

# Precision Group Environmental Management Plan

Procedure Title	Environmental Management Plan
Parent Policy	N/A
Date Effective	21 November 2019
Review Date	10 November 2020
Procedure Owner	Director and Manager
Category	Draft 0.1 – Awaiting EPA transport licence
Version Number	0.1
Content Enquiries	<a href="mailto:ckantros@precisiongroupnt.com.au">ckantros@precisiongroupnt.com.au</a>
Scope	This procedure applies to staff, visitors and contractors of all Precision Group activities.
Purpose	This document defines the environmental management systems of the Precision Group for all activities including identified high risk activities.

\* Note that all printed paper/hard copies of this document and related procedures are uncontrolled.

## Contents

1.	Environmental Policy Statement .....	3
2.	Introduction .....	3
3.	Company Activities .....	4
4.	Activities Producing Hazardous Waste .....	4
4.1.	Asbestos.....	4
4.2.	Sewerage Waste .....	4
5.	Approvals and Licencing .....	4
6.	Implementation .....	5
6.1.	Environmental Objectives and Targets .....	5
6.2.	Duties of Management, Workers and Sub-Contractors.....	5
6.2.1	Duties of Management .....	5
6.2.2	Duties of Workers and Sub-Contractors .....	5
6.3.	Training.....	5
6.4.	Risk Assessments .....	6
6.4.1	Determine the consequences.....	6
6.4.2	Determine the likelihood .....	6
6.4.3	Determine the risk level.....	7
6.4.4	Recommended action guide .....	7
6.5.	Environmental Monitoring Plan.....	8
6.6.	Emergency Planning and Responses.....	9
6.6.1	Safe Work Method Statements (SWMS) and JSEA's .....	9
6.6.2	Emergency Management Plans .....	9
7.	Monitoring and Review .....	10
8.	Continual Improvement.....	11
9.	References .....	11
10.	Site Plan (Proposed).....	12

## 1. Environmental Policy Statement

The Precision Group will ensure that they will prevent pollution, reduce the likelihood of pollution occurring, avoid and reduce the generation of waste, increase the re-use and the recycling of waste where possible, effectively manage waste disposal, encourage sustainable development and implement environmental protection measures. All relevant environment protection objectives are taken into consideration and have been incorporated into the company management systems so not to adversely affect the environment and its surroundings.

## 2. Introduction

The Precision Group maintains a series of business systems which comply to international standards and include:

- Work Health and Safety System
- Quality Management Systems
- Environmental Management Systems

The Precision Group Environment Management Plan (EMP) provides the overall framework for environmental management at Precision Group sites including construction and maintenance project and activities undertaken at the workshop locations at 4 and 5 Frank Ct. Berrimah. This EMP outlines the management practices for the key risks affecting the environment for Precision Group activities and has been prepared with consideration to the relevant legislation, codes and standards and environmental reference documents.

The common principles and approach of these Standards have been used as the basis of both the overall management system and the individual system procedures within it as follows:



PLAN	Establish and <b>plan</b> the objectives and process necessary to deliver results in accordance with client requirements and company policies ( <i>i.e. develop and maintain policies and system procedures, prepare project management plans and delegate responsibilities</i> )
DO	<b>Implement</b> the process ( <i>i.e. use system procedures &amp; project management plans to ensure our methods are consistent</i> )
CHECK	<b>Monitor</b> and measure processes and products against requirements and report results ( <i>i.e. audit, inspect and review implementation and compliance</i> )
ACT	Take actions to continually <b>improve</b> process performance ( <i>i.e. take corrective and preventative actions, review suitability, relevance and effectiveness and take actions to continually improve performance</i> )

### 3. Company Activities

The Precision Group NT is a panel maintenance contractor for the NT Department of Local Government, Housing and Community Development. The activities performed by Precision Group encompass all repairs and maintenance to government housing which include, but are not limited to:

- General repairs and maintenance
- Kitchen joinery and cabinetry
- Aluminium window and door screen manufacture and installation
- Glazing
- Security and locksmithing
- Electrical
- Plumbing
- Painting
- Yard clearing
- Asbestos removal

### 4. Activities Producing Hazardous Waste

Activities undertaken by the Precision Group generate waste products listed as hazardous materials under *Schedule 2* of the Northern Territory *Waste Management and Pollution Control Regulations (1998)* and restrictions are placed on the handling and transport of hazardous waste products by the Northern Territory Environmental Protection Agency (NT EPA). As such, the Precision Group maintains a register of hazardous waste products listed by the NT EPA, the details of which are listed below.

#### 4.1. Asbestos

The Precision Group holds a B Class (non-friable) asbestos removal licence (Licence No. 36964) and performs asbestos removal upgrades to public housing which has a significant asbestos legacy in vinyl floor tiles, tile adhesives and cement sheet eaves and soffit linings. All asbestos removal is conducted in compliance with the NT Work Health and Safety Act, Regulations and Codes of Practice, approved by NT WorkSafe prior to commencement and monitored by a licenced asbestos assessor.

All asbestos waste must be transported to a registered waste management facility with a licence to accept asbestos in a vehicle nominated by the Precision Group and registered with the NT EPA. Temporary storage may be required from time-to-time when work is conducted on weekends and appropriately bagged waste will need to remain on vehicles or in a locked storage container until the registered waste management facility is open for the receipt of waste.

#### 4.2. Sewerage Waste

The acquisition of a vacuum/sucker truck has provided the opportunity for the Precision Group to undertake its own sewerage system cleaning and transport the waste to the treatment facility directly. The operation of the vacuum/sucker truck uses high a pressure vacuum to remove blockages and excess water from sewerage systems during maintenance. The wastewater is collected within the pressure vessel of the vacuum unit and remains sealed until delivered to the waste treatment facility where it is pumped into the treatment ponds. Waste may remain sealed within the pressure vessel for several days until a load is delivered to the waste treatment facility.

### 5. Approvals and Licencing

The NT EPA has issued the Precision Group with an EPA licence

Insert details on award
-------------------------

## **6. Implementation**

### **6.1. Environmental Objectives and Targets**

The Precision Group Environmental Strategic Plan outlines objectives and targets for the financial year and these are cascaded to Divisions for implementation. Objectives and targets specific to this project are outlined in includes programs to support the following focus areas:

- Gain an understanding into the environment on our journey towards zero environmental incidents;
- Drive Leadership and Operational Accountability through the line management structures of projects and divisions;
- Simplify, consolidate and ensure the practicality of management systems for our people;
- Develop the culture and behaviours that distinguish us as a safe, caring and sustainable business

### **6.2. Duties of Management, Workers and Sub-Contractors**

#### **6.2.1 Duties of Management**

Precision Group Managers must exercise due diligence to ensure that the Precision Group fulfills its legal obligations and environmental care. This includes taking reasonable steps:

- To acquire and keep up-to-date knowledge of environmental matters;
- To gain an understanding of the nature of the operations of the business and generally of the environmental hazards and risks associated with those operations;
- To ensure that the company has available for use, and uses, appropriate resources and processes to eliminate or minimize environmental risks from work carried out by Precision Group;
- To ensure that Precision Group has appropriate environmental processes for receiving and considering information regarding environmental incidents, hazards and risks and responding to them in a timely manner; and
- To ensure that Precision Group has, and implements, processes for complying with environmental standards as determined by legislation e.g. reporting to EPA incidents, consultation with workers etc.

#### **6.2.2 Duties of Workers and Sub-Contractors**

While at work, a worker or sub-contractor must:

- Take reasonable care of the working environment;
- Take reasonable care that his or her acts or omissions do not adversely affect the environment;
- Comply, so far as is reasonably able, with any reasonable instruction that is given by Precision Group;
- Cooperate with any reasonable policy or procedure of Precision Group relating to the environment at the workplace that has been communicated to workers.

### **6.3. Training**

The minimum requirements for Precision Group employees engaged in construction, other workplace operations, or undertaking work at construction projects or workshops and includes:

- General Industry OHS Induction/Safety Awareness Training for the Construction Industry;
- Workplace specific induction (company and project/site based) including emergency response

- Relevant trade and certificates, competencies and licences for each task.

Additional health, safety and environment training needs may be identified as required in each employee's performance review held with the employee's direct manager. Records of subcontractor qualifications, competencies and specific industry induction requirements are photocopied at site induction and retained at the project/workplace.

#### 6.4. Risk Assessments

The Environmental Risk Assessment Procedure provides a consistent standard for rating environmental risks across the Precision Group operations and will improve decision making in choosing the most appropriate and adequate risk control measures. This procedure aims to provide more effective management of environmental risks and impacts.

##### 6.4.1 Determine the consequences

Use Table 1 to determine the most probable consequence in terms of harm should an event occurs with existing risk controls.

**Table 1 - Consequences**

Level	Descriptor	Consequences examples
1	Catastrophic	Long term environmental damage (5 years or longer), requiring \$5 million to correct or in penalties
2	Major	Medium-term (1-5 years) environmental damage, requiring \$1 to 5 million to study or correct
3	Moderate	Short-term (less than 1 year) environmental damage, requiring up to \$1 million to correct
4	Minor	Environmental damage, requiring up to \$150,000 to study or correct
5	Insignificant	Negligible environmental impact, managed within operating budgets

##### 6.4.2 Determine the likelihood

Use Table 2 to determine the most probable likelihood of the determined consequence occurring.

**Table 2 - Likelihood**

Level	Descriptor	Likelihood of the risk arising and leading to the assessed level of consequence	
A	Almost certain	Is expected to occur in most circumstances and has a history of occurrence?	Once a year or more frequent
B	Likely	Will probably occur in most circumstances?	Once in 1 to 3 years
C	Possible	Could occur at some time?	Once in 3 to 10 years
D	Unlikely	Not likely to occur in normal circumstances?	Once in 10 to 50 years
E	Rare	May occur only in exceptional circumstances?	Once in 100 years or more

#### 6.4.3 Determine the risk level

Use Table 3 to determine the risk level for each identified hazard.

**Table 3 – Risk Matrix**

Likelihood	Consequences				
	Catastrophic 1	Major 2	Moderate 3	Minor 4	Insignificant 5
Almost certain A	Extreme	Extreme	High	High	Medium
Likely B	Extreme	Extreme	High	Medium	Low
Possible C	Extreme	High	Medium	Medium	Low
Unlikely D	High	Medium	Medium	Low	Low
Rare E	High	Medium	Low	Low	Low

#### 6.4.4 Recommended action guide

Use Table 4 to determine the action required based on the determined risk level. All activities must be controlled to as low as reasonably practicable using the hierarchy of risk controls. No activities rated at Extreme or High can proceed until additional risk controls have been implemented to reduce the risk level.

**Table 4 – Recommended Action**

Risk level	Recommended Action
Extreme	<b>Act immediately</b> - The proposed or identified task or process activity must be stopped immediately. Steps must be taken to lower the risk level to as low as reasonably practicable using the hierarchy of risk controls.
High	<b>Act today</b> - The proposed or identified activity can only proceed, provided that: <ul style="list-style-type: none"> <li>i. the risk level has been reduced to as low as reasonably practicable using the hierarchy of risk controls.</li> <li>ii. the risk controls must include those identified in legislation, Australian Standards, Codes of Practice etc.</li> <li>iii. the risk assessment has been reviewed and approved by the Supervisor.</li> <li>iv. a Safe Working Procedure or Safe Work Method has been prepared, and</li> <li>v. the supervisor must review and document the effectiveness of the implemented risk controls.</li> </ul>
Medium	<b>Act this week</b> - The proposed or identifies task or process can proceed, provided that: <ul style="list-style-type: none"> <li>i. the risk level has been reduced to as low as reasonably practicable using the hierarchy of risk controls;</li> <li>ii. the risk assessment has been reviewed and approved by the Supervisor, and;</li> <li>iii. a Safe Working Procedure or Safe Work Method has been prepared.</li> </ul>
Low	<b>Act this month</b> - Managed by local documented routine procedures which must include application of the hierarchy of controls.

### 6.5. Environmental Monitoring Plan

The ongoing monitoring of licenced hazardous waste is required to ensure that all management strategies in place meet the objectives of the environmental management plan. In order to manage the hazardous waste that is transported in the Precision Group vehicles and/or stored on-site temporarily, the following monitoring plan strategies are required:

**Table 5 – Environmental Monitoring Plan**

Waste Material	Monitoring Activity	Responsibility
Asbestos	<ul style="list-style-type: none"> <li>• Maintain an on-site asbestos register for waste stored temporarily on site (<i>NT WHS Reg. 425</i>).</li> <li>• Ensure that the designated spill kit for asbestos waste is located in each vehicle licenced to transport hazardous waste is intact and on the vehicle prior to collection of asbestos waste.</li> <li>• Conduct daily inspection of waste storage container while waste is in storage</li> <li>• Asbestos removal supervisor must be on premises or within 20 minutes travel during transfer of waste to and from container (<i>COP - How to Safely Remove Asbestos Sect. 3.1</i>).</li> </ul>	Director Manager Asbestos Removal Supervisor Reviewed by OHS Committee
Sewerage Waste	<ul style="list-style-type: none"> <li>• Pre-start for sucker truck to be conducted each day which includes:               <ul style="list-style-type: none"> <li>– Checking pressure vessel and all fittings and attachments;</li> <li>– Checking spill kit is in location and all items present;</li> <li>– Maintaining a daily pre-start check in a logbook;</li> <li>– Maintaining a logbook for all journeys;</li> <li>– Maintaining a log of collection Date, Time, Location, Volume and period of time stored in vehicle.</li> </ul> </li> <li>• Waste is to be stored in the truck for the minimum amount of time (&gt;5 days) prior to disposal at the waste treatment facility.</li> <li>• The minimum amount of travel between sites is allowed with effluent in the pressure vessel to reduce the potential for incidents.</li> <li>• Truck is to be washed at waste treatment facility when emptied.</li> </ul>	Truck Operator Director Manager Reviewed by OHS Committee
Solid Waste – General	<ul style="list-style-type: none"> <li>• All general waste to be stored in bins or laydown areas designated for collection,</li> <li>• No overflowing bins or storage of materials that cannot reasonably be re-used.</li> <li>• Review of waste in storage and storage methods to be addressed during each OHS committee meeting site inspection.</li> </ul>	Director Manager Reviewed by OHS Committee



Liquid Waste - General	<ul style="list-style-type: none"> <li>All liquid waste must be stored in appropriate containers for each waste classification.</li> <li>Transport and disposal of bulk liquid wastes must be reviewed prior disposal to ensure compliance with all regulations.</li> <li>Storage of liquid waste must be reviewed by OHS Committee and expert guidance sought if required.</li> </ul>	Director Manager Reviewed by OHS Committee
Noise	<ul style="list-style-type: none"> <li>Noise must be monitored, and all activities must not exceed the comfort level of the most noise sensitive person in the workplace.</li> <li>All employees are encouraged to speak out about noise issues and report to the OHS Committee for review.</li> <li>Review of noise complaints by the OHS Committee must consider further guidance from external expertise and/or review controls in accordance with the <i>Hierarchy of Controls</i>.</li> </ul>	Director Manager All Employees Reviewed by OHS Committee

## 6.6. Emergency Planning and Responses

### 6.6.1 Safe Work Method Statements (SWMS) and JSEA's

Where an environmental risk has been identified, the SWMS and JSEA's for those tasks must be updated and signed by all Precision Group employees prior to commencing. Subcontractors or other workers that will undertake high-risk construction work are required to provide a Safe Work Method Statement (SWMS) (or equivalent) for the high-risk construction work they are to undertake prior to its commencement. The Precision Group supervisor must review this SWMS to ensure that it is satisfactory. The Environmental Plan and related SWMS must outline the management, supervision and control measures to be implemented by the subcontractor or other workers for all environment, health and safety risks associated with the contracted high-risk construction work to be carried out.

### 6.6.2 Emergency Management Plans

In the event of spillage or other incident involving sewerage or asbestos containing material(s), both known or suspected, the following incident management procedure is to be followed by all persons employed as staff or contractors:

- Stop work immediately;
- If first aid is required, administer first aid and respond to immediate risks first;
- Each vehicle licenced to transport hazardous waste has an ABE Class fire extinguisher and first aid kit. Attempt to extinguish any fire with the fire extinguisher and treat people requiring immediate first aid (e.g. bleeding or airway obstruction) if it is safe to do so;
- If incident is serious and involves injuries to one or more people and/or damage to vehicles causing traffic hazards etc.; contact NT Police Fire and Emergency Services first via '000';
- Each vehicle licenced to transport hazardous waste contains a spill kit designated for each hazardous waste product. Obtain the spill kit when safe to do so and use the materials within as directed below;
- Isolate the area of contamination and prevent entry to the area using bunting or barrier mesh contained in the spill kit;
- Place warning signs at entry points to the area or if none available, place a person on duty to maintain security of the perimeter if possible until signs become available;

- Don PPE appropriate for each hazardous material and treat the spillage as far as reasonably practicable;
- Report to Manager or Director immediately or at least within 1 hour of incident if urgent safety issues are more immediate priority;
- Contact a hazardous materials consultant as soon as practicable for further assessment and remediation processes to be put in place;
- Notify the NT EPA and NT WorkSafe as soon as practicable;
- Provide a written communication plan to any nearby residents and affected personnel within 24 hours of the incident notification, including details of any remedial works that are required to be undertaken;
- The Precision Group employee has control of the site until relieved by a more senior member of staff, one who has a higher level of training or relieved by NT Police Fire and Emergency Services.
- Where an asbestos incident occurs involving other hazardous materials, the hazardous materials consultant will provide direction on the immediate incident response unless escalated to NT Police Fire and Emergency Services control of the site.

When notified, the Responsible Person must follow the internal hazard/incident recording reporting and investigation procedure.

**Table 6 – Reporting Plan**

Occurrence/Incident/Report	Initiator	Action
All Environmental Incidents	All site personnel	Report to Manager or Director within 1 hour of incident. Complete incident report within 24 hours.
Serious Environmental Incidents, (Class 1 incident)	Project Manager	Manager and/or Director to report incident to the EPA as the Regulatory Authority immediately.  NT Police Fire and Emergency Services may be required as the first point of contact via '000' if vehicle damage, other hazards exist and/or injury to people has occurred.
Complaints Register	Site Manager	The Site Manager is to record all complaints made by surrounding neighboring businesses and customers.
Hazard Reduction Plan for Site	Site Manager	The Site Manager will maintain a hazard reduction plan. All reported hazards are to be reported to the Manager in timely manner.

## 7. Monitoring and Review

Progress against the objectives and targets are monitored by the Precision Group Management via weekly toolbox meetings, pre-start meeting minutes and WHS committee meetings. Reporting of environmental issues and concerns are to be raised as part of the standard meeting agenda and discussions of environmental issues and awareness is to be encouraged at all meetings.

---

## 8. Continual Improvement

The Precision Group is committed to the continual improvement of all business processes including, the management of the environment and waste alongside other commitments to WHS and quality. An ongoing process of review and improvement will enable the Precision Group to grow the awareness and compliance with sound environmental management processes as the company develops. The process will be met by having the courage to recognise deficiencies in policies, processes and training and improve upon them in a continuous manner.

## 9. References

Waste Management and Pollution Control Act NT (1998)  
Waste Management and Pollution Control Regs NT (1998)  
Work Health and Safety Regulation NT (2011)  
Code of Practice – How to Safely Remove Asbestos  
Code of Practice – How to Manage and Control Asbestos in the Workplace

## 10. Site Plan (Proposed)

