet to reduce fuel consumption and improve safety and driver behaviour.</li> <li>▪ Regular maintenance will be carried out on all vehicles to ensure they are running efficiently.</li> <li>▪ Establish KPI for fuel usage (litres per 100 kilometres)</li> <li>▪ Record fuel usage figures, monitor, and measure against KPI</li> <li>▪ Purchase fuel efficient equipment and vehicles</li> <li>▪ Bus Replacement strategy</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> <li>▪ Operations</li> <li>▪ General Manager</li> </ul>
Dust	<ul style="list-style-type: none"> <li>▪ Vehicles are to drive and park on sealed surfaces only.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Drivers</li> <li>▪ Workers</li> </ul>
Water	<ul style="list-style-type: none"> <li>▪ Bins stored on site will be covered at all times to prevent water infiltration and seepage.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> <li>▪ Operations</li> <li>▪ Supervisors</li> </ul>

- Avoid unnecessary ground disturbances - vehicles are to drive and park on sealed surfaces only.
- Vehicles, machinery or equipment are only to be washed in the bus chassis wash bay areas on the bus depot site which have suitable runoff collection sumps and oil/water separators.
- Where installed, the onsite water treatment system (which separates oil and water and discharges waste) must be operated in accordance with the relevant specifications and the Trade Waste Agreement.

### 8.1.3. Key Performance Criteria

Description	Responsibility	Deliverable	Target
Bus Fuel consumption figures monitored weekly to achieve optimum conditions (litres/km)	<ul style="list-style-type: none"> <li>▪ Workshop</li> <li>▪ Operations</li> </ul>	Fuel consumption records	Establish KPI for fuel usage (litres per 100 kilometres)
Drivers to drive to optimum conditions to minimise fuel consumption	<ul style="list-style-type: none"> <li>▪ Operations</li> </ul>	Fuel consumption records	2% Reduction
Water consumption figures to be monitored monthly	<ul style="list-style-type: none"> <li>▪ Administration</li> </ul>	Water usage records	2% Reduction
Depot electricity consumption figures to be monitored monthly	<ul style="list-style-type: none"> <li>▪ Administration</li> </ul>	Electricity usage records	2% Reduction
Total hydrocarbon usage monitored	<ul style="list-style-type: none"> <li>▪ Workshop</li> </ul>	Consumption records	2% Reduction

## 8.2. Waste Management

The purpose of this section is to provide guidelines on how to manage, minimise and dispose of waste from operations.

Waste generated includes paper, general office wastes, plastic, glass, material off cuts, oils, sewage, and other chemicals. Solid and liquid wastes generated on site are to be disposed of in the readily identifiable waste receptacles provided. The removal of all wastes shall be coordinated by the Regional Fleet Officer with approved waste contractors.

### 8.2.1. Environmental aspect and potential impacts

- Generation and disposal of solid waste including scrap metal, general office waste, packaging, and other workshop waste;
- recovery of recyclable material where possible; and
- generation and disposal of regulated wastes including waste oil, oil filters and oily rags.

Potential impacts:

- generation of consumable wastes burdening landfills;
- generation of hydrocarbon impacted wastes (e.g. oily rags, oily parts, waste oil and oily containers) potentially contaminating land and waters;

- community complaints from improper disposal practices, in particular litter; and
- legal non-compliance for disposal of general and regulated wastes resulting in harm to the environment and/or or infringement action.

## 8.2.2. Mitigation approach

These measures consider the waste management hierarchy in order of most to least preferred; avoid, reduce, reuse, recycle, recover, treat, dispose. Further measures and initiatives established to reduce and divert waste from landfill is further outlined in the Sustainability Management Plan. The following mitigation measures aim to minimise the potential impact on the environment and community, of waste generated by bus operations in KDNB.

Aspect	Measure	Responsibility
Waste segregation	<ul style="list-style-type: none"> <li>▪ All waste streams are to be identified, categorised and segregated into the following:                             <ul style="list-style-type: none"> <li>– General Waste</li> <li>– Recycling Waste (including scrap metal)</li> <li>– Regulated Waste</li> </ul> </li> <li>▪ All waste quantities to be recorded</li> <li>▪ All bins or waste storage areas are to be labelled or sign posted to ensure the correct items are disposed of appropriately.</li> <li>▪ Staff and subcontractor induction to include waste management. Employees generating waste shall be trained in proper storage, transport, and disposal of general, regulated and recyclable wastes.</li> <li>▪ Refer to Sustainability Management Plan for further measures to identify, maximise and manage recyclable waste.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> <li>▪ Operations</li> <li>▪ Supervisors</li> </ul>
Oil waste	<ul style="list-style-type: none"> <li>▪ Waste oil to be contained in labelled containers in storage areas</li> <li>▪ Oil drums/containers to be stored in labelled storage area and stored closed</li> <li>▪ Oil filters to be stored on a bunded pallet in a contained area</li> <li>▪ Oily rags to be stored in a labelled oily rag bin</li> <li>▪ Oil, oily rags, oil filters and oily component of oily water to be disposed of through licensed oil recycler</li> <li>▪ Oil drums/containers to be disposed of to licensed drum recycler or supplier</li> <li>▪ Separate oily liquid wastes and discharge the non-oily component to sewer.</li> <li>▪ Absorbent material used to clean up oil to be stored in the supplied disposal bags and disposed of through oil recycler.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> <li>▪ Operations</li> <li>▪ Supervisors</li> </ul>
Vehicle batteries	<ul style="list-style-type: none"> <li>▪ Batteries to be stored on a bunded pallet in a contained area</li> <li>▪ Batteries to be disposed to a licensed facility</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> <li>▪ Operations</li> <li>▪ Supervisors</li> </ul>
Liquid waste	<ul style="list-style-type: none"> <li>▪ All liquid waste is to be stored in a bunded area or on bunded pallets as per the Hazardous Substances section below.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> <li>▪ Operations</li> <li>▪ Supervisors</li> </ul>
Disposal of regulated waste	<ul style="list-style-type: none"> <li>▪ All regulated/controlled/hazardous wastes such as oil, spent oil filters, oily rags and spent oil absorbent will be tracked.</li> <li>▪ Correct waste tracking forms to be obtained and used.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> <li>▪ Operations</li> <li>▪ Supervisors</li> </ul>
Transport and disposal of waste	<ul style="list-style-type: none"> <li>▪ Waste tracking will be carried out by obtaining the invoice from the disposal contractor which will highlight</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> <li>▪ Operations</li> </ul>

	<ul style="list-style-type: none"> <li>when the waste was picked up and where it was taken.</li> <li>Only licensed contractors for transport, recycling and disposal are to be used. Licensed disposal facilities must be confirmed from the contractors.</li> <li>Copies of the licences for waste transporters, disposers and recyclers will be kept on site and kept up to date.</li> </ul>	<ul style="list-style-type: none"> <li>Supervisors</li> </ul>
Reduction of waste	<ul style="list-style-type: none"> <li>All operations will be planned and carried out in a manner that reduces the generation of waste and ensures it is transported and disposed of appropriately.</li> <li>All quantities of waste will be recorded to identify better waste minimisation strategies.</li> <li>Refer to the Sustainability Management Plan for further measures aimed at reducing waste and diverting from landfill.</li> </ul>	<ul style="list-style-type: none"> <li>Workshop</li> <li>Operations</li> <li>Supervisors</li> <li>SQE Advisor</li> </ul>

Note that all wastes going off site are to be collected by contractor and as such final destination of waste, particularly regulated waste will be in accordance with the contractors Policy and procedures.

### 8.2.3. Key Performance Criteria

Description	Responsibility	Deliverable	Target
Waste streams identified and quantities reported	<ul style="list-style-type: none"> <li>Workshop</li> <li>Operations</li> </ul>	Waste receipts / Register	100%
Where opportunity exists, reduce waste to landfill by maximising recycling and reducing cost, consult with contractor	<ul style="list-style-type: none"> <li>Workshop</li> <li>Operations</li> </ul>	Waste recycling receipts/register/Inspections	10%
Waste contained to site, no litter	<ul style="list-style-type: none"> <li>Supervisors</li> </ul>	Inspections	100%
Regulated waste tracked	<ul style="list-style-type: none"> <li>Workshop</li> </ul>	Waste receipts	100%

### 8.3. Hazardous Substances and Materials

The purpose of this section is to provide guidelines on delivery, storage, handling and use of chemicals, including hazardous substances. Diesel, maintenance lubricants, and wastes from maintenance at the depot sites will be the main sources of risk.

Please note that the relevant requirements relating to occupational health and safety in relation to hazardous materials and chemicals are addressed as part of the Safety Management System and not discussed here.

#### 8.3.1. Environmental aspect and potential impacts

- spills and leaks to ground or waterways from handling, use and storage of chemicals, fuel and lubricants;
- maintenance or other works to the depots; and
- escape of deteriorating lead-based paint from external surfaces due to general wear.

Potential impacts:

- soil contamination from spills and leaks;
- water contamination from spills and leaks as a result of spill running offsite or if outdoors, being picked up through rainfall runoff;

- water and soil contamination from lead-based paint entering the environment;
- community complaints from misuse of chemicals; and
- legal non-compliance for storage of substances and contamination of land and/or water.

### 8.3.2. Mitigation approach

The measures below aim to set out measures to store, use and manage hazardous substances to minimise the potential risk of environmental harm. It considers the most common types of operational activities that use chemicals and hazardous substances. Waste management of regulated substances is addressed in the Waste Management section above.

Aspect	Management	Responsibility
<b>Chemical and Hazardous material storage</b>	<ul style="list-style-type: none"> <li>▪ Chemical Management including procurement must be undertaken in accordance with the Keolis Downer 08.05 Chemical Management Guidance</li> <li>▪ Fuels, Oils and Lubricants (FOLs) will be managed in accordance with the Australian Standard AS1940, "The Storage and Handling of Flammable Combustible Liquids".</li> <li>▪ All hazardous chemicals including FOLs are to be stored undercover in a bunded area or on bunded pallets.</li> <li>▪ A Hazardous Chemicals Register will be maintained at each site and stored within Chemwatch.</li> <li>▪ All chemical containers are to be appropriately labelled with its contents. Hazardous Chemicals containers are to be labelled as per the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).</li> <li>▪ Chemicals must not be decanted into or stored in any container other than a purpose made receptacle. i.e. drink bottles, cups etc.</li> <li>▪ The minimum possible amount of all hazardous substances will be stored on site.</li> <li>▪ Appropriate hazardous substance signage will be erected.</li> <li>▪ Only the minimal amounts of substances required for use shall be stored on-site.</li> <li>▪ Flammable aerosol (compressed gas propellant) packs and flammable liquids are to be stored in the flammable substances cabinets, with the correct placarding</li> <li>▪ Liquid degreasers and cleaners that are flammable or combustible are to be stored as per the manufacturer's recommendation and in accordance with AS1940.</li> <li>▪ Flammable and Combustible liquids shall be stored in accordance with AS 1940. Requirements include: <ul style="list-style-type: none"> <li>– bund capacity to be at least 100% of volume of largest package plus 25% of the storage capacity up to 10 000L, together with 10% of the storage capacity between 10 000L and 100 000L</li> <li>– distance between tank and bund</li> <li>– separation distances between other chemicals.</li> </ul> </li> <li>▪ Licensed transporters will be used for the delivery of larger quantities of chemicals.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> </ul>
<b>Procurement of Hazardous materials</b>	<ul style="list-style-type: none"> <li>▪ Prior to procurement, undertake Hazardous Chemical Risk Assessment utilising the Keolis Downer form 08.01 Hazardous Chemical Risk Assessment to identify and document potential physical or chemical reactions when using, handling or storing hazardous substances in workplaces, or in relation to any KDNB activities.</li> <li>▪ When the chemical arrives on site, an Emergency Response Plan identifies responses to specific emergencies including those for chemical use: <ul style="list-style-type: none"> <li>– Provide a copy of the site emergency response plan to the primary local emergency services organisation if the quantity</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> </ul>

# ENVIRONMENTAL MANAGEMENT PLAN

	<p>of a class of hazardous chemical at the site exceeds the manifest quantity.</p> <ul style="list-style-type: none"> <li>– Provide fire protection equipment, firefighting equipment and emergency and safety equipment.</li> <li>– Provide a spill containment system for hazardous chemicals if necessary.</li> <li>– Control ignition sources and accumulation of flammable and combustible substances.</li> </ul>	
<b>Spill response</b>	<ul style="list-style-type: none"> <li>▪ Spill kits shall be available in the workshop and at refuelling bays, near FOL storage areas, and in-service vehicles.</li> <li>▪ Ensure all staff and subcontractors are trained in the use of spill kits.</li> <li>▪ Employ spill kits immediately upon the event of a leak or a spill to prevent travel offsite.</li> <li>▪ In the event that a spill or leak has the potential to or has travelled off site, contact the SQE Advisor immediately.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> <li>▪ Supervisor</li> </ul>
<b>Inspections</b>	<ul style="list-style-type: none"> <li>▪ Monthly inspections of workshop, fuel and oil storage areas to monitor storage and handling practices.</li> <li>▪ Close out of corrective actions from inspections within one week.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Supervisor</li> </ul>
<b>Information management</b>	<ul style="list-style-type: none"> <li>▪ Education and training for all personnel on hazardous substance handling and usage, including spill response. Training records to be maintained.</li> <li>▪ SDS for all hazardous chemicals will be available and accessible to employees and must be current within 5 years of issue.</li> <li>▪ SDS and Hazardous Chemical Risk Assessment must be stored with the substance.</li> <li>▪ An inventory of hazardous chemicals kept will be maintained.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Manager</li> <li>▪ Supervisors</li> <li>▪ SQE Advisor</li> </ul>
<b>Handling hazardous liquids</b>	<ul style="list-style-type: none"> <li>▪ Hazardous substances including liquid wastes will not be handled, used or stored near stormwater drains.</li> <li>▪ Hazardous substances including liquid wastes must never be disposed of into stormwater drains.</li> <li>▪ All stormwater drains on-site must be labelled/identified.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workers</li> <li>▪ Workers</li> <li>▪ Managers</li> </ul>
<b>Maintenance works</b>	<ul style="list-style-type: none"> <li>▪ Maintenance will be carried out in a manner that minimises oil and lubricant spillage. Maintenance will be carried out on a designated hardstand or in an undercover workshop. Containment spill trays will be used where possible.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> </ul>
<b>Vehicle use</b>	<ul style="list-style-type: none"> <li>▪ Pre-start inspections will be used to check for spills and leaks. Significant leaks must be reported to a Supervisor immediately.</li> <li>▪ Where possible vehicles will not be parked near stormwater drains or near waterways to minimise the potential for spills or leaks entering the environment.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Drivers</li> </ul>
<b>Plant and Equipment</b>	<ul style="list-style-type: none"> <li>▪ Disused plant and equipment will be drained of oils and other fluids that could leak to the ground or shall be stored in a bunded area.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workshop</li> </ul>
<b>Refuelling</b>	<ul style="list-style-type: none"> <li>▪ Vehicles and plant will be refuelled at the refuelling bays or approved service stations, where possible.</li> <li>▪ Dispenser nozzles must be automatic click off type to prevent overfilling.</li> <li>▪ Small items of plant will be refuelled away from drains.</li> <li>▪ All refuelling areas are to be inspected daily.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Drivers</li> <li>▪ Workshop</li> <li>▪ Workshop</li> <li>▪ Workshop</li> </ul>
<b>Spill management</b>	<ul style="list-style-type: none"> <li>▪ All spills and leaks must be reported to the area Supervisor.</li> <li>▪ Spills and leaks to ground must be treated with granular absorbent or absorbent pads.</li> <li>▪ Large spills are to be contained using hydrocarbon booms.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workers</li> <li>▪ Workers</li> <li>▪ Workers</li> <li>▪ SQE Advisors</li> </ul>

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	<ul style="list-style-type: none"> <li>Any contaminated soil will be assessed on a case-by-case basis for treatment or disposal.</li> <li>All contaminated spill clean-up waste must be placed in the designated yellow bags or bins and then disposed of by the regulated waste contractor.</li> </ul>	Supervisors
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### 8.3.3. Key Performance Criteria

Description	Responsibility	Deliverable	Target
Monthly inspections of workshop, fuel and oil storage areas to monitor storage and handling practices	Supervisor	Inspection sheets	Monthly
Close out of corrective actions from inspections within one week.	Supervisor	Follow-up inspection MyOSH records	100%
Education and training for all personnel on hazardous substance handling and usage, including spill response	Managers	Training records	100%

### 8.4. Legacy Hazardous Materials and Contaminated Land

#### *Hazardous Building materials*

The following potentially hazardous materials have been identified as part of a Hazardous Building Materials Survey (HIBBS, 2020):

Table 1: Hazardous Building materials in each depot

Material	Brookvale Depot	Mona Vale Depot	North Depot	Sydney
<b>Lead based paint</b>	Lead based paint deteriorating on external window frames.	Lead based paint present however no deteriorating paints identified.	Lead based paint present however no deteriorating paints identified.	
<b>Non-friable asbestos</b>	Non-friable asbestos containing materials in the form of:  Asbestos cement conduits  Asbestos cement trough  Corrugated asbestos cement sheet  Flat asbestos cement sheet  Presumed asbestos electrical components	Non-friable asbestos containing materials in the form of:  An asbestos bituminous membrane  Flat asbestos cement sheet  An electrical backing board that may contain asbestos	Nil	
<b>Friable Asbestos</b>	Nil	Friable asbestos is likely to be housed in the closed system of the:  Walk-in safe  Small safe	Friable asbestos is likely to be housed in:  Small safes  Safe	



Walk-in safe

The asbestos containing materials were generally assessed to be in a stable condition and therefore are unlikely to present a potential risk to the environment under regular operations. Should any works be required to the depot, including minor or major renovations, appropriate environmental controls should be considered for those works.

However, some lead-based paint at the Brookvale depot was identified to be potentially posing a risk to the environment and is therefore discussed further below.

### *Contaminated Land – Brookvale and North Sydney depots*

TfNSW has undertaken previous excavation and removal of a five-kilolitre underground storage tank (UST) at the Brookvale Depot (E3 Consult, 2010) and decommissioned two 55,000 litre tanks by in-situ abandonment by foam filling at the North Sydney Depot (ENRS, 2016). Post decommissioning and removal sampling and analysis indicate that the presence of chemicals of potential concern are all less than the relevant adopted soil criteria and therefore the site is suitable for ongoing commercial and industrial use and ongoing risk of harm to the environment as a result of contaminants leaving the site is unlikely. TfNSW retain the obligation to manage legacy contamination on the site.

The abandoned USTs and potential contaminated land discussed above must be considered in any statutory approval, environmental assessment or activity specific management plan should any works be proposed. Measures associated with such works have not been included here as they are not considered part of standard operations.

### *Contaminated Land and Groundwater – Mona Vale Depot*

In 2012, at the Mona Vale Depot, a contaminated site assessment identified soil and groundwater impacted with Total Recoverable Hydrocarbons (TRH) and Polycyclic Aromatic Hydrocarbons (PAH) above adopted site criteria for commercial and industrial land use. It was concluded that the results were indicative of the presence of phase separated hydrocarbons (PSH) potentially from a diesel spill sump pit within the sites refuelling area. Notification was subsequently submitted to the EPA. Further analysis identified that contamination was limited to groundwater and sandy soils immediately above the groundwater table. Remediation works have been undertaken in accordance with a Remediation Action Plan, Voluntary Management Plan (VMP) and VMP Communication Plan, which have been updated and evolved over time. Actions have generally included:

- removal of the diesel spill sump pit;
- removal of the underground petroleum storage system (UPSS);
- decommissioning of all USTs and associated underground fuel distribution infrastructure;
- installation of a permanent active onsite groundwater PSH skimmer system; and
- on-going groundwater monitoring.

In accordance with the Mona Vale Bus Depot Environmental Management Plan (WSP, 2020), the residual contamination on the site and surrounds likely included:

- hydrocarbons, and in particular a PSH plume; and
- inorganic dissolved heavy metals, and in particular arsenic (the source is uncertain and unlikely related to bus depot activities).

TfNSW is responsible for undertaking all relevant remediation works in accordance with relevant plans, notices and statutory requirements at the Mona Vale Depot, including the Mona Vale Bus Depot Environmental Management Plan (WSP, 2020). TfNSW will communicate with Keolis Downer in relation to these works as they may affect KDNB operations, in particular in relation to timing of any ongoing works, environmental management of site activities and site access. Given that remediation activities

will be undertaken by TfNSW and not part of the operations covered by this plan, this plan does not include measures specific to those activities.

The Mona Vale Bus Depot Environmental Management Plan (WSP, 2020), has been developed to:

- outline the presence of known impacted material remaining on the site and surrounds;
- provide a framework for ongoing environmental management of the site and immediate surrounds;
- document specific management requirements for any future subsurface works at the site; and
- provide recommendations for those responsible for surrounding properties or nearby service easements.

It applies to those with responsibility for management and upkeep of the Mona Vale Bus Depot, including Keolis Downer as operator of KDNB.

The contaminated land, remediation and residual statutory requirements for the Mona Vale Depot site must be considered further in any statutory approval, environmental assessment or activity specific management plan should any works be proposed. Measures associated with such works have not been included here as they are not considered part of standard operations.

Please note that the relevant requirements relating to occupational health and safety in relation to hazardous materials and contaminated land are addressed as part of the Safety Management System and not discussed here.

#### 8.4.1. Environmental Aspect and potential impacts

The Mona Vale Bus Depot Environmental Management Plan (WSP, 2020) has identified the following risks relating to the contamination sources at the Mona Vale Depot:

- PSH is unlikely to be intercepted during typical activities given its depth
- direct contact could occur during construction or maintenance of the depot and its surrounds;
- vapour risk is acceptably low in the context of the commercial/industrial land use;
- the plume is unlikely to migrate through sediments to more distant sensitive receptors; and
- the risks relating to the arsenic plume are uncertain as the extent of the plume is unknown.

No excavation is anticipated as part of typical operational activities and as such no further risks have been identified.

#### 8.4.2. Mitigation Approach

Aspect	Management	Responsibility
<b>Existing Hazardous Building Materials</b>	<ul style="list-style-type: none"> <li>▪ Recommendations in the three Hazardous Building Materials Surveys (HIBBS, 2020) should be undertaken accordingly.</li> <li>▪ Identified asbestos containing materials in each of the depots should be inspected regularly to ensure that any deterioration or damage is detected early.</li> <li>▪ Develop a Hazardous Building Materials register to document each item of note, inspections and closing of actions required.</li> <li>▪ Ensure historical assessments and records are maintained in a centralised location for ease of access as required.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Manager</li> </ul>
<b>Contaminated land</b>	<ul style="list-style-type: none"> <li>▪ Should any change in site conditions at any of the depots occur such as siting of shiny ooze-like liquid or strong or unusual odour, the area should be isolated and further advice sought.</li> <li>▪ All operational activities, maintenance works, potential renovation or ground disturbance works must be strictly</li> </ul>	<ul style="list-style-type: none"> <li>▪ Workers</li> <li>▪ Supervisors</li> <li>▪ Manager</li> </ul>

	<p>conducted in accordance with the Mona Vale Environment Management Plan.</p> <ul style="list-style-type: none"> <li>▪ The Mona Vale Environment Management Plan must be provided to all subcontractors undertaking works on the site.</li> <li>▪ Implement and communicate improvements and amendments of the Mona Vale Environment Management Plan as advised by TfNSW.</li> <li>▪ Ensure all staff and subcontractors are inducted on the presence and requirements of the Mona Vale Environment Management Plan.</li> </ul>	
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### 8.4.3. Key Performance Criteria

Description	Responsibility	Deliverable	Target
Zero incidents of hazardous substance spills that are reportable to EPA NSW (including stormwater pollution)	<ul style="list-style-type: none"> <li>▪ SQE Advisor</li> </ul>	MyOSH incident reporting records	Zero
Zero incidents regarding hazardous building materials	<ul style="list-style-type: none"> <li>▪ Manager</li> <li>▪ SQE Advisor</li> </ul>	MyOSH incident reporting records	Zero

### 8.5. Flora and fauna

Given the sites of operation are predominantly main and local roads and bus depots with a predominantly sealed surface, the occurrence of flora and fauna is minimal. There are occasional small, landscaped areas some of which include large trees in proximity to main office buildings and surrounding roads at each depot. Mature trees and landscaped areas are also likely to occur on and adjacent to roads along the network routes. Additionally, none of the sites are located in close proximity of natural reserves or national parks.

#### 8.5.1. Environmental Aspect and potential impacts

- Incidental strike to tree or animal during standard operations and maintenance.

Potential impacts:

- Death or harm caused by incidental strike.

#### 8.5.2. Mitigation Approach

Aspect	Management	Responsibility
<b>Flora strike or impact</b>	<ul style="list-style-type: none"> <li>▪ Vehicles are to drive and park on sealed surfaces only.</li> <li>▪ Avoid maintenance works near landscaped areas of the sites</li> </ul>	<ul style="list-style-type: none"> <li>▪ All staff and subcontractors</li> </ul>
<b>Injury to fauna</b>	<ul style="list-style-type: none"> <li>▪ Report any injured or killed animals to WIRES as soon as possible</li> <li>▪ Manage food waste in sealed bins to discourage foraging animals</li> </ul>	<ul style="list-style-type: none"> <li>▪ All staff and subcontractors</li> </ul>

#### 8.5.3. Key Performance Criteria

Description	Responsibility	Deliverable	Target
Zero incident of unauthorised felling of trees or harm to flora and fauna species of significance	<ul style="list-style-type: none"> <li>▪ Workshop</li> </ul>	Inspection	100%

### 8.6. Community disruption

Community disruption may occur as a result of standard operations or discreet planned activities.

Engagement with stakeholders and the community are addressed as part of the Stakeholder Engagement Plan, however where key elements relating to environmental impacts such as noise, light or traffic congestion are addressed below.

## 8.6.1. Environmental Aspect and potential Impacts

- Disruption as a result of major interruption or works
- Noise or stray lighting produced from depot workshop and parking
- Noise produced from bus engines.

Potential impacts:

- Traffic congestion
- Nuisance complaint resulting in poor relationship or reputational impacts
- Legal non-compliance.

## 8.6.2. Mitigation Approach

Aspect	Management	Responsibility
<b>Community consultation and engagement</b>	<ul style="list-style-type: none"> <li>▪ When communicating with the community in regard to activities, the following principles (as appropriate) will be applied to ensure the consultation process is inclusive, meaningful, useful and effective.                             <ul style="list-style-type: none"> <li>– Timely: Consultation should occur when the community has time to express their views which will have the best chance of influencing outcomes.</li> <li>– Inclusive: Allowing all interested parties to be involved in the consultation process.</li> <li>– Effective: Be clear on how decisions will be made so that participants understand the impact of their involvement. Communicate changes or potential impacts to the community within an acceptable period.</li> </ul> </li> <li>▪ Record complaints as an incident. Investigate and respond accordingly.</li> <li>▪ Respond to complaints, within 2 business days.</li> <li>▪ Where possible, provide at least 1 week notice to the community before major interruption or impact, utilising notices in newspapers or letterbox drops.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Manager</li> </ul>
<b>Issues management</b>	<ul style="list-style-type: none"> <li>▪ Where inspections identify issues relating to vehicle or activity noise or lighting, an incident report will be raised, and corrective action applied to minimise the potential impact.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Manager</li> </ul>

## 8.6.3. Key performance criteria

Description	Responsibility	Deliverable	Target
Noise complaints are managed in accordance with the Complaints Handling Procedure. No non-conformances to the procedure.	<ul style="list-style-type: none"> <li>▪ Manager</li> </ul>	Complaints Register	0
Response to complaints addressed in 2 business days.	<ul style="list-style-type: none"> <li>▪ Manager</li> </ul>	Letter	100%
Provide communication to community 1 week before major interruption or impact.	<ul style="list-style-type: none"> <li>▪ Manager</li> </ul>	Letter/public notice	100%
Monthly inspections to address out-of-normal hours activities for noise and lighting impact.	<ul style="list-style-type: none"> <li>▪ Supervisors</li> </ul>	Inspection	Monthly

## 8.7. Monitoring and Corrective Actions

- Records of materials used and waste materials will be kept and reviewed and reported against monthly;
- KPIs to be monitored and reported against monthly;
- Staff educated in requirements of the KPIs;
- Supervisors/Managers to monitor operations and identify where non-conformance occurs;
- Site inspections undertaken of the sites in accordance with the audit and inspection schedule. Action items arising from the inspections will be logged and managed through the action tracker in MyOSH;
- Internal and external BMS audits will be conducted in line with the audit and inspection schedule;
- Annual review of environmental obligations and updating of the compliance register; and
- Environmental Management Plan KPIs will be reviewed annually and the Environment Management Plan updated accordingly.

## 9. References

- ISO14001 Environmental Management Systems
- Protection of the Environment Operations Act 1997
- Protection of the Environment Operations (Clean Air) Regulation 2010
- Protection of the Environment Operations (General) Regulation 2009
- Protection of the Environment Operations (Noise Control) Regulation 2008
- Protection of the Environment Operations (Waste) Regulation 2014
- Waste Avoidance and Resource Recovery Act 2001
- Environmentally Hazardous Chemicals Act 1985
- Environmentally Hazardous Chemicals Regulation 2008
- Contaminated Land Management Act 1997
- Contaminated Land Management Regulation 2013
- Code of Practice for the Safe Removal of Asbestos [NOHSC:2002 (2005)]
- AS1940:2017 The Storage and Handling of Flammable and Combustible Liquids
- 12.0 Internal Audit Procedure
- 12.1 Monitoring and Measurement Procedure
- 14.0 Incident and Investigation Procedure
- 14.1 BMS Improvement Procedure
- Compliance Register

## 10. Appendices

Appendix 1 – Environmental Risk Register

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## Appendix 1 – Environmental Risk Register

ID	Item	Sites	Area	Aspect	Impact to environment health and safety to all involved within the business operations	Control Procedures	Residual Risk Level
1	Storage of fuel	Brookvale Mona Vale North Sydney	Yard	Fugitive hydrocarbon emissions	Contribution to the greenhouse effect	Regular planned inspections for preventative maintenance program in action	Medium
2	Internal bus cleaning	Brookvale Mona Vale North Sydney	Yard	General waste removed buses from internal cleaning processes to be collected and sent to landfill.	Land occupation	Industrial bin located on site collected on a weekly basis. Any medical waste such as sharps disposed of appropriately.	Low
3	Bus Washing	Brookvale Mona Vale North Sydney	Bus Wash	Water used for cleaning of buses mechanically / manually. Leakage of waste water from the site.	Ground water / surface water pollution of soil contamination	Buses are washed in a dedicated area in the wash bay, and all water used is collected into a collection sump and then cycled through a triple interceptor on site.	Medium
4	Lighting - Flood lights on site	Brookvale Mona Vale North Sydney	Operations	Light overspill into neighbouring areas of the complex.	Disturbance to neighbours and local fauna.	Lights have been deigned to be used on site only with minimal overlay to neighbours / fauna	Low
5	Power usage / generation	Brookvale Mona Vale North Sydney	Operations	Power consumption and generation on site to attempt to be cost / usage neutral	Greenhouse effect and power consumption	Weekly monitoring of power generation from invertors and also regulating the power usage of yard lights due to seasonal changes.	Low
6	Servicing minor / major	Brookvale Mona Vale North Sydney	Workshop	Oil changed and topped up, air conditioning using 134A and R413A refrigerant gases and general supplier parts.	Potential hydrocarbons and contamination of soil, potential CFC contamination to atmosphere	All waste oils are removed offsite by a 3rd party supplier, and refrigerant gases are removed/reused by a registered 3rd party supplier.	Medium
7	Heavy Vehicle Emission / Noise (EnviroLaw)	Brookvale Mona Vale North Sydney	Operations	Obligation to comply with HVNL Act for Emission control and noise (refer to EnviroLaw checklist)	Visible emission pollution, and noise impact to the surrounding environment	Vehicles are services regularly and checked by Accredited Third Party . Noise levels meet the ARD (Australian Design Rules #28) to ensure that they are at an acceptable level in the urban environment	Low

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ID	Item	Sites	Area	Aspect	Impact to environment health and safety to all involved within the business operations	Control Procedures	Residual Risk Level
8	Bus movements	Brookvale Mona Vale North Sydney	Operations	Movement of buses along roads	Contribution to greenhouse effect / Visual impact	Buses are designed to the ADR, all buses purchased meet the latest design and construction techniques to ensure buses are delivering an efficient output. Weekly monitoring of fuel usage is a monitor of this factor. Ongoing maintenance program for ferries.	Medium
9	Storage of buses overnight	Brookvale Mona Vale North Sydney	Workshop	Potential risks of leakage of fuel and oil from buses.	Ground water / surface water pollution of soil contamination	Monitoring of depot sites for any potential leakages	Medium
10	Oil Storage	Brookvale Mona Vale North Sydney	Workshop	Risk of oil leakage containment weir.	Potential slippage	Maintenance inspection of bunding, cleaning of area on a regular basis. Inspected on weekly walk around by workshop supervisor.	Medium
11	Tyre storage	Brookvale Mona Vale North Sydney	Workshop	Waste rubber / disposal of cases	Land occupation	Third party supplier manages and controls disposal of expired tyres off site.	Medium
12	Storage of batteries	Brookvale Mona Vale North Sydney	Workshop	Acid leaking / gases emitted into workplace area.	Chemical leakage to surface area , ground contamination	Fibre glass tray on site for storage of batteries, mobile trollies for jumper sets. Staff visually inspecting areas on daily basis - visual awareness. Inspected by monthly walk around by workshop supervisor. Old batteries removed by a third party. Tracking facilities available	Medium
13	Parts Washing	Brookvale Mona Vale North Sydney	Workshop	Cleaning solution leakage to local surface area	Surface area contamination potential / runoff to ground surface area	Area runs off into triple interceptor area, third party supplier collects cleaning material every 6-8 weeks	Medium
14	Bus Fuelling	Brookvale Mona Vale North Sydney	Workshop	Potential risk of fuel spillage when refuelling at site.	Ground water / surface water pollution of soil contamination	Collection points into pit and triple interceptor are cleaned out on a regular basis internally and by a third party supplier	Medium



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ID	Item	Sites	Area	Aspect	Impact to environment health and safety to all involved within the business operations	Control Procedures	Residual Risk Level
15	Used Oil Filters (Removal)	Brookvale Mona Vale North Sydney	Workshop	Potential risk of spillage in working area and contamination of surface areas of the workplace.	Surface area contamination potential / runoff to ground surface area	Filters are collected and stored in 205 litre drum in a bunded area. Drum is collected by Third Party as required, and work areas are cleaned on a regular basis and runoff is collected and processed through the triple interceptor	Medium
16	Pit Drainage Service Area	Brookvale Mona Vale North Sydney	Workshop	Contaminants from pit area to triple interceptor	Leakage to surface area , ground contamination	Area is cleaned regularly, and the collection point in the pit is then transferred to the triple interceptor which is cleaned by a third party supplier.	Medium
17	Oil Drainage	Brookvale Mona Vale North Sydney	Workshop	Potential risk of leakage and spillage	Surface area contamination potential / runoff to ground surface area	Visual awareness of collection sump when servicing vehicles for an oil change and ensuring the oil is transferred to the collection tank to be collected by 3rd party supplier. Tracking facilities used.	Medium
18	Emptying of mop buckets and cleaning equipment	Brookvale Mona Vale North Sydney	Workshop	Oil and diesel not contained in bunded area and leaking into soil near creek	soil and water pollution	No cleaning gear to be emptied onto concrete pad or roadway under any circumstance. Cleaners have been advised and instructed in how to dispose of cleaning water.	Low
19	Heavy Vehicles - Emissions to air (EnviroLaw)	Brookvale Mona Vale North Sydney	Workshop	Ensuring that vehicles meet the sections 96-98 of the HVNR Standards	Air quality can be impacted by visible emissions	Buses are regularly serviced and pass Transport Inspections	Low
20	General Environmental Duty (EnviroLaw)	Brookvale Mona Vale North Sydney	Admin, Bus Wash, Operations, Workshop, Yard, Wharf	To carry out duties taking all reasonable and practicable measures to prevent and minimise environmental harm.	Impact to environment health and safety to all involved within the business operations	Ensuring best practice for all activities.	Low
21	Spill Containment / Spill Response (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Workshop, Yard, Wharf	A PCBU must ensure where hazardous materials used, handled , stored etc are not at risk of a spill , leak, and provision is made for spill containment system.	WHS for employees, contractors, visitors, environment.	Regular monthly walk through audits are conducted to detect and issues. (Refer to EnviroLaw - Work Health and Safety Act 2011.	Low

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ID	Item	Sites	Area	Aspect	Impact to environment health and safety to all involved within the business operations	Control Procedures	Residual Risk Level
22	Storage and handling systems (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Admin, Bus Wash, Operations, Workshop, Yard, Wharf	A PCBU must a system used at the workplace for handling and storage of hazardous chemicals is only used for a purposed designed for. Refer to EnviroLaw checklist.	WHS for employees, contractors, visitors, environment.	Regular monthly walk through inspections, staff Tool Box meetings, notices and training inductions.	Low
23	Ignition sources - (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Admin, Operations, Workshop, Yard, Wharf	To ensure that an ignition source is not introduced into a hazardous area to mitigate risk of fire / explosion in the workplace.	WHS for employees, contractors, visitors, environment.	Regular monthly walk through inspections of workplaces.	Low
24	Hazardous Material - risk management - (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Workshop, Yard, Wharf	A PCBU must identify any risk of physical / chemical reaction in relation to hazardous chemical used, handled, and stored.	WHS for employees, contractors, visitors, environment.	Monthly walk through inspections at the sites.	Low
25	Hazardous Material - Safety Datasheets (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Workshop, Yard, Wharf	Obtain the current safety data sheets for hazardous chemicals and to ensure that information about safe use, handling, storage is accessible to people using these hazardous materials.	WHS for employees, contractors, visitors, environment.	Keolis Downer uses CHEMWATCH which contains current registers of chemicals at the sites operated, these are updated on a regular basis to ensure currency.	Low
26	Hazardous Material - Dangerous Incident Notification (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Admin, Bus Wash, Operations, Workshop, Yard	A PCBU must ensure immediate notification of any dangerous incident to the Department of Justice , Writing within 48 hours and record to be kept 5 year	WHS for employees, contractors, visitors, environment.	Refer to CIM Plans / disaster recovery plan.	Low
27	Noise - Restriction of Activities (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Workshop	Do not permit audible noise from the operation of workshop equipment (ie loud noise making equipment, compressors etc) on Sundays and Pub Holidays before 8:00am and after 7:00pm	Surrounding environment / residential areas nearby.	Sites are deemed in commercial areas, however it is noted as an EPA requirement.	Low

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ID	Item	Sites	Area	Aspect	Impact to environment health and safety to all involved within the business operations	Control Procedures	Residual Risk Level
28	Noise - Noise Emission Heavy Vehicle (EnviroLaw checklist)	BrookvaleMona ValeNorth Sydney	Workshop	Ensuring heavy vehicles have a stationary noise level of less than 5db as per the ADR's and the National Heavy Vehicle Regulations (sections 104-105)	WHS employees, travelling public, general public, general community.	Vehicle are released from the manufacturer and also inspected on a regular basis of every 6 months accredited third party independent inspector	Low
29	Sewer - Discharge to Sewer / Pollution of Water System (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Operations, Workshop, Yard	Do not discharge any trade waste or seepage water to the local government sewerage system without approval.	WHS, Employees, Local Government sewer system, environment	Sites are registered with Hunter Water and are inspected on a regular 12 monthly basis. Please refer to permits attached.	Low
30	Sewer - Backflow Prevention (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Workshop	To ensure that installed backflow units are inspected annually by a licenced person.	Unity water grid system	Inspected annually by a third party and controlled by the body corporate.	Low
31	Waste Management - Waste Mgmt / Dumping of Waste (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Admin, Bus Wash, Operations, Workshop, Yard	Ensure waste is managed in accordance to the local / state requirements strategy/s. Waste tracking notices issued by Transpacific.	WHS, employees, public, environment	Third party collects general and recycle waste from sites on a weekly basis.	Low
32	Waste - General & Industrial / Local Govt requirements (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Admin, Operations, Workshop, Yard	Comply with local government requirements for general waste and industrial waste.	WHS, employees, environment.	Third party contractors are engaged to removed general and industrial waste on a weekly basis from the sites for both depots	Low

# ENVIRONMENTAL MANAGEMENT PLAN



ID	Item	Sites	Area	Aspect	Impact to environment health and safety to all involved within the business operations	Control Procedures	Residual Risk Level
33	Water - Pollution of Water (EnviroLaw checklist)	Brookvale Mona Vale North Sydney	Bus Wash, Operations, Workshop, Yard	Do not deposit prescribed water contaminants or release storm water run off into stormwater drains, and not to discharge trade waste into storm water drains.	WHS, employees, environment	Third parties collect trade waste and cleaner triple interceptors on a regular basis, and these suppliers are audited for compliance.	Low
34	Spraying of bus panels in a non-spray booth	Brookvale Mona Vale North Sydney	Workshop	ensure that isocyanide and non poisonous paints are not used with an adequate spray booth.	health impacts	removal of threat - no onsite spraying to be continued	Low