



ONE SYDNEY HARBOUR

WATER & STORMWATER MANAGEMENT SUB PLAN



Plan Revision Status

Date	Revision (in numbers)	Purpose and Summary of Amendments	Reviewed by	Approved by
05/01/2017	1	Initial draft	Brian Falls	Brian Falls
14/03/2019	2	Revised and updated to new Lendlease format	Tracey Wallbridge	Graeme Mauger
10/10/2019	3	Minor amendments	Tracey Wallbridge	Ross Trethewy
21/02/2020	10	Revised to include R1 project, remove completed projects, and use the updated Source template. Previous revisions are captured in Revision 9. Included contingency measures for flooding events.	Toby Pritchard	Sam Trickett
27/02/2020	11	Revised to include R2 project.	Toby Pritchard	Sam Trickett

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1. SCOPE OF PROJECT AND SUB PLAN

Project Details	
Scope of the Sub Plan:	This Water Resource Management Sub Plan details measures for the supply, use and disposal of different classifications of water on Lendlease Building projects. It identifies control measures to be implemented during construction to safeguard the environment, workers and the local community, and outlines compliance, monitoring and reporting requirements.
Objectives of the Sub Plan:	<ul style="list-style-type: none"> • To minimise the potential for environmental and human health impacts associated with the use of various water sources on the project. • To identify actions to conserve water and promote sustainable practices. • To protect local water resources. • To ensure compliance with legislative and statutory requirements and guidelines. • To capture and accurately report water use data.
Scope of Works:	<p>This Management Sub Plan has been prepared based on consideration of the following scope of works:</p> <p>OSH Basement (SSD 6960)</p> <ul style="list-style-type: none"> • Remainder of building piles to R4B, R5 and car park. • Construction works of the basement inclusive of piling, ground slabs, services and waterproofing. <p>Public Domain and Associated Works (SSD 7944)</p> <ul style="list-style-type: none"> • Construction works for public domain areas at Watermans Cove, including a public pier, Hickson Park, Watermans Quay, Wulugul Walk and a section of Barangaroo Avenue • Site preparation • Ground treatment, finishes and landscaping • Civil and stormwater infrastructure and utility services • Installation of furniture, fixtures, lighting and signage <p>Towers R1 (SSD 6964) & R2 (SSD 6965)</p> <ul style="list-style-type: none"> • Construction of the building and facade. • Internal fitout <p>Water is required specifically to service general construction activities and will be sourced from potable mains connected to the site via Sydney Water meters.</p>

<p>Key issues and Risks:</p>	<p>Background</p> <p>Groundwater at the site flows towards Sydney Harbour, with strong tidal influence in areas closest to the harbour.</p> <p>Construction Activities</p> <p>The One Sydney Harbour construction includes:</p> <ul style="list-style-type: none"> • Cove & Public Domain works • Basement structure and fit out • Tower structure and fit out <p>Potential Water Quality Impacts</p> <p>Construction activities have potential to adversely impact ecosystems and water quality within Darling Harbour. There is potential for minor water quality impacts during construction including, sedimentation impacts related to earthworks such as material stockpiles, stormwater works, silt and dust on site and vehicular mud tracking.</p> <p>A summary of likely construction water sources, treatment options and disposal/reuse are included in Section 4, Water Management Strategy.</p> <p>Measures to manage potential water quality impacts are described in the Mitigation Measures table below.</p>
<p>Legislation, Approvals and Guidelines</p>	<p>Global/National</p> <p>World Health Organisation Guidelines for Drinking water quality and wastewater reuse</p> <p>Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018</p> <p>Australian Drinking Water Guidelines 2011 (updated 2018)</p> <p>State</p> <p><i>Protection of the Environment Operations Act 1997 (NSW) (POEO Act)</i></p> <ul style="list-style-type: none"> • Section 120 of the Act states that it is illegal to pollute or cause or permit pollution of waters. • Under the Act, 'Water Pollution' includes introducing litter, sediment, oil, grease, wash water and debris into waters or placing such material where it is likely to be washed or blown into waters or the stormwater system or percolate into groundwater. <p><i>Protection of the Environment Operations (General) Regulation 2009</i></p> <p>The Regulation contains provisions relating to the issuing of penalty notices under the Act, the appropriate regulatory authority for certain type of activities, and notification of pollution incidents.</p> <p>Other applicable legislation are the <i>Water Act 1912</i> and <i>Water Management Act 2000</i>.</p>

	<p>Guidelines</p> <ul style="list-style-type: none"> • NSW Department of Housing/Landcom (2004) Managing Urban Stormwater: Soils and Construction (the 'Blue Book'). • DECC (2007) Storing and Handling Liquids: Environmental Protection: Participants Manual. <p>Lendlease Requirements</p> <ul style="list-style-type: none"> • GMR: 4.13 Degradation or Pollution of the Environment • GMR: 4.15 Uncontrolled Release of Stored Energy (non-electrical)) • Lendlease Building Workplace Delivery Code (WDC) Water Consumption and Efficiency <p>Approvals</p> <p>The Planning Approval conditions of approval requirements are listed in Section 6.</p>
<p>Summary of Site Controls:</p>	<p>Works must be planned and implemented in accordance with the Lendlease GMRs, the Project EHS Plan, this Sub Plan and the Lendlease Building WDC. These documents detail Lendlease's approach and commitment to pro-active and responsible site management.</p> <p>Site specific controls, monitoring, reporting and performance measurements have been identified in this Sub Plan to prevent or minimise the impacts of construction related water demand and use on the environment, workers and community.</p> <p>Site inspections, monitoring and reporting will be undertaken by Lendlease and subcontractors as detailed in the Project EHS Management Plan Part 5.0 and the following implementation table.</p>

2. IMPLEMENTATION OF THE SUB PLAN

Ref.	Mitigation Measure	Design	Constructio	Relevant Location Activity /	Relevant Approval Conditions	Responsibilit	Timing
GENERAL							
WQ1.	Store all fuels, oils and chemicals in secure bunded areas and as per <i>Dangerous Goods Storage</i> requirements where applicable. Cover all permanent bunded areas. The bund capacity is to be capable of storing 110% of the capacity of the largest tank stored (DECC, 2007).	■	■	Entire Site	General	CM / SM / EM Subcontractors	Throughout construction
WQ2.	Use temporary bunds for short term periods of up to two weeks where required.		■	Entire Site	General	Subcontractors	Throughout construction
WQ3.	Provide spill kits at key construction areas, including any refuelling areas, near any permanent fuel / chemical storage areas.		■	Entire Site	General	Subcontractors	Throughout construction
WQ4.	Report any spills immediately to the Site Supervisor who in turn is to notify the EHS Manager (Environment).		■	Entire Site	General	ALL	Throughout construction
WQ5.	Report any spill likely to cause material harm to the environment immediately to EPA via the EPA Pollution Line (131 555). Report any water based spills to NSW Ports and the Harbour Master (9296 4999).		■	Entire Site	General	EM	Throughout construction
WQ6.	Implement the <i>Environmental Spill/Incident Procedure</i> in the Emergency Response Plan in the event of a land-based or water based fuel, oil or chemical spill.		■	Entire Site	Emergency Response Plan	SM / EM	Throughout construction
WQ7.	Undertake a survey of the seabed by divers at completion of the works.		■	Sydney Harbour near Public Domain and Watermans Cove works	Public Domain EIS	Subcontractors	After construction
EROSION & SEDIMENT CONTROL MEASURES							

Ref.	Mitigation Measure	Design	Constructio	Relevant Location Activity /	Relevant Approval Conditions	Responsibility	Timing
WQ8.	Locate soil stockpiles away from drainage lines to minimise sediment loading on the water treatment plant.	■	■	Spoil handling	General	Subcontractors	Throughout construction
WQ9.	Implement and maintain erosion and sedimentation controls as per the Erosion and Sediment Control Plans. Update plans to address changing site conditions and construction activity.		■	Entire Site	Basement B32 Public Domain C13	Subcontractors	Throughout construction
WQ10.	Install Drain Wardens or sumps for stormwater collection with a small berm around the surface to remove sediment before overflowing into the sump. Remove sediment build-up around these sumps as required.		■	Handstand areas	General	EM	Throughout construction
WQ11.	Ensure all vehicles leaving from excavation enclosures or dirty zones are cleaned with physical removal of dirt / mud using a pressure washer if required. Capture this water and treat at the water treatment plant.		■	Exit points from excavation zones	Basement EIS	Subcontractors	Throughout construction
WQ12.	Minimise water use by using a low volume, high pressure hose to reduce slurry volume during concrete works.		■	Watermans Cove area	General	Subcontractors	Throughout construction
WATER TREATMENT							
WQ13.	Treat water in the Water Treatment Plant as per the Water Management Strategy in Section 4, to be compared against Water Discharge Criteria in Section 5.	■	■	Water Treatment Plant	General	WTP Subcontractor	Throughout basement construction

3. MONITORING

Water quality monitoring will be undertaken in two forms, summarised below and in the following table.

Detail	Frequency	Parameters & Standards	Reporting	Responsibility
Water Treatment Plant monitoring including: <ul style="list-style-type: none"> Water quality monitoring of discharge from water treatment plant. Discharge volumes from the water treatment plant. 	Weekly during normal operation	Data will be assessed against the criteria in Section 4.	Collated sampling data.	EHS Manager (Environment) Specialist Contractor
Inspection of the construction site and stormwater discharge outlets	Weekly and after significant rainfall events	-	If areas require cleaning or maintenance, the relevant Site Manager or Foreman will be requested to undertake relevant actions.	EHS Co-ordinator Site Manager

Contingency Measures

Various contingency measures are available to manage water quality if required during the works and examples are outlined in more detail in the Emergency Response Plan.

All incidents will be managed in accordance with the Lendlease 'Source' procedures. Complaints and enquiries will be managed as per the Community and Stakeholder Engagement Strategy.

Water Treatment Plants:

- The Water Discharge Management Procedure found in Appendix 1 will be implemented.
- In the event of breaches of the WTP discharge criteria, the treatment processes will be investigated, any required actions implemented, and relevant stakeholders informed.

Flooding events

Where the site experiences a rainfall event where the existing WTP is unable to treat the volume of water and there is a risk of flooding the following will be undertaken:

- Rainwater impacted by open excavations (i.e. dirty water) will be directed through appropriate temporary treatment (e.g. baffle tank) prior to discharge to stormwater.
- Rainwater collected on hardstand areas (i.e. clean water) will be directly discharged to stormwater via appropriate sediment controls.
- Treated rainwater discharged via baffle tanks will be sampled against the discharge criteria found in Section 5

4. WATER MANAGEMENT STRATEGY

Water generated during the remaining works will consist of stormwater and surface water, and groundwater. Diversion bunding will keep external runoff separate, and clean areas will be discharged directly to stormwater drainage.

Water from the groundwater dewatering system will be captured and treated via on-site treatment. This treatment will be designed to meet the reduced flows from the basement and to target the discharge criteria outlined below in Section 5.

The following table outlines the water management strategy that being used during various construction activities.

Construction Activities	Water Source	Control Measures	Treatment Process	Outputs	Status
Basement Construction <ul style="list-style-type: none"> Structural elements Fit out Groundwater extraction – spears and pump/sump 	<ul style="list-style-type: none"> Surface water runoff Groundwater extraction (while required) 	<ul style="list-style-type: none"> Erosion and sediment controls as per ERSED Plan Water transfer tanks Appropriate water treatment 	<p>Clean surface water will be directly discharged to stormwater.</p> <p>Ground water collected will be appropriately treated, where required, based on ongoing monitoring per Section 3 of this Plan.</p>	<ul style="list-style-type: none"> Stormwater system Harbour discharge in accordance with discharge criteria 	<ul style="list-style-type: none"> Ongoing
Public Domain and Tower Construction <ul style="list-style-type: none"> Structural elements Fit out 	<ul style="list-style-type: none"> Surface water runoff 	<ul style="list-style-type: none"> Erosion and sediment controls as per ERSED Plan 	<p>Clean surface water will be directly discharged to stormwater via appropriate ERSED controls.</p>	<ul style="list-style-type: none"> Stormwater system 	<ul style="list-style-type: none"> Ongoing

5. DISCHARGE CRITERIA

Pollutant	Units of Measure	Discharge Criteria
Oil and Grease	milligrams per litre	10
pH	pH	6.5 - 8.5
TSS	milligrams per litre	50

6. PLANNING APPROVAL REQUIREMENTS

OSH BASEMENT (SSD6960)

No.	Original Ref.	Relevant Requirement	Reference
1.	B29	<p>WATER AND STORMWATER MANAGEMENT SUB-PLAN</p> <p>Prior to the issue of the relevant Construction Certificate, an updated Water and Stormwater Management Sub-Plan (WSMSP) for Barangaroo South prepared by a suitably qualified person shall be submitted to the EPA and DPI for review and submitted to the satisfaction of the Certifying Authority.</p> <p>The WSMSP must ensure that any effluents/liquid waste streams associated with the development that are directed to the site Wastewater Treatment Plant (WTP) would be sufficiently treated to ensure:</p> <p>(a) compliance with the relevant concentration limits required by EPL 13336 prior to discharge to Sydney Harbour; and/or</p> <p>(b) compliance with the relevant requirements of an executed Trade Waste Agreement with Sydney Water prior to discharge to sewer.</p> <p>The WSMSP shall include a suitable short period intensive monitoring program to characterise key pollutants in liquid waste inflows to and discharges from the WTP associated with the development to ensure this waste is treated to an acceptable level.</p> <p>The WSMSP must be consistent with and adopt all recommendations of the Stormwater Management and infrastructure Servicing Strategy prepared by Cardno (dated August 2015) in Appendix I of the EIS.</p> <p>A copy of the WSMSP must be provided to the Secretary.</p>	This plan Note EPL surrendered.
2.	D16	<p>DISPOSAL OF SEEPAGE AND RAINWATER</p> <p>Any seepage or rainwater collected on-site during construction shall be managed in accordance with the WSMSP under Condition B29.</p>	Mitigation Measures
3.	D17	<p>WATER QUALITY</p> <p>All works should be undertaken in a manner that ensures the protection of the water quality objectives and environmental values for Sydney Harbour estuarine waters in accordance with the following guideline documents: (a) NSW Water Quality Objectives; (b) Australian and New Zealand Guidelines for Fresh and Marine Water Quality (2000) for the environmental values under the ANZECC guidelines.</p>	Monitoring table
4.	D18	<p>WATER DISCHARGES</p>	Mitigation Measures

No.	Original Ref.	Relevant Requirement	Reference
		The Applicant must ensure that all surface water discharges from the site comply with: (a) Section 120 of the Protection of the Environment Operations Act 1997; or (b) the discharge limits (both volume and quality) set for the development Environment Protection Licence No. 13336, unless otherwise agreed to in writing by the EPA.	Note EPL surrendered.
5.	D19	<p>CONTAMINATED AND TREATED WATER</p> <p>(1) Any effluents/liquid waste streams associated with the development that are directed to the site Wastewater Treatment Plant (WTP) are sufficiently treated to ensure:</p> <p>(a) compliance with the relevant concentration limits required by EPL 13336 prior to discharge to Sydney Harbour; and/or</p> <p>(b) compliance with the relevant requirements of an executed Trade Waste Agreement with Sydney Water prior to discharge to sewer.</p> <p>(2) No contaminated or treated site waters (surface, collected groundwater or contaminated construction waters) are permitted to be discharged into Sydney Harbour unless in accordance with the conditions attached to Environmental Protection Licence No. 13336, unless otherwise agreed to in writing by the EPA.</p> <p>(3) No contaminated or treated site waters (surface, collected groundwater or contaminated construction waters) are permitted to be discharged to sewer unless in accordance with the conditions of an executed Trade Waste Agreement with Sydney Water Corporation.</p>	<p>Mitigation Measures</p> <p>Note EPL surrendered.</p> <p>Note that discharge to sewer will not be used.</p>
6.	D20	<p>BUNDING</p> <p>Store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, EPL requirements and/or EPA's Storing and Handling Liquids: Environmental Protection Participants Handbook.</p>	<p>Mitigation Measures</p> <p>Note EPL surrendered.</p>

PUBLIC DOMAIN AND WATERMANS COVE (SSD7944)

No.	Original Ref.	Relevant Requirement	Reference
7.	C12	<p>MARINE WATER QUALITY</p> <p>Prior to the commencement of works, the Water and Stormwater Management Plan required under Condition C17 of this consent must be updated to incorporate all mitigation measures outlined Seawalls and Over-Water Structures Impact Assessment (dated 24 January 2017) prepared by Royal Haskoning DHV in Appendix Q of the EIS and the Marine Ecology</p>	<p>EIS Mitigation measures</p> <p>Mitigation measures</p>

No.	Original Ref.	Relevant Requirement	Reference
		Impact Assessment (dated 7 November 2017) prepared by Royal Haskoning DHV in Appendix S of the RTS. Details demonstrating compliance with the condition must be submitted to the PCA, prior to the commencement of works.	
8.	C13	EROSION AND SEDIMENT CONTROL Soil erosion and sediment control measures shall be designed in accordance with the document Managing Urban Stormwater— Soils & Construction Volume 1 (2004) by Landcom. Details are to be submitted to the satisfaction of the Certifying Authority prior to the commencement of works.	Erosion and Sediment Control Plan
9.	C17	WATER AND STORMWATER MANAGEMENT SUB-PLAN Prior to the issue of the commencement of works, an updated Water and Stormwater Management Sub-Plan (WSMSP) for Barangaroo South prepared by a suitably qualified person shall be submitted to the EPA and DPI for review and submitted to the satisfaction of the Certifying Authority. The WSMSP must include: a) controls to contain spills and leakages during construction; b) inspection regime for erosion and sediment controls, including regular scheduled c) inspections and inspections pre/post heavy rainfall events; and d) details of water quality monitoring regime, including monitoring frequency. A copy of the WSMSP must be provided to the Secretary and the BDA. The WSMSP must be also consistent with and adopt all recommendations of the Stormwater Management and Civil Infrastructure Report prepared by Cardno (dated 17 March 2017) in Appendix C of the EIS. A copy of the WSMSP must be provided to the Secretary.	This plan Mitigation measures
10.	D27	VEHICLE CLEANSING Prior to the commencement of work, suitable measures are to be implemented to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site. It is an offence to allow, permit or cause materials to pollute or be placed in a position from which they may pollute waters.	Mitigation measures
11.	D28	STOCKPILE MANAGEMENT The Applicant must ensure: c) suitable erosion and sediment controls are in place for stockpiles.	Mitigation measures
12.	D30	EROSION AND SEDIMENT CONTROL	This plan

No.	Original Ref.	Relevant Requirement	Reference
		All erosion and sediment control measures are to be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works has been stabilised and rehabilitated so that it no longer acts as a source of sediment.	Erosion and Sediment Control Plan
13.	D36	BUNDING The Applicant shall store all chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, EPL requirements and/or EPA's Storing and Handling Liquids: Environmental Protection — Participants Handbook.	Mitigation measures Note EPL surrendered.
14.	D37	WATER QUALITY All works should be undertaken in a manner that ensures the protection of the water quality objectives and environmental values for Sydney Harbour estuarine waters in accordance with the following guideline documents: a) NSW Water Quality Objectives; and b) The Australian and New Zealand Guidelines for Fresh and Marine Water Quality (2000) for the environmental values under the ANZECC guidelines.	Mitigation measures
15.	D38	WATER DISCHARGES The Applicant must ensure that all surface water discharges from the site comply with: a) Section 120 of the Protection of the Environment Operations Act 1997; or b) the discharge limits (both volume and quality) set for the development Environment Protection Licence No. 13336, unless otherwise agreed to in writing by the EPA.	Mitigation measures
16.	D39	DISPOSAL OF SEEPAGE AND RAINWATER Any seepage or rainwater collected on-site during construction shall be managed in accordance with the Water and Stormwater Management Sub-Plan approved under Condition C17 of this consent.	This plan Mitigation measures
17.	D40	WORKS ON WATERFRONT LANDS The Applicant must ensure all works within waterfront lands are undertaken in accordance with the Department of Industry - Water's Guidelines for Controlled Activities (2012).	This plan Erosion and Sediment Control Plan
18.	D41	CONTAMINATED AND TREATED WATER	Section 4 & 5

No.	Original Ref.	Relevant Requirement	Reference
		Any effluents/liquid waste streams associated with the development that are directed to the site Wastewater Treatment Plant (WTP) are sufficiently treated to ensure: a) compliance with the relevant concentration limits required by Environment Protection Licence No. 13336 prior to discharge to Sydney Harbour; and/or b) compliance with the relevant requirements of an executed Trade Waste Agreement with Sydney Water Corporation prior to discharge to sewer.	Discharge to sewer will not be used.
19.	D42	No contaminated or treated site waters (surface, collected groundwater or contaminated construction waters) are permitted to be discharged into Sydney Harbour unless in accordance with the conditions attached to Environmental Protection Licence No. 13336, unless otherwise agreed to in writing by the EPA.	Section 4 & 5 Note EPL surrendered.
20.	D43	No contaminated or treated site waters (surface, collected groundwater or contaminated construction waters) are permitted to be discharged to sewer unless in accordance with the conditions of an executed Trade Waste Agreement with Sydney Water Corporation.	Discharge to sewer will not be used.
21.	D44	POLLUTION OF WATERS No approval is granted to pollute waters. All water discharge from the site must meet all requirements of the Protection of the Environment Operations Act 1997.	Mitigation measures This plan

TOWERS

No.	Original Ref.	Relevant Requirement	Reference
22.	C8	WATER AND STORMWATER MANAGEMENT SUB-PLAN Prior to the commencement of works, an updated Water and Stormwater Management Sub-Plan (WSMSP) for Barangaroo South prepared by a suitably qualified person shall be submitted to the EPA and DPI for review and submitted to the satisfaction of the Certifying Authority. The WSMSP must ensure that any effluents/liquid waste streams associated with the development that are directed to the site Wastewater Treatment Plant (WTP) would be sufficiently treated to ensure:	This plan Mitigation measures

No.	Original Ref.	Relevant Requirement	Reference
		<p>(a) compliance with the relevant concentration limits required by Environment Protection Licence No. 13336 prior to discharge to Sydney Harbour; and/or</p> <p>(b) compliance with the relevant requirements of an executed Trade Waste Agreement with Sydney Water Corporation prior to discharge to sewer.</p> <p>The WSMSP shall include a suitable short period intensive monitoring program to characterise key pollutants in liquid waste inflows to and discharges from the WTP associated with the development to ensure this waste is treated to an acceptable level.</p> <p>A copy of the WSMSP must be provided to the Secretary.</p>	
23.	D4	<p>DISPOSAL OF SEEPAGE AND STORMWATER</p> <p>Any seepage or rainwater collected on-site during construction shall be managed in accordance with the Water and Stormwater Management Sub-Plan.</p>	This Plan
24.	D13	<p>VEHICLE CLEANSING</p> <p>Prior to the commencement of work, suitable measures are to be implemented to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the Site. It is an offence to allow, permit or cause materials to pollute or be placed in a position from which they may pollute waters.</p>	Erosion and Sediment Control Plan
25.	D23	<p>WATER QUALITY</p> <p>All works should be undertaken in a manner that ensures the protection of the water quality objectives and environmental values for Sydney Harbour estuarine waters in accordance with the following guideline documents:</p> <p>a) NSW Water Quality Objectives; and</p> <p>b) The Australian and New Zealand Guidelines for Fresh and Marine Water Quality (2000) for the environmental values under the ANZECC guidelines.</p>	This Plan Mitigation measures
26.	D24	<p>WATER DISCHARGES</p> <p>The Applicant must ensure that all surface water discharges from the site comply with:</p> <p>a) Section 120 of the Protection of the Environment Operations Act 1997; or</p> <p>b) the discharge limits (both volume and quality) set for the development Environment Protection Licence No. 13336, unless otherwise agreed to in writing by the EPA.</p>	This Plan Mitigation measures



APPENDIX 1: WATER DISCHARGE MANAGEMENT PROCEDURE

Water Discharge Management Procedure

Rev 8 – 07/01/2020



Workflow	Trigger	Management Actions
<p>Stage 1 – Normal Operations</p> <pre> graph TD A[Continuous FWTP Discharge] --> B[Implement Stage 1 Management Actions] B --> A </pre>	<ul style="list-style-type: none"> • Operation of the FWTP in continuous discharge mode 	<ul style="list-style-type: none"> • Standard operation of FWTP
<p>Stage 2 – Exceedance</p> <pre> graph TD A[Has Stage 2 been triggered?] -- No --> B[Implement Stage 1 Management Actions] A -- Yes --> C[Implement Stage 2 Management Actions] C --> D{Are Stage 1 controls being adequately implemented?} D -- Yes --> C D -- No --> B </pre>	<ul style="list-style-type: none"> ▪ 100th percentile discharge limit exceeded (1 event). 	<ul style="list-style-type: none"> • Notify FWTP Operator of trigger • Operator to investigate the FWTP processes and immediately implement any actions identified
<p>Stage 3 - Notification</p> <pre> graph TD A{Has Stage 3 been triggered?} -- Yes --> B[Implement Stage 3 Management Actions] A -- No --> C[Continue with relevant stage of treatment] </pre>	<ul style="list-style-type: none"> ▪ 100th percentile discharge limit exceeded (2 consecutive sampling events). 	<ul style="list-style-type: none"> • Implement Stage 1 & 2 actions. • Notify LL OSH EHS Manager • Input into Enablon