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# **KURRI KURRI ALUMINIUM SMELTER DECOMMISSIONING, DEMOLITION AND REMEDICATION TRAFFIC MANAGEMENT PLAN**

# **KURRI KURRI ALUMINIUM SMELTER DECOMMISSIONING, DEMOLITION AND REMEDiation TRAFFIC MANAGEMENT PLAN**

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Made by **C Whitehill**  
Checked by **S Taylor**  
Approved by **F Robinson**  
Description **Ramboll was engaged by Hydro Aluminium Kurri Kurri Pty Ltd to prepare an Environmental Management Plan (EMP) to describe how environmental management would be undertaken at the former Hydro Aluminium Kurri Kurri aluminium smelter at Hart Road Loxford, NSW and the surrounding land owned by Hydro. This Traffic Management Plan forms a component of the EMP.**

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## ACRONYMS AND ABBREVIATIONS

EMP	Environmental Management Plan
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
Hydro	Hydro Aluminium Kurri Kurri Pty Ltd
IPMP	Integrated Project Management
LoS	Level of Service
RMS	Roads and Maritime Services
RWEMP	Remediation Works Environmental Management Plan
SAP	Smelter Access Plan
SSD	State Significant Development
TMP	Traffic Management Plan
WHS	Workplace Health and Safety

## GLOSSARY

Council	Cessnock City Council
Department	Department of Planning, Industry and Environment
Hydro	Hydro Aluminium Kurri Kurri Pty Ltd
Hydro Land	The land owned by Hydro Aluminium Kurri Kurri Pty Ltd which includes the Smelter and surrounding land.
Remediation	Remediation of contaminated land and soils at the Smelter and on Hydro Land, including the construction of a Containment Cell as addressed in the State Significant Development application to the Department of Planning, Industry and Environment SSD 6666.
Stage 1 Demolition	Demolition of Smelter buildings addressed in the development application to Cessnock City Council 8/2015/399/1.
Stage 2 Demolition	Demolition of Smelter buildings, three concrete stacks, a water tower, subsurface structures to 1.5 m below ground surface and operation of a concrete crushing plant addressed in the development application to Cessnock City Council 8/2018/46/1.
The Smelter	The former Hydro Aluminium Kurri Kurri Pty Ltd aluminium smelter at Hart Road, Loxford

# 1. INTRODUCTION

## 1.1 Background

This Traffic Management Plan (TMP) has been prepared by Ramboll Australia Pty Ltd on behalf of Hydro Aluminium Kurri Kurri Pty Ltd (Hydro) to support the Remediation Works Environmental Management Plan (RWEMP) which addresses the decommissioning, demolition and remediation activities at the former Hydro Aluminium Kurri Kurri Smelter (the Smelter) at Hart Road Loxford and the management of the surrounding land owned by Hydro (the Hydro Land).

## 1.2 Objectives

The objectives of this TMP are to:

- Identify traffic route requirements for traffic travelling to and from the Smelter and Hydro Land on public roads, including oversize vehicles.
- Establish the roles and responsibilities of all parties involved in traffic movement and control.
- Establish supervision, monitoring and reporting framework for the TMP.

## 1.3 Purpose and Scope

The purpose of the TMP is to:

- Specify procedures for management of offsite traffic related issues and impacts during activities at the Smelter and on the Hydro Land.
- Satisfy the relevant conditions of the development consent for demolition activities (DA 8/2015/399/1 and DA 8/2018/45/1).
- Satisfy the relevant conditions of the development consent for remediation activities (SSD 6666).

## 1.4 Regulatory Requirements

### 1.4.1 Project Approval

A list of the development consent conditions related to traffic management and where they are addressed in this document are outlined in **Table 1-1**.

It should be noted that some of the conditions listed below are addressed within the Smelter Access Plan (SAP) which forms Appendix B of the EMP.

**Table 1-1: Project Approval Conditions**

No.	Condition	Location in TMP
<b>SSD 6666</b>		
<b>Remediation Works Conditions</b>		
B25	The Applicant must ensure that:	N/A
a	the development does not result in any queuing on the public road network unless otherwise approved by the relevant council;	Table 3-2
b	all vehicular movement to and from the site must be in a forward direction;	Table 3-2
c	the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guideline;	Refer to the SAP
d	all loading and unloading of materials are carried out on-site in designated areas; and	Table 3-2
e	vehicle manoeuvring areas must always be kept clear of any obstacles, including parked cars.	Refer to the SAP
<b>Parking</b>		
B26	The Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that traffic associated with the development does not utilise public and residential streets or public parking facilities.	Table 3-2

No.	Condition	Location in TMP
<b>DA 8/2015/399/1</b>		
10	Submit to Council an Environmental Management Plan (EMP) for review and written authorisation. The EMP shall contain, but not be limited to, the following specialist plans: Air Quality Management Plan, Noise and Vibration Management Plan, Waste Management, Soil and Water Management Plan, Demolition Strategy, <b>Traffic Management Plan</b> , Stakeholder Engagement and Notification Plan; Work Health and Safety Management Plan; and Heritage Management Measures and shall include, among other things, legislative and regulatory requirements; responsibilities for implementation of the management measures; and the monitoring, recording and improvement for environmental management performance.	This TMP
14(h)	All vehicles leaving the site with demolition materials must be loaded and managed to avoid the spillage of waste in accordance with Clause 70 of the Protection of the Environment Operations Regulation 2014, and vehicles must not track soil and other materials onto public property (footpaths, roads, reserves, etc) and the footpaths must be suitably protected against damage when plant and vehicles access the site.	Table 3-2
15	Submit a Construction Management and Traffic Management Plan (CMTMP) detailing the following matters. The plan must be submitted to the Council as satisfying these matters prior to the commencement of works.	This TMP
15(a)	A plan view of the entire site and frontage roadways indicating:	Figure 2 1
15(a)(i)	Dedicated construction site entrances and exits, controlled by a certified traffic controller, to safely manage pedestrians and construction related vehicles in the frontage roadways.	Figure 2-1
15(a)(vii)	An onsite parking area for employees, tradespersons and construction vehicles as far as possible.	Figure 2 1
15(e)	All traffic control plans must be in accordance with the RMS publication <i>Traffic Control Worksite Manual</i> and prepared by a suitably qualified person (minimum 'red card' qualification). The main stages of the development requiring specific construction management measures are to be identified and specific traffic control measures identified for each stage.	Table 3 2
	Approval is to be obtained from Council for any temporary road closures or crane use from public property. Applications to Council shall be made a minimum of six (6) weeks prior to the proposed activity being undertaken	Noted
25	All access crossings and driveways shall be maintained in good order for the life of the development.	Table 3-2
<b>DA 8/2018/46/1</b>		
10	The applicant must prepare a Construction Management and Traffic Management Plan (CMTMP) detailing the following matters. The plan must be submitted to and approved by Council prior to the commencement of works.	This TMP
10(a)	A plan view of the entire site and frontage roadways indicating:	Figure 2 1
10(a)(i)	Dedicated construction site entrances and exits, controlled by a certified traffic controller, to safely manage pedestrians and construction related vehicles in the frontage roadways.	Figure 2-1
10(a)(vii)	An onsite parking area for employees, tradespersons and construction vehicles as far as possible.	Figure 2 1
	Approval is to be obtained from Council for any temporary road closures or crane use from public property. Applications to Council must be made a minimum of six (6) weeks prior to the proposed activity being undertaken,	Noted

In addition, the plan aims to comply with the following legislation and guidelines:

- *Heavy Vehicle National Law (2018).*
- *Additional Access Conditions for oversize and overmass heavy vehicles and loads (RMS 2017).*
- *Traffic Control at Work Sites Manual (RMS 2018).*
- *Guide to Traffic Generating Developments (RMS 2002).*
- The Austroads Guidelines.

## 2. EXISTING ENVIRONMENT AND POTENTIAL IMPACTS

### 2.1 Local Road Network

The key public roads in the area surrounding the Smelter and Hydro Land include:

- M15 Hunter Expressway (Hunter Expressway). Two interchanges connect with the Hunter Expressway in the vicinity of the Proposal site: Hart Road Interchange and Kurri Kurri Interchange.
- Hart Road. Hart Road is a local road with the main purpose to provide access to and from the Smelter. Hart Road is an undivided road with one lane in each direction. Hart Road connects with Hunter Expressway via the Hart Road Interchange.
- Dickson Road. Dickson Road is a local road which intersects with the northern end of Hart Road and provides access to the eastern parts of the Hydro land, including properties leased by the Kurri Kurri Speedway and the Kurri Kurri Junior Motorcycle Club.
- Main Road - Cessnock Road. An arterial route connecting Maitland and Cessnock via Gillieston Heights, Cliftleigh, Heddon Greta, Kurri Kurri, Weston and Abermain. Main Road is connected with Hunter Expressway via Kurri Kurri Interchange. Main Road-Cessnock Road passes through the Kurri Kurri town centre as Lang Street, part of Mitchell Avenue and Northcote Street.

Results from traffic count surveys undertaken in February 2015 are outlined in **Table 2-1**. The results show existing peak hour traffic volumes on Hart Road, Main Road-Cessnock Road and the Hunter Expressway.

**Table 2-1: Peak Hour Traffic Volumes on Key Roads in 2015**

Site ID	Locations	AM Peak (vehicle movements)		PM Peak (vehicle movements)	
		NB/EB	SB/WB	NB/EB	SB/WB
M-1	Hart Road, northeast of Hunter Expressway	8	2	3	7
M-2	Hart Road, southwest of Hunter Expressway	374	216	237	350
M-3	Hunter Expressway, Between Loxford Interchange and Kurri Kurri Interchange	979	1,067	875	1,240
M-4	Hunter Expressway, south of Kurri Kurri Interchange	1,288	1,290	1,209	1,549
M-5	Main Road-Cessnock Road, east of Hunter Expressway	691	632	862	804
M-6	Main Road-Cessnock Road, west of Hunter Expressway	478	505	615	582

**Note:** NB: Northbound, EB: Eastbound, SB: Southbound, WB: Westbound

### 2.2 Traffic Generation

The number of daily truck movements would vary between five and 54 truck trips depending on the type and level of activity at the Smelter. The highest truck movements are expected to be during demolition activities with about 54 truck trips per day.

The number of daily car movements would vary between 24 and 75 car trips depending on the type and level of activity at the Smelter. The highest car movements are expected to be during the demolition activities with about 75 car trips per day.

### 2.3 Travel Routes

The designated traffic routes utilised by haulage vehicles travelling to and from the Smelter are shown on **Figure 2-1** and **Figure 2-2** and are as follows:

- Vehicles travelling between Newcastle, Sydney or south/ east of the Smelter: use the Hart Road interchange and travel southeast on the Hunter Expressway (and the opposite on return).
- Vehicles travelling north/west of the Smelter: use the Hart Road interchange and travel southeast on the Hunter Expressway and use the Kurri Kurri interchange exit. Go around the interchange and re-enter the Hunter Expressway and travel northwest on the Hunter Expressway (and the opposite on return).

The majority of small vehicles travelling to and from the Smelter would also use these traffic routes. A small number (approximately 15%) of site personnel vehicles would continue on Hart Road to the intersection with Government Road/ Sawyers Gully Road.

### 2.4 Potential Impacts

The Level of Service (LoS) criteria set by the Roads and Maritime Services (RMS) in the *Guide to Traffic Generating Developments* (RMS, 2002) is outlined in **Table 2-2**. For intersection performance, a LoS of "D" or better is generally acceptable to the RMS.

**Table 2-2: Level of Service Criteria for Intersections**

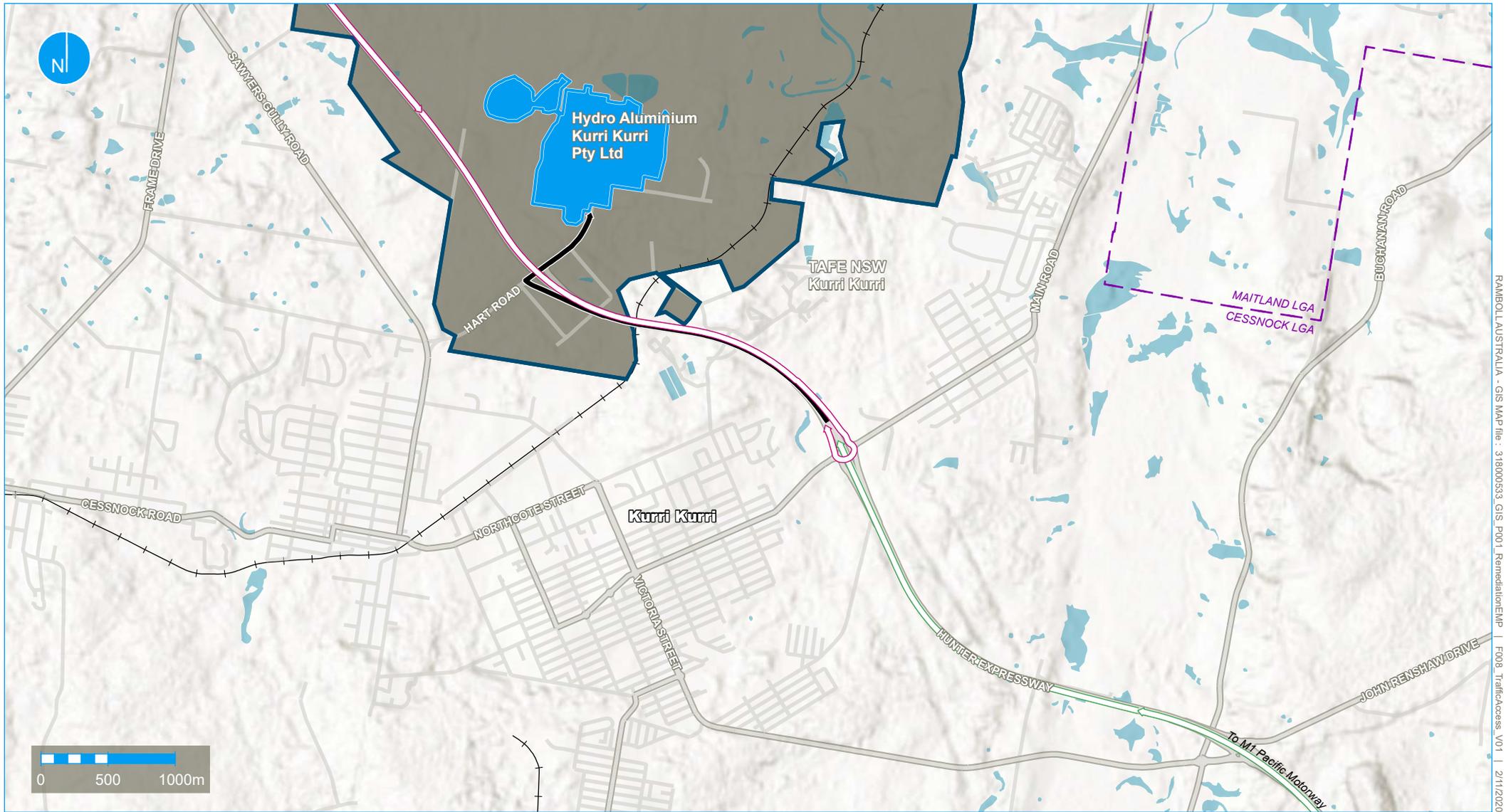
Level of Service	Average Delay (seconds/ vehicle)	Traffic Signals, Roundabout	Give Way and Stop Signs
A	Less than 14	Good operation	Good operation
B	15 to 28	Good with acceptable delays and spare capacity	Acceptable delays and spare capacity
C	29 to 42	Satisfactory	Satisfactory, but accident study required
D	43 to 56	Operating near capacity	Near capacity and accident study required
E	57 to 70	At capacity; at signals incidents will cause excessive delays	At capacity, requires other control mode
F	More than 70	Roundabouts require other control mode	NA

**Source:** *Guide to Traffic Generating Developments* (RMS 2002)

All Smelter traffic would pass through the intersection of Hart Road and the Hunter Expressway. **Table 2-3** shows the existing LoS of the Hart Road interchange intersection and the Kurri Kurri interchange.

**Table 2-3: Modelled Level of Service for Existing Condition**

Intersections	Intersection Control	AM Peak		PM Peak	
		Average Delay (seconds)	LoS	Average Delay (seconds)	LoS
Hart Road/Off Ramp	Give Way/ Yield	11.1	A	12.5	A
Hart Road/On-Ramp	Give Way/ Yield	10.9	A	10.7	A
Kurri Kurri interchange	Give Way/ Yield	9.3	A	9.3	A

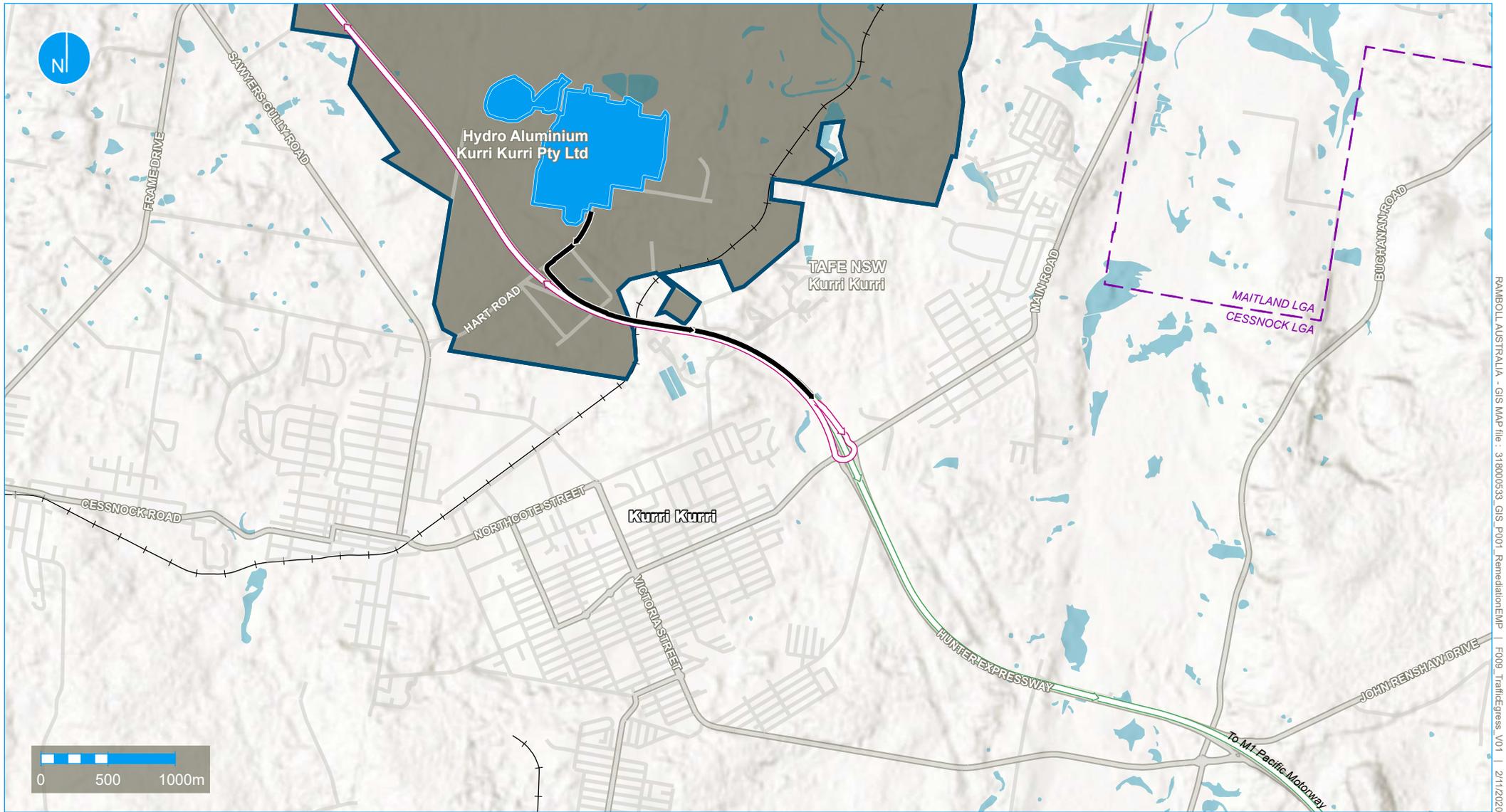


RAMBOLL AUSTRALIA - GIS MAP file : 318000353 GIS\_P001 RemediationEWP - F008 TrafficAccess\_V01 | 2/11/2020

- Legend**
- Hydro owned land
  - Project site
  - LGA boundary
  - Railway
  - Access routes**
  - North west access
  - South east access
  - Common access



**Figure 2-1 | Haulage Traffic Routes: Access**



RAMBOLL AUSTRALIA - GIS MAP file : 318908533 GIS P001 RemediationEMP - F009 TrafficEgress\_V01 | 2/11/2020

**Legend**

- Hydro owned land
- Project site
- LGA boundary
- Railway
- Egress routes**
- North west egress
- South east egress
- Common egress

A4  
1:40,000



**Figure 2-2 | Haulage Traffic Routes: Egress**

**Table 2-4** shows the predicted LoS during activities at the Smelter (based on traffic during demolition activities). The LoS at these intersections remains at "A", with no or minimal change in the average delay for vehicles at the intersection.

**Table 2-4: Modelled Level of Service with Smelter Traffic**

Intersections	Intersection Control	AM Peak		PM Peak	
		Average Delay (seconds)	LoS	Average Delay (seconds)	LoS
Hart Road/Off Ramp	Give Way/ Yield	10.6	A	14.1	A
Hart Road/On-Ramp	Give Way/ Yield	10.9	A	10.7	A
Kurri Kurri interchange	Give Way/ Yield	9.4	A	9.4	A

## 3. IMPLEMENTATION

### 3.1 Roles and Responsibilities

Key personnel responsible for implementation of this TMP are in **Table 3-1** and consistent with the overall RWEMP.

**Table 3-1: TMP Implementation Responsibilities**

Position	Responsibilities
<b>OVERALL SITE MANAGEMENT</b>	
Managing Director	<p>Make certain that the Hydro Team and contractors are implementing this plan and associated plans and procedures; and have attained and are complying with applicable development approvals and permits.</p> <p>Provide adequate resources and funding for the implementation of this plan and associated plans and procedures.</p> <p>Review and approve TMP.</p>
Principal Environmental Consultant	<p>Provide advice on and assistance in implementation, monitoring and auditing of the TMP.</p> <p>Review and modify the TMP as directed by the Managing Director and/or Project Manager.</p>
Principal Communications Consultant	<p>Manage the mechanisms available for the community to receive information and to make enquiries or complaints about activities.</p>
<b>SMELTER DECOMMISSIONING, DEMOLITION AND REMEDIATION ACTIVITIES</b>	
Project Manager	<p>Review and approve the TMP on an annual basis or when changes to activities at the Smelter occur.</p> <p>Facilitate implementation of the TMP</p>
Construction Manager	<p>Verify that the work of contractors and Hydro personnel on the Project are undertaken in accordance with this TMP and relevant procedures and standards.</p> <p>Review and approve the contractors' environmental management documentation (including traffic management) prior to commencement of activities and inform contractors of changes to the TMP.</p>
Contract Administrator	<p>Provide relevant legislative, regulatory and management requirements in tender documentation.</p> <p>Verify that the work of contractors is undertaken in accordance with this TMP.</p>
WHS Manager	<p>Provide Hydro personnel with the necessary tools and training to enable effective implementation of the TMP.</p> <p>Implement and maintain an induction package to be provided to all personnel working at the Smelter and Hydro Land, which will include information relevant to traffic management.</p> <p>Review and approve contractors' environmental management documentation prior to commencement of activities.</p> <p>Undertake a weekly inspection of the Project activities at the Smelter, for the duration of the Project.</p> <p>Maintain a record of personnel induction and training records.</p>
Demolition Contractor	<p>Comply with the requirements of this TMP as it applies to Smelter demolition activities.</p> <p>Implement the measures and actions as described in the RWEMP and this TMP through a Demolition EMP and TMP, with procedures that comply with this TMP.</p> <p>Develop and implement procedures for self-checking environmental management compliance with the Demolition Contractor's procedures and this TMP.</p>

Position	Responsibilities
Remediation Contractor	<p>Report potential or actual environmental incidents associated with demolition activities at the Smelter, and assist as required in the investigation, implementation of corrective actions and recording of the incident.</p> <p>Comply with the requirements of the TMP as it applies to Smelter and relevant Hydro Land remediation activities.</p> <p>Implement the measures and actions as described in the RWEMP and this TMP through a Remediation EMP and TMP, with procedures that comply with this TMP.</p> <p>Develop and implement procedures for self-checking environmental management compliance with the Remediation Contractor’s procedures and this TMP.</p> <p>Report potential or actual environmental incidents associated with remediation activities at the Smelter, and assist as required in the investigation, implementation of corrective actions and recording of the incident.</p>
<b>CARE, MAINTENANCE AND HYDRO LAND MANAGEMENT ACTIVITIES</b>	
Environmental Officer/ Hydro Land Manager	<p>Verify that the work of contractors and Hydro personnel on Hydro Land are undertaken in accordance with this TMP.</p> <p>Undertake a weekly inspection of activities on the Hydro Land that would occur for two weeks or more. This includes review of traffic management at the connection point with public roads.</p>
<b>ALL AREAS AND ACTIVITIES</b>	
Contractors	<p>Comply with the requirements of the TMP as applicable to their activities.</p> <p>Develop and implement procedures for self-checking compliance with Contractor’s procedures and this TMP.</p>
All Personnel	Implementation of the relevant measures described in this TMP applicable to their activities.

**3.2 Management Measures**

Hydro will implement several controls to manage traffic impacts that may be generated from activities at the Smelter. The traffic management measures to be implemented on Site are outlined in **Table 3-2**.

Table 3-2: Traffic Management Measures

Management Measures	Actions	Timing/ Frequency	Responsibility	Further Detail
Consultation with Cessnock City Council and Roads and Maritime Services regarding general signposting of the demolition vehicle routes with appropriate heavy vehicle and construction warning signs.	TMP submitted to Council and RMS for review and comment.	Following receiving development consent for Stage 1 Demolition.	Project Manager Principal Environmental Consultant	N/A
	TMP to be finalised to address feedback (as appropriate) from Council and RMS.	Following receiving feedback and prior to commencing Stage 1 Demolition.	Project Manager Principal Environmental Consultant	N/A
Installation of specific warning signs at Dickson Road to warn public road users of entering and exiting heavy vehicle Demolition traffic.	A Traffic Control Plan is to be prepared in consultation with Council.	Following receiving development consent for Stage 1 Demolition.	Project Manager	N/A
	Signage is to be installed as identified in the Traffic Control Plan.	Prior to demolition.	Project Manager	Demolition CEMP
Consultation with Cessnock City Council regarding general signposting and traffic management associated with the heavy vehicle movements generated by the Dickson Road South remediation.	A Traffic Control Plan is to be prepared in consultation with Council.	Following receiving development consent for Remediation.	Project Manager Remediation Contractor	Remediation Integrated Project Management Plan (IPMP) (Appendix 3)
Installation of specific warning signs on Dickson Road to warn public road users of entering and exiting heavy vehicle Remediation traffic.	Signage is to be installed as identified in the Traffic Control Plan.	Prior to remediation of Dickson Road South	Project Manager Remediation Contractor	Remediation IPMP (Appendix 3)
Access to all public roads, driveways/ access to private land, and vehicular access to infrastructure easements to be maintained.	Access is to be maintained on public roads or access to private land or easements.	Ongoing	Project Manager Environmental Officer	Demolition CEMP
	Prohibit queuing on the public road network unless otherwise approved by Council.	Prior to and during activities	Project Manager	
	Sufficient parking will be available on site during the Works so that vehicles are not required to park on public roads or spaces.	During activities	Project Manager	Demolition CEMP

Management Measures	Actions	Timing/ Frequency	Responsibility	Further Detail
Personnel required to haul materials and equipment to and/or from the Smelter would be informed of the required haulage routes.	Haulage routes provided in <b>Figure 2-1</b> would be presented in the site induction.	Prior to and during demolition	Project Manager	<b>Figure 2-1</b> Section 3.3.2 of the EMP (inductions and training)
	Map of the transport routes to be provided to the relevant site personnel and truck operators not subject to the site induction (as they are not formally entering the Smelter for work activities).	Prior to and during demolition	Project Manager	<b>Figure 2-1</b> Demolition CEMP Remediation IPMP (Appendix 3)
Management of the transportation of demolition and other materials to and from the Smelter will be undertaken to maximise vehicle loads to therefore minimise vehicle movements.	Vehicles are to be loaded to their maximum permitted capacity, with consideration to safety and environmental considerations (avoidance of materials spilling/ falling from vehicle on public roads).	Ongoing	Project Manager	CMA CEMP Remediation IPMP (Appendix 3)
Materials transported to or from the Smelter are to be must be loaded and managed to avoid the spillage of waste in accordance with Clause 70 of the <i>Protection of the Environment Operations Regulation 2014</i> .	Load management includes: <ul style="list-style-type: none"> <li>Loading of scrap metal so that no pieces can fall from the moving vehicle.</li> <li>Covering of any dirt or other materials that could potentially generate dust.</li> </ul>	Ongoing	Remediation Contractors (Truck Drivers) Demolition Contractors (Truck Drivers) Project Manager Site Security (Smelter Gate)	Demolition CEMP Remediation IPMP (Appendix 3)
	All loading and unloading of materials are carried out on-site in designated areas	Ongoing	Remediation Contractors (Truck Drivers) Demolition Contractors (Truck Drivers) Project Manager	Demolition CEMP Remediation IPMP (Appendix 3)
Consultation with the Kurri Kurri Speedway and the Kurri Kurri Junior Motorcycle Club will be undertaken to understand their planned activities and to advise of activities that could impact on events at the facilities.	In the event that out of standard hours heavy vehicle movements are proposed when events at the Speedway and/or Motorcycle Club are held (weekends) Hydro would notify in writing the Speedway and Motorcycle Club operators.	One week prior to proposed Smelter activities that could coincide with Speedway or Motorcycle Club events.	Environmental Officer	Stakeholder Engagement Plan (Appendix K of EMP)
	The Speedway and Motorcycle Club operators would be requested to advise of upcoming events. Hydro would advise writing of any activities that could impact on access to the facilities.	Two weeks prior to such activities	Environmental Officer	Stakeholder Engagement Plan (Appendix K of EMP)

Management Measures	Actions	Timing/ Frequency	Responsibility	Further Detail
<p>All oversize vehicles must observe RMS requirements including any travel restrictions on vehicles with oversized loads or oversize special purpose vehicles as outlined in <i>Additional Access Conditions for oversize and overmass heavy vehicles and loads</i> (RMS, 2017).</p>	<p>Where required, the operators of oversized vehicles must obtain specific permits from the RMS</p>	<p>Prior to entering the Smelter</p>	<p>Remediation Contractors Demolition Contractors Project Manager (to ensure Contractors possesses required permits)</p>	<p>Demolition CEMP Remediation IPMP (Appendix 3)</p>
	<p>Operators of heavy or oversize vehicles must also ensure that the travel route and travel times are approved and comply with RMS requirements.</p>	<p>Prior to entering the Smelter</p>	<p>Remediation Contractors Demolition Contractors Project Manager (to ensure Contractors possesses required approvals)</p>	<p>Demolition CEMP Remediation IPMP (Appendix 3)</p>
	<p>All vehicular movement to and from the site will be in a forward direction.</p>	<p>During activities</p>	<p>WHS Manager</p>	<p>Demolition CEMP Remediation IPMP (Appendix 3)</p>

## 4. MONITORING AND REVIEW

### 4.1 Monitoring

Traffic monitoring commitments are outlined in **Table 4-1**.

**Table 4-1: Traffic Monitoring Commitments**

Monitoring Details	Frequency	Locations	Parameters	Person/s Responsible
Audits of routes taken by heavy vehicles travelling to and from the Smelter	Random (as required if concerns raised/ complaints received about heavy vehicles)	As per concerns/ complaint	Heavy vehicles travelling on routes as shown in the Traffic Management Plan	WHS Manager

### 4.2 Reporting

All internal and external environmental reporting requirements will be undertaken in accordance with the RWEMP.

Reporting will also be undertaken in accordance with relevant legislation, guidelines and notification requirements, as outlined in **Section 1.3**.

### 4.3 Non-conformances

The need for preventative or corrective action arises from the identification of non-conformance with environmental legal requirements, Hydro environmental requirements or the potential for non-conformances to occur.

Non-conformances will be resolved and recorded in accordance with the RWEMP.

### 4.4 Complaints

Community Complaints are considered environmental incidents and are investigated and documented accordingly. This will include any complaints relating to Smelter- related traffic.

Investigations will be conducted by the Environment Officer, including provision of feedback to the complainant. Corrective actions will be documented and regularly reviewed until completion and signed off.

Handling of complaints will be undertaken in accordance with the RWEMP.

### 4.5 Review and Improvement

Continual improvement of the TMP will be achieved by the continual evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The Environmental Officer is responsible for ensuring that a regular review of the RWEMP and specialist management plans is undertaken.

Reviews will be recorded in the document control section of this plan.

## 5. REFERENCES

NSW Roads and Maritime Services. 2017. *Additional Access Conditions for oversize and overmass heavy vehicles and loads.*

NSW Roads and Traffic Authority. 2018. *Traffic Control at Work Sites Manual.*

NSW Roads and Traffic Authority. 2002. *Guide to Traffic Generating Developments.*

Ramboll Environ. 2015. *Statement of Environmental Effects - Demolition of Former Aluminium Smelter Buildings at Kurri Kurri.*

Ramboll Environ. 2016. *Environmental Impact Statement: Former Hydro Aluminium Kurri Kurri Smelter Demolition and Remediation.*

Ramboll Australia. 2018. *Environmental Impact Statement: Former Hydro Aluminium Kurri Kurri Smelter Stage 2 Demolition.*

Ramboll Australia. 2020. *Response to Submissions Report: Former Aluminium Kurri Kurri Smelter Remediation.*

## 6. LIMITATIONS

Ramboll Australia Pty Ltd prepared this report in accordance with the scope of work as outlined in our proposal to Hydro Aluminium Pty Ltd dated 20 July 2018 and in accordance with our understanding and interpretation of current regulatory standards.

Site conditions may change over time. This report is based on conditions encountered at the site at the time of the report and Ramboll Australia Pty Ltd disclaims responsibility for any changes that may have occurred after this time.

The conclusions presented in this report represent Ramboll Australia Pty Ltd's professional judgment based on information made available during the course of this assignment and are true and correct to the best of Ramboll Australia Pty Ltd's knowledge as at the date of the assessment.

Ramboll Australia Pty Ltd did not independently verify all of the written or oral information provided to Ramboll Australia Pty Ltd during the course of this investigation. While Ramboll Australia Pty Ltd has no reason to doubt the accuracy of the information provided to it, the report is complete and accurate only to the extent that the information provided to Ramboll Australia Pty Ltd was itself complete and accurate.

This report does not purport to give legal advice. This advice can only be given by qualified legal advisors.

### 6.1 User Reliance

This report has been prepared exclusively for Hydro Aluminium Pty Ltd to support a Development Application to Cessnock City Council. It may not be relied upon by any other person or entity without Ramboll Australia Pty Ltd's express written permission.