



Operational Environmental Management Plan

reDirect Recycling Pty Ltd
Resource Recovery and Recycling Facility

25 Dunheved Circuit, St Marys NSW

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Attachments

- Attachment 1: SSD-10474 Consolidated Approval & Approved Plans
- Attachment 2: Air Quality Management Plan
- Attachment 3: Stormwater Assessment
- Attachment 4: Waste Management Plan
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- Attachment 6: Surface Water Management Plan
- Attachment 7: Emergency Response Plan
- Attachment 8: Operational Traffic Management Plan
- Attachment 9: EPL 21092
- Attachment 10: Example Environmental Inspection Form

1 Introduction

1.1 Background

1.1.1 Project Approval

This Operational Environmental Management Plan (OEMP) has been prepared by Redirect Recycling Pty Ltd (reDirect) on for the operation of the Resource Recovery and Recycling Facility (the Facility) located at 25 Dunheved Circuit, St Marys NSW (the subject site).

Consent for State Significant Development 10474 (SSD-10474) was granted by the NSW Department of Planning, Industry and Environment (DPIE) on 30 September 2021. See **Attachment 1** for Conditions of Approval (COA) and Stamped Approved Plans for SSD-10474.

Approval for SSD-10474 permitted the operation of a resource recovery facility to process up to 150,000 tonnes per year of waste comprising of:

- 110,000 tonnes per annum (tpa) of wood and timber waste.
- 30,000 tpa of plasterboard.
- 10,000 tpa of metal waste.

See **Section 2** for further information relating to the final facility design approved under SSD-10474.

1.1.2 Project Description

The main waste types and materials to be accepted at the site will include:

- Wood and timber waste;
- Plasterboard; and
- Metal waste.

The recovered resources will be transferred either directly to end use markets or to other facilities or processors for value adding to achieve maximum value for the beneficial use.

This OEMP covers facility operations conducted under SSD-10474. Processing of waste material will occur within the existing building, with the majority of the processed wood waste to be transferred by trucks to the Borg Manufacturing site in Oberon to be used in the manufacture of particleboard and MDF.

No additional buildings or structures are proposed from those currently on site, with the primary physical works relating to the installation of new plant and equipment within the existing building to facilitate the proposed expansion of operations.

Facilities covered under this OEMP include:

- Two in-ground 20m weighbridges (one for in-bound vehicles, one for out-bound vehicles);
- Concrete tilt panel and metal clad warehouse building with internal floor area of approximately 3,500m² and ridge height of 11.9m;
- Office and amenities building with a floor space of 152m² and a height of 4.6m;
- External areas sealed with concrete hardstand, including 10 car parking spaces; and
- Water tanks to capture rainwater from the warehouse building and a sprinkler pump room.

See **Section 2** for a complete description of the facility.

1.2 OEMP Scope

This OEMP and attached sub-plans summarise the characteristics of the Facility, the location, operating hours, how waste will be received, sorted and recycled, including traffic management, weighbridge operations, unloading of waste and loading of recycled product for off-site recycling or further processing.

This OEMP also outlines the internal movements of waste within the Facility environment, the dust suppression and stormwater collection system in place, storage of recycled products and off-site transport of final recycled materials from the operation.

The OEMP has been developed with reference to AS/NZS ISO 14001:2016 *Environmental management systems* and has considered *Environmental Management Systems Guidelines - Risk-based licensing* (NSW EPA, 2015). The OEMP outlines the policies, systems and procedures that reDirect have committed to for protecting the environment during the operation of the Facility, while also considering how key environmental and operational issues will be managed.

In addition, implementing this OEMP will ensure that operation of the Facility will be undertaken in accordance with relevant statutory and regulatory requirements. This OEMP has also been prepared to ensure compliance with the requirements of SSD-10474 Environmental Impact Statement (EIS) and other relevant project approvals.

1.3 Policy drivers supporting the project

The NSW *Waste and Sustainable Materials Strategy 2041, Stage 1: 2021-2027* (WSMS) was published by DPIE in June 2021 and supersedes the *Waste Avoidance and Resource Recovery Strategy 2014–21*.

Two sub-plans have been released to complement the WSMS. These include:

- *NSW Plastics Action Plan* – outlining the phasing out of some plastics, the management of litter from plastic items while providing an outline for supporting innovation and research.
- *NSW Waste and Sustainable Materials Strategy* – provides a guide to future infrastructure needs, which sets out the investment pathway required for NSW to meet future demand for residual waste management and recycling.

The WSMS has been prepared with the targets outlined in **Table 1** below.

Table 1: Waste management targets under WSMS (2021).

PARAMETER	TARGETS		
5 Year Targets	Phase out problematic and unnecessary plastics by 2025	Plastic litter reduction target of 30% by 2025	-
10 Year Targets	Reduce total waste generated by 10% per person by 2030	80% average recovery rate from all waste streams by 2030	Introduce a new overall litter reduction target of 60% by 2030
Plastics	Eliminate problematic and single use plastics by 2025	Triple the plastics recycling rate by 2030	-
Organics	Halve the amount of organic waste sent to landfill by 2030	Net zero emissions from organics to landfill by 2030	-

The WSMS seeks to support investment in much-needed infrastructure, encourage innovation and improve recycling behaviour. The overall goal of the WSMS is to promote the implementation of the Circular Economy in NSW, defined as “... an economic system aimed at minimising waste and promoting the continual reuse of resources. The circular economy aims to keep products, equipment and infrastructure in use for longer, thus improving the productivity of these resources. Waste materials and energy should become input for other processes: either a component or recovered resource for another industrial process or as regenerative resources for nature (e.g. compost). This regenerative approach contrasts with the traditional linear economy, which has a ‘take, make, dispose’ model of production. strategy also seeks to facilitate the development of new markets for recycled materials and reduce litter and illegal dumping....” in the WSMS.

The circular economy is based on the following key principles:

- Design out waste and pollution.
- Keeps products and material in use.
- Regenerate natural systems.

The proposed development includes the operation of a Resource Recovery Facility. Part 2, Figure 5 (pp. 20) of the WSMS states that implementation of the current pipeline of approved Resource Recovery Facilities is essential to service NSW waste management, resource recovery and recycling requirements by 2030.

1.4 OEMP objectives

The objectives of the OEMP are to:

- Support operations of the Facility in accordance with relevant COA.
- Ensure compliance with all relevant regulatory requirements.
- Minimise the environmental impacts of the Facility during operations.
- Engage with the community to minimise complaints.
- Maintain a high level of environmental performance through on-going training and inductions.
- Ensure the commitments made in the approval’s documentation are fully implemented and/or complied with during operations.
- Ensure the environmental risks associated with the operations of the Development are effectively managed.

1.5 Facility Objectives

The key objectives of the Facility are to:

- Providing combined capacity of up to 150,000 tpa of resource recovery for wood, plasterboard and metal.
- Recycle materials that would traditionally be disposed of to landfill.

1.6 Targets

Construction and operation of the Facility will increase and expand recycling infrastructure in Western Sydney and will make an important contribution to recycling rates in support of the WSMS. Thus, the facility has adopted the recycling aim to achieve a recycling rate of 95% of all waste and a disposal rate of not more than 5% to landfill.

In addition, reDirect have a commitment to the aim of achieving the following Penrith City Council stormwater pollution reduction targets:

- Gross pollutants – 90%.
- Total suspended solids (TSS) - 85%.
- Total phosphorous (TP) – 60%.
- Total nitrogen – 45%.

To improve the performance of the stormwater treatment train, an Ocean Protect StormFilter will be installed after the Ecosol GPT. According to the MUSIC modelling presented in the EIS, the updated system will meet the requirements of Penrith City Council for pollution reduction in stormwater.

2 Development description

2.1 Site Location

The Facility is located at 25 Dunheved Circuit, St Marys, identified as Lot 143 in DP 1013185 in the Penrith Local Government Area (LGA). The Facility is located in the St Marys Industrial Estate, an industrial area zoned IN1 General Industrial and is surrounded by a mix of industrial premises. The industrial precinct also has several existing waste management and resource recovery facilities and other similar activities licensed under the Protection of the Environment Operations Act 1997 (POEO Act).

The development is surrounded by existing manufacturing, processing, and heavy industry businesses, with the nearest residential dwellings located approximately 1.3 km east and 1.3 km west of the site in the suburbs of Ropes Crossing and Werrington County respectively.

2.2 Facility Description

Consent for SSD-10474 was granted by NSW DPIE on 30 September 2021.

Table 2 provides a summary of key components of the Facility as approved under SSD-10474.

Table 2: Summary of SSD-10474

ELEMENT	SSD-10474
Use	Waste or resource management facility, specifically a resource recovery facility.
Processing Capacity	Total of up to 150,000 tonnes per annum (tpa) made up of: <ul style="list-style-type: none"> (a) 110,000 tpa of wood and timber waste. (b) 30,000 tpa of plasterboard waste. (c) 10,000 tpa of metal waste.
Site Area	Site and development footprint measures approximately 6,253 square metres (m ²).
Hours of Operation	24 hours / day during operation.
Receival / Dispatch Area	Inbound and outbound weighbridge (20 m), main administration office including staff amenities and car parking.
Processing Plant and Equipment and existing site buildings	Enclosed shed containing processing plant and equipment, including truck unloading area. Shed area, 3,455 m ² . Industrial woodchipper/shredder/grinder. Manual picking station. Turbo separator. Loaders and excavators.
Water storage and treatment	<ul style="list-style-type: none"> • Stormwater is collected in four (4) 50kL hydraulically linked on-site detention (OSD) tanks. • Warehouse roof space and all hardstand areas all drain into a Ecosol GPT 4200 gross pollutant trap prior to draining onto receiving environments. • Ecosol GPT 4200 gross pollutant trap will be located adjacent to the inbound roller door on the western boundary of the site • Above ground wheel wash will be installed in the outbound lane of the driveway to remove dust and sediment from heavy vehicles leaving the site.
Received wastes	<ul style="list-style-type: none"> • Urban and natural wood wastes (MDF off-cuts, raw wood offcuts, clean pallets, LOSP pine, engineered wood products, particleboard). • Separated timber/wood waste from waste facilities. • Plasterboard (pre-sorted) from construction sites and waste facilities. • Steel components removed from the processing of pallets
Finished products	Finished Products include: <ul style="list-style-type: none"> • Shredded wood for resource recovery.

ELEMENT	SSD-10474
	<ul style="list-style-type: none"> Processed plasterboard. Recovered ferrous and non-ferrous metals.
Traffic Generation	Up to 126 movements per day.
Workforce	Up to 10 construction jobs over three months period. Up to 10 operational jobs.

2.3 Approvals Operating on the Site

Compliance with COA for the operation of SSD-10474 are provided in **Table 3**. For consistency, administration items that may be triggered during operation of the Facility have been included in **Table 3**.

This OEMP has been prepared with reference to the following documents:

- SSD-10474 Development Consent.
- The facility Environment Protection Licence (current: EPL 21497).
- SSD-10474 EIS, including appendices and the EIS Statement of Commitments.
- Any statutory guidelines referenced within the above documents.

In addition, this OEMP has been prepared in accordance with Condition C2 and C3 of SSD-10474 Development Consent and addresses all documents stated above and, at minimum, will:

- Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development.*
- Describe the procedures that would be implemented to:*
 - keep the local community and relevant agencies informed about the operation and environmental performance of the Development;*
 - receive, handle, respond to, and record complaints;*
 - resolve any disputes that may arise;*
 - respond to any non-compliance; and*
 - respond to emergencies.*
- Include the following environmental management plans:*
 - Operational Traffic Plan (Condition B3);*
 - Waste Management (see Condition B6);*
 - Surface Water Management Plan (see Condition B15, B17);*
 - Air Quality Management Plan (see Condition B22);*
 - Operational Noise Management Plan (see Condition B29); and*
 - Emergency Response Management Plan (see Condition B37).*

This OEMP and sub-plans will be reviewed and updated accordingly when required. It is noted that updated plans will require approval from the Planning Secretary prior to use. Such updates will be triggered under Condition C5:

- Within three months of:*
 - the submission of a Compliance Report under condition;*
 - the submission of an incident report under condition;*
 - the submission of an Independent Audit under condition;*
 - the approval of any modification of the conditions of this consent; or*
 - the issue of a direction of the planning Secretary under condition A2(b) which requires a review.*

The strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review.

Figure 1 illustrates the extent of the Facility.

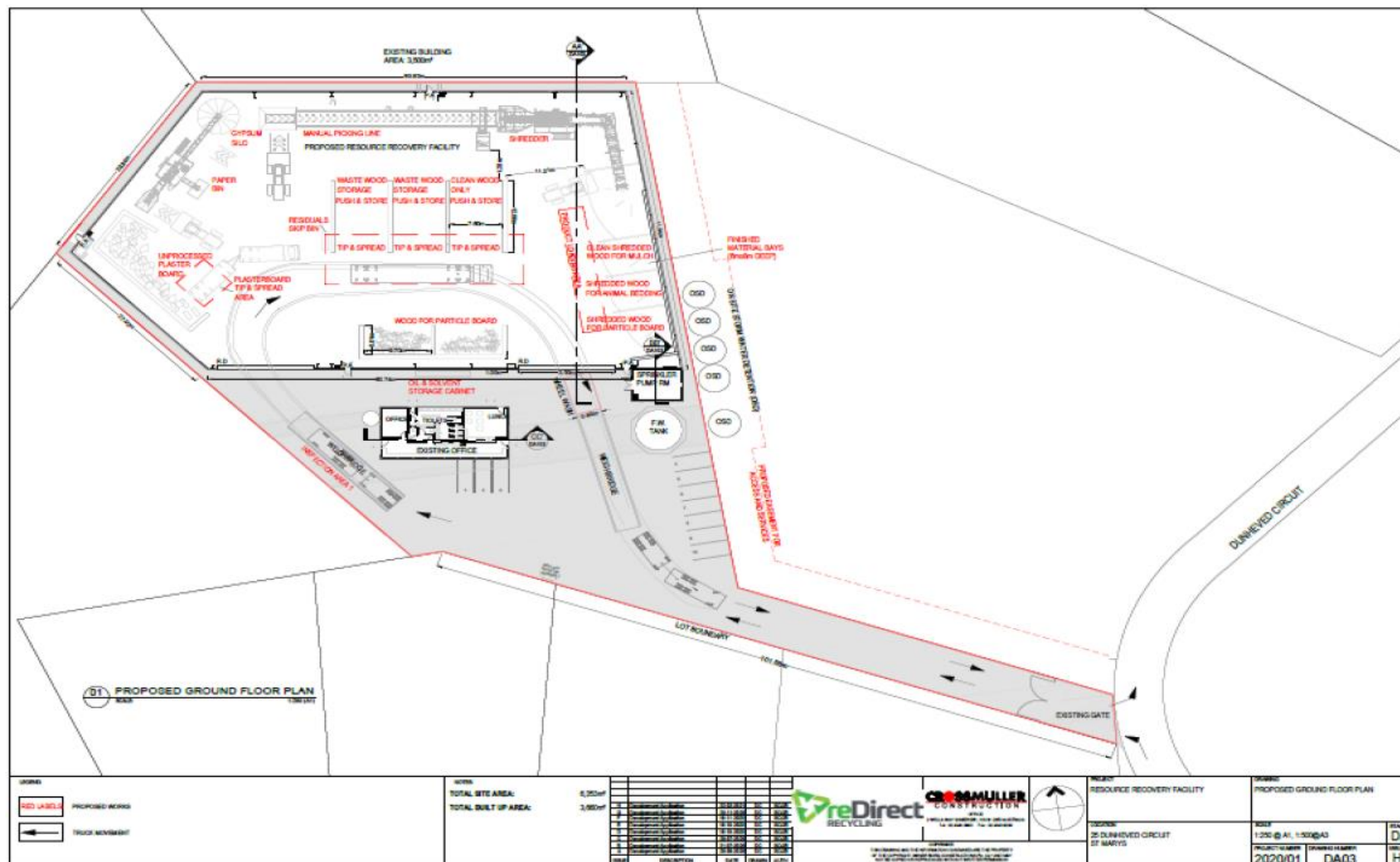


Figure 1: Extent of Facility Operating.

Table 3 Conditions Compliance under SSD -10474 Development Consent and EPL 21487.

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -10474	A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	This OEMP
SSD -10474	A2	The Development may only be carried out: <ul style="list-style-type: none"> (a) in compliance with the conditions of this consent; (b) in accordance with the directions of the Planning Secretary; (c) in accordance with the EIS and RTS and Supplementary Information; (d) in accordance with development layout plans in Appendix 1 (refer to Figure 1); and (e) in accordance with the Management and Mitigation Measures in Appendix 2. 	This OEMP
SSD -10474	A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: <ul style="list-style-type: none"> (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a). 	Section 11
SSD -10474	A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(e), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	This OEMP
SSD -10474	A5	This consent lapses five years after the date from which it operates unless the development has physically commenced on the land to which the consent applies before that date.	Not applicable
SSD -10474	A6	The Applicant must not receive or process more than 150,000 tonnes of general solid waste (non-putrescible) per year, comprising: <ul style="list-style-type: none"> (a) 110,000 tonnes per year of wood and timber waste; (b) 30,000 tonnes per year of plasterboard; and (c) 10,000 tonnes per year of metal waste. 	This OEMP
SSD -10474	A7	The Applicant must not store more than 704 tonnes of general solid waste (non-putrescible) at any one time.	This OEMP

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -10474	A8	<p>The date of commencement of each of the following phases of the development must be notified to the Department in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary:</p> <ul style="list-style-type: none"> (a) construction (b) operation; (c) cessation of operations; and (d) decommissioning 	This OEMP
SSD -10474	A9	<p>If the construction or operation or decommissioning of the development is to be staged, the Planning Secretary must be notified in writing, at least one month before the commencement of each stage (or other timeframe agreed with the Planning Secretary), of the date of commencement and the development to be carried out in that stage.</p>	Not applicable
SSD -10474	A10	<p>Within 12 months of the date of commencement of development to which this consent applies, or within another timeframe agreed by the Planning Secretary, the Applicant must surrender the following existing development consents for the site in accordance with the EP&A Regulation:</p> <ul style="list-style-type: none"> (a) DA01/1034 granted by Penrith Council on 24 July 2001; and (b) DA15/1042 granted by Penrith Council on 20 June 2016. 	Not applicable
SSD -10474	A11	<p>Upon the commencement of development to which this consent applies, and before the surrender of existing development consents or project approvals required under condition A109, the conditions of this consent prevail to the extent of any inconsistency with the conditions of those consents or approvals.</p>	Not applicable
SSD -10474	A12	<p>Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <ul style="list-style-type: none"> (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and; (b) provide details of the consultation undertaken including: <ul style="list-style-type: none"> (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved. 	This OEMP
SSD -10474	A13	<p>With the approval of the Planning Secretary, the Applicant may:</p> <ul style="list-style-type: none"> (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). 	Section 11.3

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -10474	A14	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Section Error! Reference source not found.
SSD -10474	A15	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Section 10.1 Section 11.1
SSD -10474	A16	Before the commencement of construction, the Applicant must: (a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure.	Section 5
SSD -10474	A17	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	Section 5
SSD -10474	A18	All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures (Standards Australia, 2001).	Section 5
SSD -10474	A19	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.	Not applicable
SSD -10474	A20	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Section 3.6
SSD -10474	A21	All plant and equipment used on site, or to monitor the performance of the development, must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Section 5 Section 7.3 Section 7.4
SSD -10474	A22	Within six months of the commencement of operation of the development, an easement , or an alternative arrangement as agreed by the Planning Secretary, under section 88A and/or restriction or public positive covenant under section 88E of the Conveyancing Act 1919 naming the Council as the prescribed authority, which can only be revoked, varied or modified with the consent of the Council, and which provides for access at the driveway to 21 Dunheved Circuit for vehicles entering and exiting the site must be registered on title of Lot 9 DP 31908.	Separate to OEMP
SSD -10474	A23	Within six months of the commencement of operation of the development, a boundary adjustment between the site (Lot 143 DP 1013185) and Lot 9 DP 31908, or an alternative arrangement as agreed by the Planning Secretary, is to be undertaken so that all on-site detention tanks servicing the site located on Lot 9 DP 31908, are located on the site.	Separate to OEMP

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -10474	A24	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Separate to OEMP
SSD -10474	A25	Before the commencement of operation, the Applicant must lodge a Feasibility study with Sydney Water for the development which accurately details water and wastewater demands, prepared by a Water Servicing Coordinator. Approval from Sydney Water is also required if it is proposed to discharge trade wastewater to Sydney Water's sewerage system.	Separate to OEMP
SSD -10474	A26	Before the commencement of operation of the development, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.	Separate to OEMP
SSD -10474	A27	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	This OEMP
SSD -10474	A28	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	This OEMP
SSD -10474	B1	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.	Attachment 8
SSD -10474	B2	<p>The Applicant must ensure:</p> <ul style="list-style-type: none"> (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004) and AS 2890.2:2002 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2002); (b) all car spaces are to be line marked and dedicated for the parking of vehicles only and not be used for storage of materials; (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 guidelines; (d) the site is not to be serviced or accessed by any vehicle greater than 19m in length; (e) all heavy vehicles that are 12.5 metres long or greater access the site by left-in enter and left-out exit only from the Dunheved Circuit driveway; (f) the development does not result in any vehicles queuing on the public road network; (g) heavy vehicles and bins associated with the development are not parked on local roads, footpaths, reserves, parks or vacant land in the vicinity of the site; (h) all vehicles associated with the development are prohibited from parking along Dunheved Circuit, Links Road and the surrounding road network; (i) signage, which is clearly visible from the public road, is placed within the development site to indicate entry and exit at the driveway access on Dunheved Circuit; (j) all vehicles are wholly contained on site before being required to stop; 	Section 5 Attachment 8

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<ul style="list-style-type: none"> (k) all vehicles are to enter and exit the site in a forward direction; (l) all loading and unloading of materials is carried out on-site; (m) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; (n) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; and (o) that the mitigation measures proposed in the memorandum prepared by The Transport Planning Partnership and dated 3 September 2021, included in the Supplementary Information, are installed prior to commencement of operations. 	
SSD -10474	B3	<p>Prior to the commencement of operation, the Applicant must prepare an Operational Traffic Management Plan for the development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C2 and must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s), in consultation with Council; (b) detail the numbers and frequency of vehicle movements, including light and heavy vehicles, size of heavy vehicles, routes and peak movements and internal pedestrian routes; (c) detail the measures to be implemented to ensure road safety and network efficiency throughout operation, including: <ul style="list-style-type: none"> (i) ensuring no queuing or parking of heavy vehicles occurs in Dunheved Circuit, the adjacent reserve, footpaths or the surrounding road network. (ii) redirecting incoming trucks to other facilities to prevent traffic build up and queuing in Dunheved Circuit; and (iii) ensuring there is no conflict of vehicles entering and exiting the site at the driveway entrance, including the mitigation measures proposed in the memorandum prepared by The Transport Planning Partnership and dated 3 September 2021, included in the Supplementary Information; (d) detail measures to minimise noise from development related traffic, including procedures for receiving and addressing complaints from the community about development related traffic and noise; (e) include a Driver Code of Conduct and induction training that includes procedures for: <ul style="list-style-type: none"> (i) ensuring drivers implement safe driving practices and adhere to designated routes including prioritising the use of arterial roads and avoiding residential streets; (ii) minimising road traffic noise, particularly during night-time operations; (iii) ensuring drivers adhere to site-specific speed limits. (f) include a program to monitor the effectiveness of these measures; (g) include procedures for ensuring all heavy vehicles that are 12.5 metres long or greater access the site by left-in enter and left-out exit only from the Dunheved Circuit driveway; (h) restrict access to vehicles that are over 19.0 metres long; (i) include a Traffic Control Plan (TCP) detailing the onsite measures to be implemented to control the manoeuvring of vehicles in designated areas, and the installation of signage, (j) recommend and implement additional traffic management measures where necessary, that have been developed in consultation with Council and to the satisfaction of the Planning Secretary, to maintain road safety and network efficiency throughout operation; and 	Section 5 Attachment 8

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		(k) include a Workplace Travel Plan detailing measures to promote public transport usage and describing pedestrian and bicycle linkages and end of trip facilities available on site.	
SSD -10474	B4	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence operation until the Operational Traffic Management Plan required by Condition B3 is approved by the Planning Secretary; and (b) implement the most recent version of the Operational Traffic Management Plan approved by the Planning Secretary for the duration of operation. 	Section 5 Attachment 8
SSD -10474	B5	<p>From the commencement of operation of the development, the Applicant must implement a Waste Monitoring Program for the development. The program must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; (b) include suitable provision to monitor the: <ul style="list-style-type: none"> (i) quantity, type and source of waste received on site; and (ii) quantity, type and quality of the waste outputs produced on site; and (c) ensure that: <ul style="list-style-type: none"> (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and (ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos. 	Attachment 4
SSD -10474	B6	<p>Prior to the commencement of operation of the development, the Applicant must prepare a Waste Management Plan for the development to the satisfaction of the Planning Secretary. The Waste Management Plan must form part of the OEMP and be prepared in accordance with Condition C22. The Plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with SafeWork NSW; (b) detail the type and quantity of waste to be generated during operation of the development; (c) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Environment Protection Authority, 2014); (d) describe the management of any non-conforming waste received at the site, consistent with the 'Standards for managing construction waste in NSW' (EPA, 2019); (e) describe the processes and procedures for managing asbestos received at the site; (f) detail the materials to be reused or recycled, either on or off site; and (g) include the Management and Mitigation Measures included in Appendix 2. 	Attachment 4
SSD -10474	B7	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence operation until the Waste Management Plan is approved by the Planning Secretary; (b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary. 	Attachment 4

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -10474	B8	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Section 2.7 Section 5 Attachment 4
SSD -10474	B9	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	Section 2.7 Section 5 Attachment 4
SSD -10474	B10	The Applicant must retain all sampling and waste classification data for the life of the development in accordance with the requirements of EPA.	Section 2.7 Section 5 Attachment 4
SSD -10474	B11	The Applicant must only receive waste on site that is authorised for receipt by an EPL.	Section 2.7 Section 5 Attachment 4
SSD -10474	B12	All waste must be stored wholly within the designated waste storage areas.	Section 2.7 Section 5 Attachment 4
SSD -10474	B13	All waste must be loaded and unloaded within the designated loading and unloading areas.	Section 2.7 Section 5 Attachment 4
SSD -10474	B14	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	Section 5 Attachment 6
SSD -10474	B15	<p>Prior to the commencement of operation of the development, the Applicant must design, install and operate a stormwater management system for the development. The system must:</p> <ul style="list-style-type: none"> (a) be designed by a suitably qualified and experienced person(s); (b) be in accordance with the Stormwater Management Plan Report (ref. 10113-002-smp) prepared by Eclipse Consulting Engineers Pty Ltd, dated 13 May 2021, and the Remedial Stormwater Drainage Plan (Drg No. C04-A) prepared by Consulting Engineers Pty Ltd, dated 23 February 2021. (c) be in accordance with applicable Australian Standards; and (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines. 	Section 5 Attachment 3 Attachment 6
SSD -10474	B16	Prior to the commencement of operation of the development, the existing rainwater tank on site is to be replaced or supplemented with an additional tank in order to meet Council's water conservation requirements, to the satisfaction of Council. The tank(s) are to be designed and managed in accordance with the Australian Guidelines for Water Recycling Stormwater Harvesting and Reuse, July 2009.	Not applicable to this OEMP

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -10474	B17	<p>Prior to the commencement of operation of the development, the Applicant must prepare a Surface Water Management Plan (SWMP) to the satisfaction of the Planning Secretary. The SWMP must be prepared by a suitably qualified and experienced person(s), form part of the OEMP required by Condition C22, and must include:</p> <ul style="list-style-type: none"> (a) a program to monitor surface water flows, quality, storage and use; (b) a maintenance schedule for all stormwater devices and treatment measures; (c) detail the management of wastewater streams on the site, including leachate; (d) surface water impact assessment criteria, including trigger levels for investigating potential adverse surface water impacts; and (e) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria. 	Section 5 Attachment 6
SSD -10474	B18	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence operation until the Surface Water Management Plan required by condition B1714 is approved by the Planning Secretary; and (b) implement the most recent version of the Surface Water Management Plan approved by the Planning Secretary for the duration of the development. 	Section 5 Attachment 6
SSD -10474	B19	<p>The Applicant must take all reasonable steps to prevent and minimise dust generated during all works authorised by this consent.</p>	Section 5 Attachment 2
SSD -10474	B20	<p>During operation, the Applicant must ensure:</p> <ul style="list-style-type: none"> (a) all loading, unloading, materials handling, sorting, sampling, processing and storage operations are undertaken within a fully enclosed building; (b) no waste, waste derived products and/or finished products, are stored outside of the building at any time; (c) the roller doors of the processing building are kept closed at all times, except when vehicles are entering or exiting the building; (d) a wheel wash at the vehicle egress point is operational and used at all times by trucks exiting the site; (e) all trucks entering and exiting the premises have their loads covered; (f) the following areas are sealed with concrete or asphalt: <ul style="list-style-type: none"> (i) roads and carparking areas; (ii) operating, storage, unloading and loading areas; and (iii) any unused external surfaces; (g) the site is maintained in a manner that prevents and minimises the emission of air pollutants, including dust; (h) no material, including sediment, is tracked off site; (i) vehicles and plant are switched off when not in use, fitted with pollution reduction devices where reasonably practicable and maintained in accordance with manufacturer's specifications; and (j) a dust suppression system is operational and used at all times when processing materials that create dust. 	Section 5 Attachment 2
SSD -10474	B21	<p>The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.</p>	Section 5 Attachment 2

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -10474	B22	<p>Prior to the commencement of operation of the development, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C22. The AQMP must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); operation; (b) detail and rank all emissions from all sources of the development, including particulate emissions; (c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators; (d) identify the control measures that that will be implemented for each emission source; and (e) nominate the following for each of the proposed controls: <ul style="list-style-type: none"> (i) key performance indicator; (ii) monitoring method; (iii) location, frequency and duration of monitoring; (iv) record keeping; (v) complaints register; (vi) response procedures; and (vii) compliance monitoring. 	Attachment 2
SSD -10474	B23	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence operation under this consent until the AQMP required by condition B22 is approved by the Planning Secretary; and operation; and (b) implement the most recent version of the AQMP approved by the Planning Secretary for the duration of the development. 	Attachment 2
SSD -10474	B24	The Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Section 5
SSD -10474	B25	<p>The Applicant must comply with the hours detailed in below:</p> <ul style="list-style-type: none"> (a) Construction / Fit Out <ul style="list-style-type: none"> (i) Monday – Friday 7:00 AM – 6:00 PM (ii) Saturday 8:00 AM – 1:00 PM (b) Operation <ul style="list-style-type: none"> (i) 24 Hours 	Section 2.7.3
SSD -10474	B26	<p>Works outside of the hours identified in condition B25 may be undertaken in the following circumstances:</p> <ul style="list-style-type: none"> (a) works that are inaudible at the nearest sensitive receivers; (b) works agreed to in writing by the Planning Secretary; (c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm. 	Section 2.7.3

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		Note: this condition is no longer wholly relevant as the Facility may operation 24 hours a day, 7 days a week.	
SSD -10474	B27	<p>The Applicant must ensure that noise generated by operation of the Development does not exceed the noise limits, measured in dB(A) at all residential receivers as per below:</p> <ul style="list-style-type: none"> (a) Day - LAeq(15 minute) – 49.operation; (b) Evening - LAeq(15 minute) – 43. (c) Night - LAeq(15 minute) – 38. (d) Night - LAMax(1 minute) – 52. <p>Note: Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the Noise Policy for Industry (EPA, 2017) (as may be updated or replaced from time to time). Refer to the plan in Appendix 2 for the location of residential sensitive receivers.</p>	<p>Section 5 Section 7.7</p>
SSD -10474	B28	Prior to the commencement of operation of the development, the Applicant must prepare a Driver Code of Conduct and induction training for the development to minimise road traffic noise. The Applicant must implement the Code of Conduct for the life of the development.	Attachment 8
SSD -10474	B29	<p>Prior to the commencement of the development, the Applicant must prepare an Operational Noise Management Plan (ONMP) for the development to the satisfaction of the Planning Secretary. The ONMP must form part of the OEMP required by Condition C2 and be prepared in accordance with Condition C1. The ONMP must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced noise expert; (b) describe the measures to be implemented to manage noise generating activities during operation; and (c) include a complaints management system that would be implemented for the duration of the development. 	Attachment 5
SSD -10474	B30	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence construction until the ONMP required by condition B25 is approved by the Planning Secretary; and (b) implement the most recent version of the ONMP approved by the Planning Secretary for the duration of construction. 	Attachment 5
SSD -10474	B31	<p>The Applicant must store all chemicals, fuels and oils used on-site in accordance with:</p> <ul style="list-style-type: none"> (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual' if the chemicals are liquids. 	Section 5
SSD -10474	B32	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with all relevant Australian Standards.	Section 5
SSD -10474	B33	The Applicant must store all chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual (Department of Environment and Climate Change, 2007).	Section 5

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -10474	B34	Prior to the commencement of operation of the development, the Applicant is to engage a fire safety engineer or other suitably qualified consultant to prepare the final fire safety design of the development, including firewater containment, in consultation with FRNSW to the satisfaction of the Planning Secretary and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of the National Construction Code.	Separate to this OEMP
SSD -10474	B35	The premises must have appropriate fire services to be able to respond to a fire event at the facility in accordance with FRNSW 'Fire Safety in Waste Facilities' guidelines.	Attachment 7
SSD -10474	B36	<p>Prior to commencement of operation of the development, the Applicant must prepare a Fire Safety Study (FSS) for the development to the satisfaction of the Planning Secretary. The FSS must:</p> <ul style="list-style-type: none"> (a) cover the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems (NSW HMPCC, 1994); (b) be developed in consultation with and approved by FRNSW; (c) consider the operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence. 	Separate to this OEMP
SSD -10474	B37	<p>Prior to the commencement of operation of the development, the Applicant must prepare a comprehensive Emergency Response Plan (ERP) for the site in consultation with FRNSW to the satisfaction of the Planning Secretary. The ERP must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified consultant; (b) specifically address foreseeable on-site and off-site fire events and other emergency incidents; (c) detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards); and (d) detail other risk control measures that could be implemented in a fire emergency caused by any unique hazards specific to the site. 	Attachment 7
SSD -10474	B38	<p>The Applicant must ensure the lighting associated with the development:</p> <ul style="list-style-type: none"> (a) complies with the latest version of AS 4282-1997 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. 	Section 5
SSD -10474	C1	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> (a) details of: <ul style="list-style-type: none"> (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; 	This OEMP Attached sub-plans

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<ul style="list-style-type: none"> (b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; (c) a program to monitor and report on the: <ul style="list-style-type: none"> (i) impacts and environmental performance of the development; and (ii) effectiveness of the management measures set out pursuant to paragraph (c) above; (d) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; (e) a program to investigate and implement ways to improve the environmental performance of the development over time; (f) a protocol for managing and reporting any: <ul style="list-style-type: none"> (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements; and (g) a protocol for periodic review of the plan. <p>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	
SSD -10474	C2	The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	This OEMP
SSD -10474	C3	<p>As part of the OEMP required under Condition C2 of this consent, the Applicant must include the following:</p> <ul style="list-style-type: none"> (a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (b) describe the procedures that would be implemented to: <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and (c) include the following environmental management plans: <ul style="list-style-type: none"> (i) Operational Traffic (see Condition B3); (ii) Waste (see Condition B6); (iii) Surface Water (see Condition B1715); (iv) Air Quality (see Condition B22); (v) Operational Noise (see Condition B29); and (vi) Emergency Response Plan (see Condition B37) 	This OEMP
SSD -10474	C4	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence operation until the OEMP is approved by the Planning Secretary; and 	This OEMP

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		(b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	
SSD -10474	C5	<p>Within three months of:</p> <ul style="list-style-type: none"> (a) the submission of a Compliance Report under condition; (b) the submission of an incident report under condition; (c) the submission of an Independent Audit under condition; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review, <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review.</p>	Section 11.2
SSD -10474	C6	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review required under condition C8, or such other timing as agreed by the Planning Secretary.</p> <p>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</p>	Section 11.1
SSD -10474	C7	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.	Section 6.2
SSD -10474	C8	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	Section 8.2
SSD -10474	C9	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Section 8.2
SSD -10474	C10	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Section 6.2 Section 8.2
SSD -10474	C11	<p>Within six months after the first year of commencement of operation of the development, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary), the Applicant must submit a Compliance Report to the Planning Secretary reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. Compliance Reports must be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) and must also:</p> <ul style="list-style-type: none"> (a) identify any trends in the monitoring data over the life of the development; 	Section 7.9 Section 7.13 Section 11.2

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<ul style="list-style-type: none"> (b) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (c) describe what measures will be implemented over the next year to improve the environmental performance of the development. 	
SSD -10474	C12	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Planning Secretary and notify the Planning Secretary in writing at least seven days before this is done.	Section Error! Reference source not found. Error! Reference source not found.
SSD -10474	C13	<p>Within one year of the commencement of operation of the development, and every three years after, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must:</p> <ul style="list-style-type: none"> (a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020) (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and (c) be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary). 	Section 7.11 Section 7.13
SSD -10474	C14	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must:</p> <ul style="list-style-type: none"> (a) review and respond to each Independent Audit Report prepared under condition C13 of this consent; (b) submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations; (c) implement the recommendations to the satisfaction of the Planning Secretary; and (d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done. 	Section 7.11 Section 7.11 Section 7.13
SSD -10474	C15	<p>Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing.</p> <p>Note: For the purposes of this condition, as set out in the EP&A Act, “monitoring” is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an “environmental audit” is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</p>	Section 7.9 Section 7.13
SSD -10474	C15	<p>At least 48 hours before the commencement of the development and for the life of the development (or such other time as agreed by the Planning Secretary), the Applicant must:</p> <ul style="list-style-type: none"> (a) review and respond to each Independent Audit Report prepared under condition C13 of this consent; (i) the documents referred to in condition A2 of this consent; 	Section 7.11

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<ul style="list-style-type: none"> (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; (v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint; (viii) a complaint register, updated monthly; (ix) the Compliance Report of the development; (x) audit reports prepared as part of any Independent Audit of the development and the Applicant's response to the recommendations in any audit report; (xi) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary. 	
EPL 21487	Licence information	Please see Error! Reference source not found. for information items relating to the application of EPL 21092.	Attachment 9

2.4 Land Ownership

The subject site is currently owned by BM Property Investments Pty Limited, however in this instance the sole Applicant was reDirect Recycling. Owner's consent has been obtained for the lodgement of the approved Development Applications (DAs) and supporting documentation.

Operation of the Facility will be undertaken by reDirect Recycling.

2.5 Sensitive Receivers

2.5.1 Commercial and Industrial Receivers

The site is situated within an industrial park, zoned IN1 General Industrial, surrounded by other industrial facilities, including other waste facilities.

The activities of the businesses immediately adjoining the Subject Site are summarised in **Table 4**.

Table 4 Properties in vicinity of Subject Site

NEIGHBOURING PROPERTIES			
Business	Address	Contact Number / Contact Method	Main Activity
Vacant	21 Dunheved Circuit	Not applicable	Vacant / Truck parking
Antqip Pty Ltd	19 Dunheved Circuit	(02) 9673 1233	Plant hire & civil contracting
Access Hire Sydney	84-90 Links Rd	02 9677 7200	Access and lift equipment hire and sales
Gulf Western Oil	92 Links Rd	(02) 9673 9600	Oil Refinery
Cardboard King	8 Kommer Place	(02) 9673 1660	Cardboard recycling
N&K Transmissions	1/6 Kommer Place	(02) 9833 7955	Truck and bus transmission repair
Melrose Access Hire	5 Kommer Place	(02) 9623 3329	Access and lift equipment hire and sales
Rak A Van	1 Kommer Place	1300 044 145	Access and lift equipment hire and sales

The road network surrounding the site includes Dunheved Circuit, Links Road, Ropes Crossing Boulevard, Forrester Road and Christie Street. Access to the DBP is via a sole entrance / exit at a roundabout at the junction of Forrester Road and Ropes Crossing Boulevard at the eastern side of the DBP Connection to Sydney's arterial road network, including the M4 and M7, is via Forrester Road and Glossop Street).

2.5.2 Residential Receivers

The site is situated within an industrial park, zoned IN1 General Industrial, surrounded by other industrial facilities, including other waste facilities.

The nearest residential receivers are located approximately 1.3 km to the east and 1.3 km west of the site in the suburbs of Ropes Crossing and Werrington County respectively. In the future, residents will also be located 800 m away at Jordan Springs. Current and future nearby residences are physically separated from the site by a large vegetated area surrounding Ropes Creek to the north-east, the Dunheved Golf Course bordering South/Wianamatta Creeks to the west and designated regional open space to the east.

Figure 2 illustrates the location of residential receivers in relation to the Subject Site.

Figure 2: Residential receivers' location in relation to the Subject Site



Table 5 List of noise sensitive receptors

RESIDENTIAL PROPERTIES			
Receiver ID	Land use	Address	Approx. Distance to Site
R1	Residential	21 Hartog Drive	1,290 m
R2	Residential	12 Poole Street Werrington	1,390 m
R3	Residential	66 Reid Street Werrington	1,500 m
R4	Residential	199 Forrester Road, North	1,375 m
R5	Residential	12 Townsend Crescent, Ropes Crossing	1,245 m
R6	Residential	50 Rafter Parade, Ropes	1,430 m
R7	Residential	St Marys ADI Site Central	825 m
AR1	Active Recreation (Golf Course)	118-176 Links Road, St Marys	300 m
TR1	Residential	185 Forrester Road, North St Marys	1,440 m

2.5.3 Schools

The nearest school is Ropes Crossing Public School, which is approximately 1.7km to the north-east of the site.

2.5.4 Waterway

The nearest riparian land and waterway is Ropes Creek, which is approximately 785m to the north-east of the site.

2.5.5 Biodiversity

The site has been completely cleared of vegetation. All areas are covered in either concrete hardstand or buildings.

2.6 Key contact details

Table 6 lists the key contacts for the Facility.

Table 6 Resource Recovery and Recycling Facility Contact Details.

LOCATION PERSONNEL /	CONTACT DETAILS
St Marys Resource Recovery and Recycling Facility	1300 001 306
Customer Inquiries	Wella Way Head Office 1300 001 306
Complaints and Feedbacks	Wella Way Head Office 1300 001 306

Table 7 lists the contact details for the regulatory authorities that have an interest in the operations of the Facility.

Table 7 Regulatory Authority Contact List.

REGULATORY AUTHORITY	CONTACT DETAILS
Department of Planning, and Environment (DPE) Head Office - Parramatta	Ph: 1300 420 596 (Planning) Ph: (02) 9338 6600 (Industry) Ph: 1300 361 967 (Environment, Energy and Science) info@planning.nsw.gov.au
Environment Protection Authority (EPA) Environment Line	131 555 or 02 9995 5555 info@epa.nsw.gov.au
Penrith City Council	(02) 4732 7777 council@penrith.city
SafeWork NSW Incident notification	13 10 50
Fire and Rescue NSW	St Marys Fire Station (permanently staffed): 02 9623 3897 Ropes Crossing Fire Station (retained staff): 02 9628 0661
NSW Police and / or NSW Ambulance Service	000

2.7 Site processes and operations

2.7.1 Operational features

Key operational features of the development included as part of Stage 1 of operation are listed in **Table 8**.

Table 8 Facility operational features

STRUCTURE	DESCRIPTION
Office and Amenities	An office, meeting room, lunchroom and bathroom amenities are located in the administration building at the entrance to the processing shed.
Access	All vehicles enter via a combined ingress/egress access driveway, providing a 12.5 metre (m) width at the eastern property boundary and facilitating connectivity between the off-street parking and internal heavy vehicle circulation areas.
Weighbridge (lower level)	Two inground 20 m weighbridges are installed in front of the two rollers doors providing entry and exit from the existing building.
Car parking (lower level)	Paved parking spaces, installed in accordance with relevant Australian Standards are provided.
Processing plant and equipment	An enclosed shed containing processing plant and equipment, including truck unloading area. The total area of the shed is 3,455 m ² . The facility will have a plasterboard processing area in the western portion of the site. The waste wood / timber processing area will take up most of the existing building footprint. Plant and equipment will include an industrial woodchipper / shredder / grinder, manual picking station, turbo separator, loaders and excavators.
Rainwater harvesting system (lower/mid-levels)	There is an existing 10 kL rainwater tank that collects rainwater from the roof of the office building. The catchment area is 180 m ² . Based on the rainfall estimates and assumed toilet water use, it was calculated that approximately 64.9% demand will be met by re-using the rainwater from the office building roof to flush toilets at full capacity. The shortfall will be met by the town water supply.
Stormwater system (lower/mid-levels)	The stormwater system is comprised of: <ul style="list-style-type: none"> • Rainwater tank: 10 kL rainwater tank harvesting water from the office building. • Stormwater is collected in four (4) 50kL hydraulically linked on-site detention (OSD) tanks. Stormwater from the roof of the main warehouse building and the paved areas around the site is captured in the OSD tanks, via a Ecosol GPT 4200 gross pollutant trap • An Ocean Protect StormFilter will be installed in the stormwater treatment train after the Ecosol GPT. This will ensure the pollution reduction requirements are met.

2.7.2 Operational processes – waste receipt, inspection, sorting and recycling

The key processes at the site are detailed below.

1. Weighing loads at the weighbridge and data recording

Vehicles enter via Dunheved Circuit. All vehicles transporting recyclable material to site will be required to stop at the in-bound weighbridge and be weighed. The weighbridge operator will inspect the loads for obvious contamination. Contaminated loads will be rejected and instructed to leave the site without unloading.

The weighbridge docket will contain the following information: Date; Gross, tare and net weights; Product description; Origin; Supplier (if necessary i.e. different from origin); Carrier; Truck registration; Drivers name and signature and other details as per the EPA's Benchmark Weighbridge Requirements (see Attachment 8 – Weighbridge Management Procedure). This information will be used to submit the monthly WARRP report.

Accepted vehicles are directed to the waste tipping area inside the warehouse.

2. Tipping and inspection of waste

The incoming loads of wood waste will be tipped onto the floor in designated areas in the centre of the warehouse (Tip and Spread Inspection 2 Area in **Figure 1**). The waste will be spread to 100mm thick and inspected for contaminants and other non-conforming materials. Plasterboard materials will be tipped into the designated area adjacent the western entrance to the shed (Tip and Spread Inspection 2 Area in **Figure 1**).

3. Removal of contaminants and sorting of waste

For loads with only a small amount of contaminants, the contaminants will be picked out and placed in a "residuals" skip bin for disposal off-site. Loads with large amounts of contamination will be immediately re-loaded and removed from site by the delivering vehicle. If necessary, a quarantine area has been allocated against the western wall of the warehouse for storing non-conforming waste awaiting removal from site.

Material will be sorted, by hand and by machine, into material types.

4. Processing of conforming material

Limited processing will occur. Size reduction will be performed using the excavator or shredder to facilitate efficient transport of processed materials to off-site markets (refer to **Figure 1**).

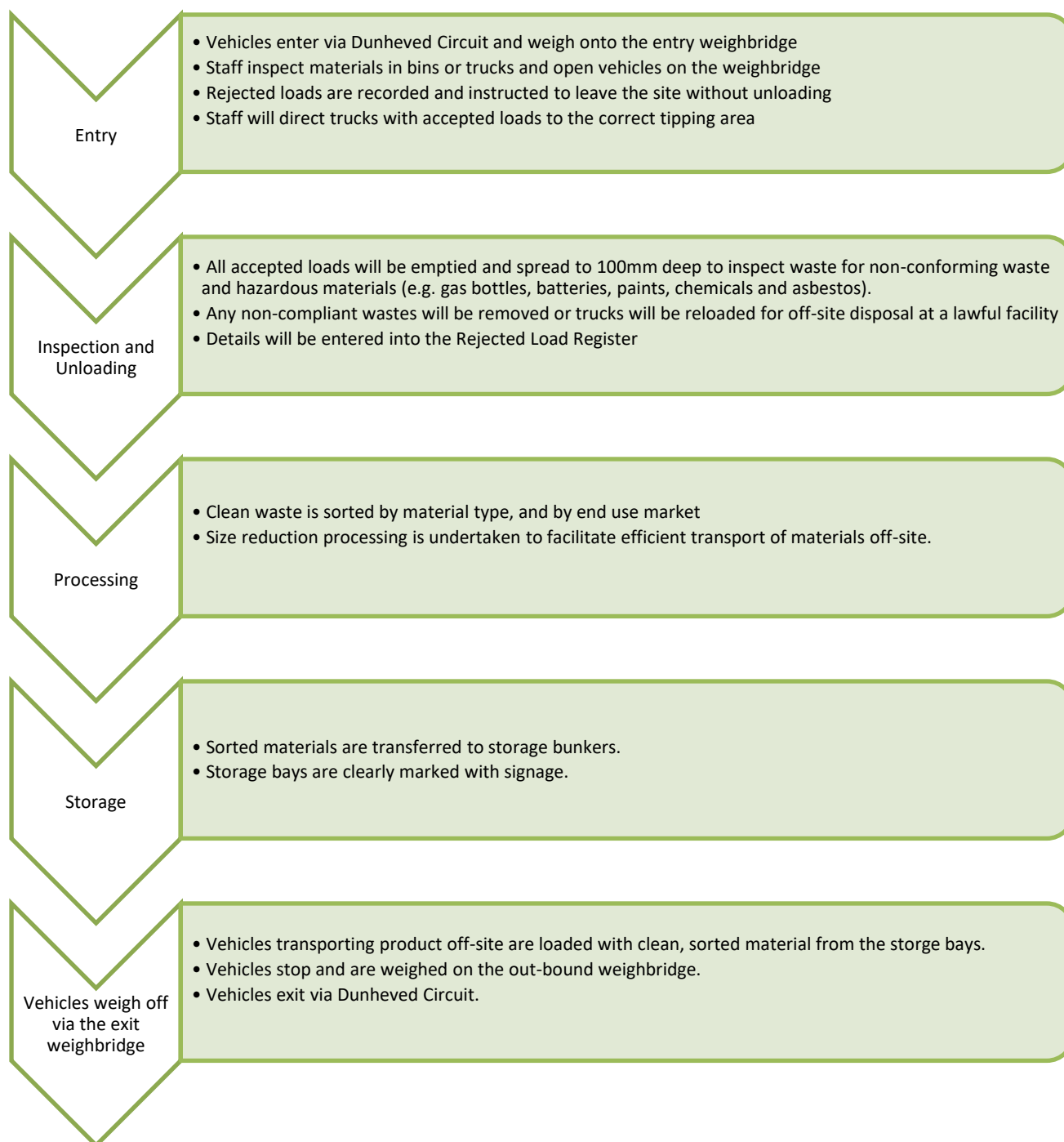
5. Storage

Clean, sorted material will be transferred to storage designated storage area along the western wall. The storage area for outgoing product is marked in **Figure 1**, along the eastern wall of the warehouse. Bays will be signposted for easy identification.

6. Loading and transfer of material off-site

Products will be loaded from the storage bays into vehicles using an excavator or front-end loader. Loaded vehicles will exit the warehouse in the forward direction via the eastern door, then exit the site via the outbound weighbridge. Vehicles are weighed on the way out. Vehicles exit the site via Dunheved Circuit in the forward direction.

Figure 3. Process flow chart for the operation of the Waste Management and Recycling Facility.



2.7.3 Operating hours

Table 9 provides the approved operational hours.

Table 9 Operational Hours as approved under SSD-7-10474

OPERATION	RECEIVAL	DISPATCH	PROCESSING
Receival, processing and loading of trucks	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours

2.7.4 Waste materials to be received

The waste materials to be accepted and recycled at the site are given below. The waste classification of each material under the NSW EPA's *Waste Classification Guidelines* (2014) is also given (**Table 10**). Estimated annual quantities of received materials are detailed in the Facility Waste Management Plan (see **Attachment 4**).

Table 10. Wastes and Raw Materials received at the Facility

RECEIVED WASTES AND RAW MATERIALS	WASTE CLASSIFICATION
Wood and timber waste	General Solid Waste (non-putrescible)
Plasterboard waste	General Solid Waste (non-putrescible)
Metal waste	General Solid Waste (non-putrescible)

2.7.5 Products transported from the facility

A summary of products for off-site transfer is provided in **Table 11** below.

Table 11 Specification of waste materials approved to be exported from the Facility

RECEIVED WASTES AND RAW MATERIALS	PROCESSING OR END USE	FINISHED PRODUCTS
Wood and timber waste	Crushing and/or shredding	Crushed / shredded wood waste sent to NSW EPA licensed facility for further processing. Recovered metals transported off-site for recycling.
Plasterboard	Plasterboard loaded via excavator into turbo separator to be processed.	Processed output materials would be transported off site to other facilities for reuse or recycling

2.7.6 Processing Capacity

In accordance with the SSD-10474 Consolidated Consent, the Facility will have a total processing capacity of 150,000 tonnes per annum (tpa), consisting of:

- 110,000 tpa of wood and timber;
- 30,000 tpa of plasterboard;
- 10,000 tpa of metal; and

2.7.7 Waste storage during operational phase

Waste held on site will be stored in concrete block bunkers around the internal perimeter of the building after it has been inspected at the #2 tip and spread waste receiving area. Contaminants extracted from the incoming waste will be stored in a land fill skip bin placed near to the waste receiving area.

The Facility WMP (see **Attachment 4**) provides a summary of the estimated amount of material to be stored on site.

Facility operations shall aim to achieve a recycling rate of 95% of all waste and a disposal rate of not more than 2.5% to landfill.

3 Environmental Management Framework

3.1 Roles and Responsibilities

All staff and contractors have an obligation to implement the requirements of this OEMP. reDirect Recycling will appoint appropriately experienced and qualified staff and contractors to undertake work in a manner that is consistent with this OEMP. Roles and responsibilities are to be reviewed and refined where required. Roles and responsibilities are detailed below in **Table 12**.

Table 12 Roles and Responsibilities

ROLE	RESPONSIBILITY
Operations Manager	<ul style="list-style-type: none"> • Ensure all works comply with relevant regulatory and Project requirements; • Ensure the requirements of this OEMP are fully implemented, and in particular, that environmental requirements are not secondary to other operational requirements; • Endorse and support the Project environmental policy; • Participate and provide guidance in the regular review of this OEMP and supporting documentation; • Provide adequate resources (personnel, financial and technological) to ensure effective development, implementation and maintenance of this OEMP; • Ensure that all personnel receive appropriate induction training, including details of the environmental and community requirements; • Ensure that complaints are investigated, and issues raised resolved; and • Stop work immediately where there is an actual or potential risk of harm to the environment.
Site Manager	<ul style="list-style-type: none"> • Overall responsibility for the management of environmental aspects of the Project; • Development, implementation, monitoring and updating of the OEMP; • Ensure regular compliance auditing is being undertaken; • Ensure site monitoring is being undertaken as per this OEMP, sub-plans and as per statutory requirements; • Emergency contact during operation; • During operation, is responsible for delegating roles onsite, such as First Aid Officers. • Ensure environmental risks of the Project are identified and appropriate mitigation measures implemented; • Identify where environmental measures are not meeting the set targets and where improvement can be achieved; • Ensure environmental management procedures and protection measures are implemented; • Ensure environmental protocols are in place and managed; • Ensure environmental compliance; • Obtain and update all environmental licences, approvals and permits as required; • Lead liaison with regulatory authorities; • Ensure all Project personnel attend an induction prior to commencing works; • Stop work immediately where there is an actual or potential risk of harm to the environment; • Manage environmental document control, reporting, inductions and training; and • Stop activities where there is actual or potential risk of harm to the environment or to prevent an environmental non-conformance.
Environmental Manager	<ul style="list-style-type: none"> • Assist in ensuring the OEMP remains relevant to current operations onsite and is updated as required. • Comply with the requirements of this OEMP; • Maintaining site records related to the implementation of this OEMP; • Undertake site inspections, carry out monitoring activities and complete reporting;

ROLE	RESPONSIBILITY
	<ul style="list-style-type: none"> Ensuring compliance with environmental legislation, regulations, permits, approvals etc; Provide copies of this OEMP to all staff and contractors; Investigating incidents and undertaking corrective or preventative actions where required; Developing and maintaining an Environmental Incident Report Register or similar; Provide environmental training to staff and contractors; Provide reports to the Operations Manager on any major issues resulting from the Project; and Stop activities where there is an actual or immediate risk of harm to the environment.
All Project Personnel including Contractors	<ul style="list-style-type: none"> Comply with the requirements of this OEMP; Attend all environmental training required; Undertake all activities in accordance with agreed procedures and work methods; Ensure that they are aware of the contact person(s) regarding environmental matters; and Follow instructions of the Operations Manager and Environmental Representative.

3.2 Communication Protocols

Communication protocols have been established for the Facility and are included in the relevant sections of this OEMP to ensure information regarding environmental issues and controls are distributed effectively amongst relevant personnel both internal and external to the Facility. The Operations Manager will be responsible for the timing and effectiveness of all communications. Communication with the community will be undertaken as required by the Operations Manager and Environmental Manager, unless communication is delegated to a suitably trained consultant and / or internal staff member by the Operations Manager.

Key Project contacts are provided in **Table 13**.

Table 13 Key Contacts

NAME	POSITION	CONTACT NUMBER
Aaron Hudson	Operations Manager	0408 408 841
Aaron Murphy	Site Manager	0410 118 474
James Sutton	Environmental Manager	0414 987 168

3.3 Conditions of Approval

The facility will be operated in accordance with this OEMP, drawn from the following documents:

- SSD-10474 Development Consent.
- The facility Environment Protection Licence (current: EPL 21497).
- SSD-10474 EIS, including appendices and the EIS Statement of Commitments.
- Any statutory guidelines referenced within the above documents.

3.4 Legal Requirements

This section applies to activities which reDirect Recycling can be held responsible and includes:

- Requirements stipulated in legislation, including regulatory requirements, codes of practice and industry standards at a National, State and Local government level.
- Requirements stipulated in corporate standards.
- Other environmental requirements as required generally.

The Management Team (see **Section 3.1**) shall also access and review appropriate sources of information and identify significant changes in legal requirements related to environmental aspects. These sources of information may include:

- Lawlex Legislation Service.
- Publications relevant to the waste industry.

- Environment Manager Magazine.
- NSW EPA news bulletins.
- Department of Planning and Environment publications.
- Direct notification by Commonwealth and State Government Departments.

Table 14 summarises legal requirements related to the Operations and environmental aspects.

Table 14 Legal Requirements.

LEGISLATION	ASSOCIATED REGULATIONS	GENERAL INTENT	RELEVANCE TO THE FACILITY
Protection of the Environment Operations Act 1997	<i>Protection of the Environment Operations (General) Regulation 2021</i> <i>Protection of the Environment Operations (Clean Air) Regulation 2021</i> <i>Protection of the Environment Operations (Noise Control) Regulation 2017</i> <i>Protection of the Environment Operations (Waste) Regulation 2014</i>	<p>One of the aims of the Protection of Environment Operations Act 1997 (POEO Act) is to reduce risks to human health and prevent the degradation of the environment by the use of mechanisms that promote the following:</p> <ul style="list-style-type: none"> • Pollution prevention and cleaner production, • The reduction to harmless levels of the discharge of substances likely to cause harm to the environment, • The elimination of harmful wastes, • The reduction in the use of materials and the re-use, recovery or recycling of materials, • The making of progressive environmental improvements, including the reduction of pollution at source, and • The monitoring and reporting of environmental quality on a regular basis. 	<p>Outlines requirements for a range of activities related to waste facilities including licensing, monitoring and reporting and Resource Recovery Orders and Exemptions</p>
Waste Avoidance and Resource Recovery Act 2001		<p>Minimise the consumption of natural resources and the final disposal of waste and achieve integrated waste and resource management planning.</p>	<p>The operation of the Facility must uphold principles of ecologically sustainable development and focus on waste minimisation and resource recovery over disposal.</p>
Environmental Planning and Assessment Act 1979	<i>Environmental Planning and Assessment Regulation 2021</i>	<p>Encourage the proper management, development and conservation of natural and artificial resources and protection of the environment.</p>	<p>The Project has been approved under Part 4 of the EP&A Act. ReDirect Recycling must comply with all aspects of the Project Approval. Any works that are not consistent with the Project Approval will require additional assessment and approval.</p>

LEGISLATION	ASSOCIATED REGULATIONS	GENERAL INTENT	RELEVANCE TO THE FACILITY
Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)		<i>The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)</i> sets out the requirements for the approval of the Commonwealth Minister for Sustainability, Environment, Water, Population and Communities for actions that may have a significant impact on matters of National Environmental Significance (NES).	The Project will not result in a significant impact on any matters of NES and, as such, does not require a referral to the Minister for the Environment and Heritage.
Contaminated Land Management Act 1997	<i>Contaminated Land Management Regulation 2013</i>	The <i>Contaminated Land Management Act 1977 (CLM Act)</i> is administered by the NSW Environment Protection Authority (EPA) and local councils. It provides a regime for investigating and, where appropriate, remediating land affected by contamination which represents a significant risk of harm to human health or the environment. The CLM Act specifies responsibilities for managing contaminated land and the role of the EPA in the assessment of contamination and the supervision of the investigation, remediation and management of contaminated sites.	The site has been subject of contamination from previous industrial use, however site remediation works have been undertaken and an EPA contaminated site audit has also been undertaken. No known contaminated areas remain on the site. An unexpected finds protocol (UFP) accompanies the project CEMP to manage unexpected finds during construction of the facility.
Fairfield Local Environmental Plan 2013		Provides the local planning and legislative framework for the development. Outlines the approval process and identify the applicable local planning controls that relate to the proposed development.	Determines the development approval process.
Work Health and Safety Act 2011	<i>Work Health and Safety Regulation 2017</i>	To secure and promote the health, safety and welfare of people at work.	The operations must provide a safe work environment.
Environmentally Hazardous Chemicals Act 1985	<i>Environmentally Hazardous Chemicals Regulation 2017</i>	Control of activities related to chemical waste.	Influences waste permissibility.
Public Health Act 2010	<i>Public Health Regulation 2012</i>	To increase the standard of health in NSW.	Outlines requirements for safe drinking water.
Water Management Act 2000	-	To protect, enhance and restore water, associated ecosystems and water quality.	Effects of the facility and waste operations must be managed.

3.5 Licences, permits, and approvals

All necessary licences, permits and approvals required for the proposed activity will be obtained and maintained as required throughout the life of the Project. An EPL has been obtained for the development (EPL 21487) and is attached as Error! Reference source not found.. Operation of the Facility will be undertaken in accordance with relevant statutory and other obligations including legislation and regulations, policies, approvals, licences and agreements. Any changes arising during operation of the Facility will be identified (see **Section 7**) and this OEMP will be updated accordingly (see **Section 11**).

3.6 Inductions and Training

reDirect Recycling management will ensure that all employees and contractors involved with the operations of the Facility are suitably inducted and trained prior to commencing any work on site. Training in relation to environmental responsibilities and implementation of this OEMP will take place initially through a site induction and then on an on-going basis through “toolbox talks” (or similar).

Additional training may be undertaken if considered necessary by reDirect Recycling management personnel.

3.6.1 General Site Induction

All personnel will undertake a compulsory site induction prior to commencing work on site. The site induction will include an environmental component which will address the following as a minimum:

- Relevant details of this OEMP including purpose and objectives.
- Overview of sub-plans to this OEMP, including specific requirements relating to personnel onsite.
- Key environmental issues.
- Environmental licences, permits and approval conditions.
- Relevant legislation.
- Environmental management requirements and responsibilities.
- Mitigation measures for the control of environmental issues.
- Environmental Incident response and reporting requirements.
- Information relating to the location of environmental constraints.
- Environmental personnel and key contacts.
- Appropriate response and management of complaints received from the public, government agencies or other stakeholders in accordance with the protocol detailed in **Section 9.3**.
- Appropriate response and management of environmental incidents in accordance with the strategy detailed in **Section 6**.

3.6.2 Works Specific Induction

The general induction is general training that incorporates the WHS requirements for the relevant position. Contractor personnel are required to undertake this WHS training. The induction training is to be delivered by the Operations Manager but may be undertaken by the Site Manager if the Operations Manager is unavailable at the time. This training will be specific to the individual role of the staff member and will require a detailed review and acceptance of these documented procedures.

The specific induction is to include but not be limited to:

- Safety and operating procedures and the correct identification of environmental hazards.
- Operation of plant and equipment.
- Identification of wastes.
- Accurate data recording.
- Emergency Response Plan as outlined in this OEMP.
- Pollution incident response management plan.

3.6.3 General Environmental Awareness

All employees and contractor personnel shall receive Environmental Awareness training. The General Environmental Awareness Training program will be included as part of the General Site Induction and / or Works Specific Induction as appropriate and shall include the following:

- The Environmental Policy.
- Sensitive environments and neighbours around their work area.
- Significant Environmental Activities.
- Site Legal and other requirements.
- OEMP non-conformance reporting requirements.

3.6.4 Tool-box Talks

All personnel will attend toolbox talks on a daily basis at pre-start meetings. Toolbox talks may include, but are not limited to the following:

- Noise and dust control.
- Erosion and sediment control.
- Water management.
- Operation hours.

- Waste management.
- Spill control.
- Environmental exclusion areas.
- Environmental incidents.
- Identification of WHS hazards and implementation of appropriate controls.
- Predicted weather and associated hazards (e.g. flooding, high winds, bushfire).

3.6.5 Training records

Records of all training will be recorded and maintained and will include information on:

- Who was trained.
- When the person was trained.
- The name of the trainer.
- A general description of the training content.

Training records for the facility will be stored on the online project management system *DataStation*. ReDirect Recycling will maintain an internal management system within the *DataStation* throughout the operation of the Facility.

3.6.6 Training Review

The ongoing competency and training requirements will be reviewed on a routine basis depending on staffing and current operations at the site. Potential triggers for a review of training methodology under this OEMP include:

- Changes in procedures.
- Modifications to SSD-7401.
- Changes in regulations.
- Equipment upgrades or changes in equipment.
- Errors or deficiencies in job performance.
- Errors in data reporting.
- Receipt of a complaint.
- Environmental incident occurrence.

3.7 Work Health, Safety and Environmental Policy

As a subsidiary of the Borg group of companies, reDirect Recycling has adopted the Borg Work Health, Safety and Environment Policy.



Work Health, Safety and Environment Policy



The Company is committed to achieving high standards for safety, health and environmental management throughout our organisation and will measure the achievement of the aims and objectives of this policy.

The Company:

- Recognises that our operations have the potential to impact both our workers and others in the community.
- Believes that every worker or visitor has a responsibility to:
 - ✓ Maintain a safe, healthy workplace
 - ✓ Promote safe working
 - ✓ Protect the environment from harm

Our core aims and objectives are:

- To promote a positive and proactive safety culture
- To identify, assess and eliminate risk. If elimination is not possible, control risks as far as is reasonably practicable.
- To comply with, and strive to exceed the requirements and targets set by existing Work Health and Safety legislation.
- To monitor, evaluate and continually improve our performance in Work, Health and Safety management to prevent injury, ill health and environmental pollution.
- To provide and maintain a safe working environment for workers and the wider community, underpinned by effective communication and consultation on Work Health and Safety matters.
- To effectively co-ordinate Work Health and Safety across all our business activities and programs
- To appropriately manage the environmental impact of the products used and produced by the business.
- To strive for a "best practice" framework for Work, Health and Safety management across the business.
- To allocate appropriate resources to ensure the effective implementation of this policy.

The aims of this policy will only be achieved through leadership, responsible management, commitment and ownership of these issues by all BORG workers and visitors.



John Borg
Company Director
February 2020



Michael Borg
Company Director
February 2020

Document Title: Work Health Safety and Environment Policy					
Approved By: WHS Manager	Date Approved: February 2020	Version: 2.0	Review Date: February 2023	Written By: WHS Department	Page: 1 of 1

4 Environmental Considerations

Key environmental aspects and associated impacts of the Facility identified during the preparation of the EIS and subsequent modification assessments that are covered by this OEMP include:

- Traffic and access.
- Air quality.
- Noise and vibration.
- Visual Amenity.
- Odour.
- Vermin and pest.
- Stormwater and flooding.
- Pollution incident.
- Fire.
- Waste.
- Heritage.

The key environmental aspects and associated impacts of the Facility are summarised in the following subsections.

4.1 Traffic and access

The *Traffic Impact Assessment* (The Transport Planning Partnership [TTPP], 2020) prepared as part of the Facility EIS found that:

- The proposed site ingress and egress points are consistent with the requirements as set out in the Council's DCP and Australian Standards.
- The proposed RRF is estimated to generate an average of 126 vehicle trips per day and 16 vehicle trips in the peak hour (site peak period).
- Comparatively, the proposed RRF will generate approximately half the amount of daily vehicle trips of the former site operation. Furthermore, the proposed RRF would generate a third less vehicle trips during the site peak period.
- The traffic impacts due to the proposed operation of a timber waste resource recovery facility have been assessed to be minor. Theoretically, the proposal would result in a reduction in peak traffic flow on the local road network in comparison with the former site and previously approved development (SSD-8200).

In accordance with Condition B3 of the SSD-10474 Development Consent, this OEMP includes an Operational Traffic Management Plan (OTMP), including a Driver Code of Conduct and a Traffic Control Plan (TCP) (see Error! Reference source not found.). These documents will be reviewed annually and following changes to site operations and activities. Traffic management documentation will assist reDirect Recycling in managing any potential adverse effects of excess heavy traffic to the site and the local community.

All reDirect Recycling staff have responsibilities in relation to traffic control which include ensuring worker safety and efficient operations, reducing environmental impacts, the safe transfer of waste/bins from trucks, and ensuring trucks move onto and off-site quickly and quietly.

4.2 Air quality

The *Air Quality Impact Assessment* (Wilkinson Murry, 2020) prepared as part of the Facility EIS found that:

- The results of the dispersion modelling indicate that dust and particulate matter concentrations due to the operation of the Resource Recovery Facility would comply with the established criteria at all sensitive receptors.
- Several measures have been identified to further reduce air quality impacts associated with the operation of the Resource recovery Facility (refer to **Table 15**):

The project site exists within an industrial precinct that is dominated by heavy industrial activities. The nature of these activities surrounding the site have the potential to also generate dust emissions.

The Facility proposes to process up to 150,000 tpa of wood/timber, plasterboard and metal within an enclosed building. The nature and extent of the handling and processing of these materials within the shed, suggests that the risk of significant dust generation associated with this waste stream is minimal.

Operational road surfaces of the development are sealed, with potential dust generating activities undertaken within the enclosed shed, the potential for significant emissions of dust associated with vehicle movements will be minimal where operational procedures are strictly followed.

An operational Air Quality and Odour Management Plan (AQOMP) for the operation of the Facility has been prepared by AED in accordance with Condition B24 of the SSD-10474 Development Consent (see **Attachment 2**). This AQOMP will be enacted for the duration of operation of the Facility.

4.3 Noise and Vibration

The *Noise Assessment* (The TTPP, 2020) prepared as part of the Facility EIS found that:

- Noise and vibration from the proposed development has been assessed against NSW Government policies in relation to operational noise and road traffic noise.
- The noise impact associated with operational activities is predicted to comply with the noise criteria at all the considered residential receivers.
- Potential noise impacts from traffic on the surrounding road network, arising from additional truck movements associated with the operation of the recycling facility are predicted to not be noticeable as increases in noise level of 1dB was predicted.

From an acoustics perspective, the proposed site is considered a good location for an operation of this nature. Compliance with development consent limits is predicted for all activities.

An Operational Noise Management Plan (AQOMP) for the operation of the Facility has been prepared by EMM Consulting in accordance with Condition B29 of the SSD-10474 Development Consent (see **Attachment 2**). This AQOMP will be enacted for the duration of operation of the Facility.

4.4 Odour

Condition B24 of the SSD-10474 Development Consent requires the Applicant must ensure the development does not cause or permit the emission of any offensive odour (as defined in the POEO Act). Based on the nature of the waste materials and operations at the Resource Recovery Facility, odour is not expected to impact any receptors.

4.5 Visual Amenity

There are no proposed changes to the existing building. There will be no visual impact caused by the increased operating capacity of the Resource Recovery Facility.

4.6 Vermin and Pests

With consideration to the following site factors, the risk of vermin and pest infestation is considered low:

- The site layout.
- All operations are conducted indoors.
- The minimal time waste material will remain on site.
- Proximity to the waterways and surrounding vegetation.
- The nature of surrounding industrial activities.

4.7 Stormwater and Flooding

The *Stormwater Management Plan* (Eclipse, 2021) was prepared as part of the EIS to investigate the properties of the existing stormwater system present at the development site and determine the remedial works required to ensure the system meets the specified performance requirements.

It is noted that some industrial processes on the site will produce dirty water. Existing measures to prevent dirty water from entering the stormwater system will remain in place under the new site use. No wet waste directly producing wastewater will be processed at the site. Excess water from dust suppression will remain inside the confines of the building and runoff is directed to internal pits connected to the stormwater system. Grading of the internal surface and bunding adjacent to doors ensures no wastewater enters the stormwater system.

All stormwater on the existing site is directed to an Ecosol GPT 4200. This trap makes use of an internal weir and physical screening to remove gross pollutants. A visual inspection of the pollutant trap indicated that its storage volume was at capacity and that maintenance is required. As the Ecosol GPT acts as effective gross pollutant removal, it is suggested that installation of a tertiary treatment system downstream of the Ecosol GPT would be effective in providing stormwater treatment. The proposed tertiary system is the Ocean Protect StormFilter, which can be installed in a 1500 mm manhole and requires 150 mm of depth between inlet and outlet pipes. 4x 690 mm PSorb StormFilter cartridges have been proposed to allow for reasonable maintenance intervals.

Additional mitigation measures will include the installation of wheel wash in the outbound lane of the driveway to remove dust and sediment from heavy vehicles leaving the site. A maintenance schedule will be established to ensure the GPT and wheel wash is cleared regularly and that the StormFilter cartridges are changed at appropriate intervals.

According to the DRAINS modelling, the post-development flows have been reduced to match the pre-development flows at a maximum in all rainfall events less frequent than the 0.5EY event. The site is located outside the mainstream and overland flooding events for the 100-year ARI events. As such, a quantitative flood impact assessment is not required.

In addition, water management onsite will be undertaken as outlined by the Facility Surface Water Management Plan (SWMP) (see Error! Reference source not found.). The SWMP has been prepared by Senversa Pty Ltd (Senvessa) to address Condition B17 of the SSD-10474 Consolidated Development Consent and will be enacted throughout the duration of operation of the Facility.

Additional monitoring of stormwater treatment devices and / or impacts will be undertaken as outlined under Section 4 of the SWMP (see **Attachment 7**), repeated in Section 7 is this OEMP.

4.8 Liquid spills

Any spills will be dealt with quickly using the on-site spill kits, in accordance with the Pollution Incident Response Plan, required as a condition of the Facility EPL.

4.9 Pollution incident

Emergencies or incidents which are considered not likely, but have the potential, to cause or threaten material harm to the environment include:

- Workplace health and safety.
- On-site spills or leaks.
- Off-site discharges.
- Hazardous materials/dangerous goods.
- Fire.
- Road incidents.

Any pollution incidents will be dealt with in accordance with the Pollution Incident Response Plan and **Section 6.2**.

4.10 Fire prevention and protection

A *Fire Safety Study* (Lethlean Fire and Environment, 2021) was prepared in accordance with the requirement outlined in *State Significant Development Assessment SSD-10474* (NSW DPIE, 2021). The facility was found to generally comply with the requirements of the *National Construction Code 2019* and the requirements of the *FRNSW Safety Guideline: Fire safety at waste facilities*.

One non-compliance with the NCC DTS provisions was found, which was the travel distances to a fire exit exceed the maximum permitted. The maximum travel distance from a point on the floor of the warehouse building (Building 1) is 56 m, which exceeds the permitted 40 m. However, as found with the FER prepared when the building was constructed, the nature of the occupants and the fire protection measures mean occupants will have sufficient time to evacuate the building. The NCC DTS provision could be met by ensuring a clear pathway is maintained under the elevated manual picking line. This would involve painting the pathway to the exit on the floor and installing bollards either side to ensure bins were not placed over the exit pathway.

Two minor non-compliances with the FRNSW Safety Guideline: Fire safety in waste facilities were found:

- At one point, the clearance between the opening of a stockpile bunker and a piece of machinery is 5 m, instead of the recommended 6 m. However, this still allows adequate access, especially as the bunker is accessible on two sides.
- The FRNSW guideline calls for sprinklers to be “hazard” category. However, AS2118.1 identifies waste facilities as OH3. A hazard category would only be required if waste was being stacked high, e.g. if bales of cardboard were being stacked 3-4 high. That is not the case in this waste facility, where the stockpiles of wood will be kept to a maximum of 4 m high, and contained within concrete bunkers. It is understood that the sprinklers installed are OH3, which is compliant with AS2118.1.

The comprehensive fire protection system, combined with operational management measures should compensate for these minor non-compliances with the guidelines.

The Fire Brigade Intervention Model prepared previously was found to be still valid, with the nearest permanent fire station being St Marys. The estimated minimum time from fire detection to the fire brigade applying water is approximately 29 minutes. Therefore, staff at the facility need to be able to evacuate all occupants quickly. The on-site fire systems would need to contain any fire at the facility for at least 30 minutes and prevent the fire spreading to neighbouring properties.

The facility has adequate water supply. The estimated fire water required to fire a serious fire at the facility can be contained on-site.

A Fire Management Procedure is designed to ensure that in the event of a fire starting, all reasonable and practicable measures are taken to minimise or prevent environmental harm, including air, water or land pollution. Control measures outlined in **Section 5** and Error! Reference source not found. are included as part of an operational fire management procedure:

An Emergency Response Plan (Condition B37 of the SSD-10474 Development Consent) has been prepared and attached to this OEMP (see Error! Reference source not found.).

4.11 Waste Management

Section 2.7.4 provides a summary of waste materials received at the Facility while **Section 2.7.5** provides an outline of materials transported from the facility. See **Attachment 4** for the Facility Waste Management Plan (WMP), prepared in accordance with Condition B12 of the SSD-10474 Development Consent. The WMP will be enacted throughout the duration of operation of the Facility.

4.12 Heritage

An *Aboriginal and Historic Heritage Desktop Due Diligence Assessment* (Archaeological Risk Assessment Service, 2020) was undertaken for SSD-10474 (refer to Appendix J of EIS) to inform this OEMP.

No known Aboriginal sites or potential Aboriginal sites were identified within the area proposed for the SSD modification as a result of this desktop assessment. No known historic heritage sites were identified within the area proposed for SSD modification as a result of this desktop assessment. Given the scale of previous historical development and land-use impacts on 25 Dunheved Circuit St Marys, most physical cultural heritage evidence has probably been removed.

The assessment of Aboriginal heritage concluded that the development is considered to have no Aboriginal or Historic heritage value potential.

5 Management Plans and Mitigation Measures

A suite of development design, best management practices and mitigation measures have been committed to minimise the potential for adverse impact on the local environment and surrounding community. The environmental mitigation and management measures relevant to the Facility are provided in **Table 15** below.

Operation of the Facility will be undertaken in accordance with this OEMP and several sub-plans, which shall be read in conjunction with this OEMP and controls / measures implemented concurrently. These sub-plans include:

- AQOMP (Air Quality and Odour Management Plan), see **Attachment 2**.
- WMP (Waste Management Plan), see **Attachment 4**.
- ONMP (Operational Noise Management Plan Plan), see **Attachment 5**
- SWMP (Surface Management Plan), see **Attachment 6**.
- ERP (Emergency Response Plan), see **Attachment 7**.
- OTMP (Operational Traffic Management Plan), see **Attachment 8**.

While direct responsibility for management measures under **Table 15** will largely fall to the Site Management, it is the responsibility of all personnel employed / contracted for the operation of the Facility to adhere to this OEMP and supporting plans both when onsite and when conducting works in relation to Facility operation.

Table 15: Management and mitigation measures to be applied to the Facility

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
General	reDirect Recycling will implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the Facility.	All Management	On-going
	Pests and vermin will be controlled on site through active monitoring and placement of baits and traps as required.	Site Management	On-going
	Fires will be extinguished promptly.	Site Management	On-going
	Adequate fire fire-fighting capacity will be maintained on site.	Operations Management	On-going
	A perimeter fence and security gates have been installed and they will be maintained and locked at all times when the site is unattended.	Site Management	On-going
	Employees and contractors will be suitably inducted and trained prior to commencing any work on site.	All Management	Inductions prior to commencing employment / contract. As needed toolbox talks.
	Contact details will be displayed on signage at the entrance to the site.	Operations Management	On-going
	Any new signage will be installed in consultation with Penrith City Council and shall comply with the State Environmental Planning Policy 64 – Advertising and Signage.	Operations Management	As required (prior to installation of new signage)
	All plant and equipment used for the Facility will be maintained in a proper and efficient condition and operated in a proper and efficient manner	Site Management	On-going
	reDirect Recycling will repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the Development	Operations Management	On-going
	All contractors and machine operators will be inducted on the environmental sensitivities of the work site(s) and relevant safeguards.	Operations Management	On-going
	All licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development.	Operations Management	On-going
	All demolition associated with the Development will be carried out in accordance with Australian Standard AS 2601:2001: <i>The Demolition of Structures</i> , or its latest version and the requirements of the <i>Work Health and Safety Regulation, 2011</i> .	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	All new buildings and structures, and any alterations or additions to existing buildings and structures will be constructed in accordance with the EIS and relevant requirements of the BCA. <i>Note: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the Development.</i>	Operations Management	On-going
	(If required) Prior to the construction of any utility works associated with the Development, reDirect Recycling will obtain relevant approvals from service providers.	Operations Management	On-going
	All plant and equipment used for the Development will be: (a) maintained in a proper and efficient condition; and (a) operated in a proper and efficient manner.	Site Management	On-going
	Unless agreed otherwise (with the relevant authority) reDirect Recycling will: (a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the Development; and (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the Development.	Operations Management	On-going
	Facility lighting shall be installed in such a manner so as to comply with the following: (a) complies with the latest version of AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting; and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	Site Management	On-going
	Sign and fence installation to occur as per approved layout.	Operations Management	On-going
	The site perimeter fence shall be maintained for the life of the development.	Operations Management	On-going
	Site security gates are to be locked when entry / exit to and from the Facility are not being monitored	Site Management	On-going
Traffic and Access	Monitoring of traffic to be done by the Site Manager and weighbridge operator at all times	Site Management	Continuous during opening hours
	All vehicles will enter and leave the site in a forward direction	Site Management	On-going
	On-site traffic limited to 10 km per hour	Site Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development will be constructed and maintained in accordance with the latest version of AS 2890.1 and AS 2890.2;	Site Management	Prior to commencement
	Signage will be maintained to ensure safe and efficient traffic flow. Waiting bays to be clearly marked.	Site Management	Prior to commencement
	The various operating areas will be clearly marked, and signage erected to direct heavy vehicles to the relevant operating areas	Site Management	Prior to commencement
	Pedestrian paths on-site will be clearly marked using on-ground delineation and / or signage at all times	Site Management	Prior to commencement
	All vehicles will turn off their engines when stationary (no idling), where practicable.	Site Management	On-going
	The Facility will not result in any vehicles parking or queuing on the public road network.	Site Management	On-going
	A spotter will be used for reversing vehicles when available.	Site Management	On-going
	Heavy vehicles and bins associated with Facility operation will not be parked on local roads or footpaths in the vicinity of the site.	Site Management	On-going
	All vehicles will be wholly contained on site before being required to stop, where practical.	Site Management	On-going
	All loading and unloading of heavy vehicles will occur inside the building	Operations Management	On-going
	The turning areas in the car park will be kept clear of any obstacles, including parked cars, at all times.	Operations Management	On-going
	With respect to minimising the number of vehicles onsite at any one time (above), material delivery and export will be scheduled to minimise periods of time with vehicle onsite to reduce risk to pedestrians.	Site Management	On-going
	Where possible heavy vehicle movements will be scheduled to avoid the morning and afternoon peak traffic periods.	Site Management	On-going
	Site haulage to be as per Traffic Management Plan (see Attachment 8).	Operations Management	On-going
	All heavy vehicles drivers inducted to the Facility shall abide by the Drivers Code of Conduct (see Attachment 8) both when onsite and when on the public road network.	Operations Management	On-going
	The Driver Code of Conduct is to be signed by individual drivers and authorised representative of reDirect Recycling.	Site Management	On-going
	Drivers must ensure that following tipping that the tailgate is locked before leaving the site.	Truck drivers	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Trucks entering and leaving the premises that are carrying loads will be covered at all times, except during loading and unloading.	Site Management	On-going
	The site is not to be serviced or accessed by any vehicle greater than 19m in length	Site Management	Prior to commencement
	Internal roadway markings and traffic signage will be erected to direct and guide site traffic movements.	Site Management	Prior to commencement
	Delineation on the access driveway will be provided in accordance with RMS' Delineation Guidelines Section 4 – Longitudinal Markings and Section 10 – Pavement Arrows.	Site Management	Prior to commencement
	Traffic control will be provided onsite and will be coordinated by the individual process area supervisors and weighbridge operator, with direct 2-way radio contact with the truck drivers. As such all trucks will be required to have a 2-way radio programmed with a dedicated site channel.	Site Management	On-going
	All process area supervisors will be required to carry portable 2-way radios to allow for constant contact with the weighbridge operator and truck drivers;	Operations Management	On-going
	The Site Manager and the process area supervisors will be responsible for overseeing the general driver behaviour, including any drivers disobeying internal traffic signage and road markings;	Site Management	On-going
	Within the site, hold lines will be established where trucks can temporarily wait to enter the relevant process area or the outgoing weighbridge.	Site Management	Prior to commencement
	Should queuing start to extend towards Dunheved Circuit, the site controller shall hold all departing vehicles at the loading points to enable clearance of the weighbridge for incoming vehicles.	Site Management	On-going
	Management of vehicles within the hold lines will be overseen by the process area supervisors and weighbridge operator.	Site Management	On-going
	The weighbridge operator will direct incoming trucks to the respective process area and a hold line when required.	Operations Management	On-going
	Process area supervisors will be responsible for advising drivers when it is safe to manoeuvre and reverse trucks for waste unloading within process buildings;	Operations Management	On-going
	When leaving the site, trucks will coordinate by 2-way radio with the weighbridge operator regarding their ability to exit the site or whether to wait at a hold line for further instruction;	Operations Management	On-going
	All drivers, as part of a site induction, will be informed of preferred haul routes to be used when hauling to and from the facility; and	Operations Management	On-going
Odour	All stormwater improvement devices will be regularly maintained and serviced to ensure that anaerobic conditions do not occur	Site Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	All general waste produced at the facility will be contained in appropriate waste receptacles and will be removed from site on a weekly basis, or more regularly as required	Site Management	On-going
	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going
Air Quality	All vehicles to comply with strict speed limit of 10 km/hr internal and external to the building	Site Management	On-going
	Dust-causing activities will be stopped when visible dust is observed leaving the site. Works will not recommence until additional mitigation measures are applied to achieve compliance or more favourable weather occurs.	Site Management	On-going
	All internal and external trafficable surfaces are to be sealed	Site Management	Prior to commencement
	All trucks entering and leaving the premises carrying loads must be covered at all times, except during loading and unloading.	Truck drivers	On-going
	Limit load sizes to ensure material is not above the level of truck sidewalls	Truck drivers	On-going
	Good dust management procedures will be implemented within the building including sweeping and moistening of paved areas, as required.	Site Management	On-going
	Good dust management procedures will be implemented outside of the building, and the general Site including sweeping to remove dust and other debris.	Site Management	On-going
	Driveways and onsite haulage paths will be regularly swept.	Site Management	On-going
	Activities with the potential to cause fugitive dust emissions will be located away from the subject site boundary wherever possible.	Site Management	On-going
	Training of all staff and personnel accessing the site in the need to minimise dust generation will occur as part of site inductions and regular tool-box talks.	Site Management	Inductions prior to commencing employment / contract. Regular / as needed toolbox talks
	All waste to be contained in appropriate storage bays	Site Management	On-going
	Regularly transport residual waste off-site to landfill.	Site Management	On-going
	Review of any complaints received relating to dust and of reports from monitoring conducted as a result will inform whether additional air quality control measures should be implemented.	Site Management	On-going
	Toolbox meetings to discuss any safety and compliance issues, including dust and odour, that have arisen since the previous meeting.	Operations Management	Monthly

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Dust on site will be visually monitored by the Site Manager and process area supervisors. Should weather forecasting indicate adverse weather conditions, activities with the potential to produce dust will be reduced or ceased until conditions become more favourable.	Site Management	On-going
	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going
	In the event that corrective action for a dust source is required, the following will be attempted (listed in order of action): <ul style="list-style-type: none"> (a) Repair the item of plant if deemed to be faulty, to ensure good working order. (b) Locate the activity behind a dust screen or enclosure. (c) Eliminate the dust source by substitution with another plant/method with lower dust emission. (d) Seek advice of an air quality specialist if a solution is not found. 	Site Management / Environmental Manager	When triggered
Greenhouse Gases	Use of building materials for walls, floors, roofs, that provide insulation and aid in reduced energy costs.	Site Management	Prior to commencement
	Integration of energy efficient glazing and shading where possible.	Site Management	Prior to commencement
	Maximisation of natural ventilation and use of inverter air conditioning systems.	Site Management	Prior to commencement
	Use of natural lighting.	Site Management	Prior to commencement
	Potential future use of photovoltaic cells and battery storage to generate power onsite.	Site Management	Potential use
	Use of light sensors to minimise lighting related electricity usage.	Operations Management	On-going
	Use of high efficiency lighting.	Operations Management	On-going
	Waste transfer vehicles to leave site with full loads to reduce the number of traffic movements and diesel consumption	Operations Management	On-going
	All vehicles/plant and machinery will be turned off when not in use and regularly serviced to ensure efficient operation.	Site Management	On-going
	Truck routes and loading capacity will be designed and optimised to reduce the distance and effort required by the vehicles.	Operations Management	On-going
Visual Amenity	The built form of Facility buildings are of a similar scale to the surrounding industrial and commercial buildings.	Operations Management	Prior to commencement

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Building materials selected will reduce colour contrast and blend any new and existing structures, as far as possible, into the surrounding landscape.	Operations Management	Prior to commencement
Noise and Vibration	All vehicles will comply with strict speed limit of 10 km/hr internal and external to the building	Site Management	On-going
	Best management practice will be implemented including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Facility.	Operations Management	On-going
	Facility operations will have regards to meteorological conditions that may exacerbate noise impacts to sensitive receivers (e.g. strong source to receiver vectors).	Operations Management	On-going
	Noise suppression equipment on plant will be maintained effectively at all times.	Site Management	On-going
	All doors and openings are to be completely closed during noisy activities wherever possible.	Site Management	On-going
	Operators will be instructed to throttle down or switch off idle plant and equipment.	Site Management	On-going
	Defective plant will not be used operationally until fully repaired.	Site Management	On-going
	Regularly assess noise emissions and relocate, modify, and/or stop operations if adverse noise impacts are expected to occur beyond the site boundary.	Operations Management	On-going
	All site vehicles owned by ReDirect Recycling will be fitted with broadband reversing alarms only.	Site Management	On-going
	Mobile plant operation will only occur inside the building and mobile plant will be fitted with broadband noise reversing alarms.	Site Management	On-going
	Noise emissions from the Facility will be in compliance with the requirements of the NSW EPA's <i>Noise Policy for Industry</i>	Operations Management	On-going
	Vibration generating equipment will be isolated on resilient mounts from any connective structures	Operations Management	On-going
	Vibration generating plant to be located, where practical, as far from neighbouring industrial buildings as possible.	Operations Management	On-going
Surface Water / Stormwater	Any activity with the potential to generate leachate will be suitably bunded, with leachate captured and disposed of at a suitably licenced facility. No leachate is to enter the stormwater system.	Site Management	On-going
	Stormwater systems will be inspected and maintained as outlined under Section 7.4	Operations Management / Maintenance Contractor	Quarterly

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Ongoing surface water monitoring will be undertaken as outlined under Section 7.6	Environmental Management	On-going
	Stormwater runoff from the site office roof top will be captured and diverted to 1 x 10 kL rainwater tank for re-use on site.	Site Management	On-going
	All processing of waste materials is taking place inside of the shed preventing surface waters from coming into contact with recovered wood, plaster or metal.	Site Management	On-going
	Stormwater runoff from the hardstand areas, rooftops and parking areas will flow into four (4) 50kL hydraulically linked on-site detention (OSD) tanks via an Ecosol GPT 4200 gross pollutant trap.	Operations Management	On-going
	No products will be stored in areas where rainwater can come into contact and generate leachate.	Site Management	On-going
	Stockpiles will be stored inside the main shed to prevent exposure to meteorological conditions and potential generation of leachate.	Site Management	On-going
	If any waste product is intended to be stored in an area where rainwater can infiltrate the stockpiles and generate leachate in the future, then a leachate management plan will be prepared subordinate to the SGWMP.	Operations Management	On-going
	Sediment and erosion controls will be implemented to mitigate migration of sediments and fines into drains and minimise potential impact on the surrounding off-site environment. General controls include those in Landcom (2004) <i>Managing Urban Stormwater: Soils and construction</i> - Volume 1, 4th edition.	Site Management	On-going
	All trafficable areas will be sealed to minimise erosion and tracking of dirt off-site.	Site Management	Prior to commencement
	Minimise dust and materials within the car park area, driveway, ramp and on Davis Road and minimising tracking from the loader via mechanical cleaning of truck wheels and tailgates prior to leaving site where practicable.	Site Management	On-going
	Clean stormwater drains and pits periodically.	Site Management	On-going
	Suitable sediment and erosion controls will be implemented during excavation works via temporary sediment fencing or similar.	Site Management	During any works that include ground disturbance capable of causing erosion.
	Minimise tracking of dust and debris from the receiving areas and processing sheds via use of wheel wash for trucks prior to leaving site.	Site Management	On-going
	Cleaning of tracked materials in the car park area, ramp, driveway and on Davis Road using street sweeper (or similar) on a regular basis and prior to rainfall events if practicable.	Site Management	On-going
	Delivery and unloading of bulk materials will be avoided during rainfall and / or strong vectors where practicable.	Site Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Maintenance of site vehicles and / or machinery will occur offsite where possible.	Site Management	On-going
	If undertaken onsite, the maintenance of site vehicles and / or machinery will be undertaken upon a sealed surface with appropriate controls (e.g. bunding, weather cover) in place.	Site Management	On-going
	All plant onsite will be fitted with spill kits, with additional spill kits to be maintained onsite within the facility and site office.	Operations Management	On-going
	Wastewater from the facility will not enter the stormwater management system.	Operations Management	On-going
	All spills will be cleaned up as soon as possible, to be managed as per the Facility Pollution Incident Response Management Plan.	Site Management	On-going
	Site structures to be regularly checked for erosion and scouring.	Operations Management / Maintenance Contractor	Monthly or after rain event
	Treatment areas and structures will be regularly checked for the build-up of litter material.	Operations Management / Maintenance Contractor	Monthly or after rain event
	Inflow areas and pit grates will be inspected and maintained to be clear of litter and debris.	Operations Management / Maintenance Contractor	Monthly or after rain event
	The sediment chamber of the GPT will be regularly checked and cleaned and any damaged covers replaced.	Operations Management / Maintenance Contractor	Monthly or after rain event
	Ensure downpipe leaf eaters, first flush devices and litter screens are unblocked and are operating correctly.	Operations Management / Maintenance Contractor	Monthly or after rain event
	Spill kits will be utilised at all process areas.	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Staff will be appropriately trained on spill containment and management.	Operations Management	On-going
	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going
	Inspect and remove any build-up of sediment, debris, litter, and vegetation within drainage system.	Operations Management / Maintenance Contractor	Monthly or after rain event
	Remove grate and inspect internal walls and base, repair where required. Remove any collected sediment, debris, litter, and vegetation. (e.g. Vacuum truck). Inspect and ensure grate is clear of sediment, debris, litter, and vegetation. Ensure flush placement of grate on refitment.	Operations Management / Maintenance Contractor	Quarterly/ after major storm
	Inspect all drainage structures as per Section 7.4.1 and the SGWMP (Error! Reference source not found.), noting any dilapidation, carry out required repairs.	Operations Management / Maintenance Contractor	Bi-annually
	Maintenance of stormwater structures will refer to manufacturer's operation and maintenance manual.	Operations Management / Maintenance Contractor	As per manufacturer's manual
Stormwater – Rainwater Tanks	Inspect first flush device to ensure correct operation. Remove accumulated litter & debris. If device is not functioning properly repair or replace.	Operations Management / Maintenance Contractor	Bi-annually
	Stormwater systems will be inspected and maintained as outlined under Section 7.4	Operations Management / Maintenance Contractor	Quarterly
	Check for evidence of access by animals, birds or insects including the presence of mosquito larvae. If present, identify access point and close. If evidence of algal growth, find and close points of light entry.	Operations Management / Maintenance Contractor	Bi-annually
	Check structural integrity of tank including roof and access covers. Any dilapidation including holes or gaps will be noted and repaired.	Operations Management /	Bi-annually

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
		Maintenance Contractor	
Flooding	Flood management and response will occur as outline under the Emergency Response Plan, (see Attachment 7).	All management	On-going
	Yearly evacuation drills will be implemented as part of ongoing training onsite.	Operations Management	Yearly
	All contractors and machine operators will be inducted on the environmental sensitivities of the work site(s) and relevant safeguards.	Operations Management	On-going
	For emergency assistance during flood events, please call the SES on 132 500.	Site Management	Triggered
Vermin and Pests	Remove and dispose off-site of any waste that has the potential to generate odour and attract pests or vermin.	Site Management	Daily
	Regularly clean waste floors, walls, and all loading areas, including mechanical sweeping of the building floor following periods of high traffic volumes.	Site Management	Daily
	All overhead structures and internal roofs are visually inspected weekly to ensure they are kept clean.	Site Management	Ongoing
	The subject site will be kept in good condition to limit harbourage for pests by ensuring grounds and gardens are kept free from excessive weeds and undergrowth.	Operations Management	On-going
	The drainage sumps and catch drains will be inspected daily and cleaned regularly to prevent providing a potential habitat for pests.	Site Management	Daily
	Litter patrols will be conducted on a routine basis to remove any windblown litter. Incorporated in the litter patrol is an inspection for the emergence of potential vector habitats.	Site Management	Triggered at discretion of Operations Management, Site Management and / or Environmental Management
	Inspection of the site by a registered pest controller will be undertaken.	Operations / Environmental Management	As needed
	If required, implement a spray and bait program as directed by the registered pest controller.	Operations Management	As needed
Biodiversity	The site is in the middle of an established industrial park. The impact to biodiversity at or near the site is negligible. All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
Hazardous Substances	<p>All chemicals, fuels and oils used on-site will be stored in accordance with:</p> <ul style="list-style-type: none"> (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's 'Storing and Handling of Liquids: Environmental Protection – Participants Handbook' if the chemicals are liquids. <p>To the more stringent version of the above.</p>	Site Management	On-going
	<p>The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.</p>	Operations Management	On-going
	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, will be stored and handled strictly in accordance with:</p> <ul style="list-style-type: none"> (a) all relevant Australian Standards; (b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA,1997). <p>In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement will be adhered to during operation.</p>	Site Management	On-going
Pollution	<p>All chemicals, fuels and oils used on site will be stored in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007</p>	Operations Management	On-going
	<p>Accidental spillage or poor management of fuels, oils, lubricants, hydraulic fluids, solvents and other chemicals during the operation of the Development will be controlled through spill management actions to prevent water quality and ecological impacts.</p>	Operations Management	On-going
	<p>Spills, leaks or other discharge of any waste(s) or other material(s) will be cleaned up as soon as practicable after it becomes known.</p>	Operations Management	On-going
	<p>Dangerous goods will be stored on site according to their respective ADG classes and compatibility.</p>	Operations Management	On-going
	<p>In the event of an incident, notification and actions in the Pollution Incident Response Management Plan are to be activated</p>	Operations Management	On-going
	<p>Pollution Incident Response Management Plan training is to be provided as part of environmental training and the plan is to be tested at least once a year.</p>	Operations Management	Training – ongoing / as needed

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
			Testing – at least once per year
Hazards and Risks	A strict no smoking policy is enforced on site when in proximity of any combustible materials. Smoking will only be permitted in clearly signposted areas	Operations Management	On-going
	Fire extinguishers will be positioned at readily accessible points, including on mobile plant, so that their use in an emergency is not restricted	Operations Management	On-going
	All equipment is to be regularly serviced in line with the manufacturer's recommendation	Operations Management	On-going
	Ensuring that the temperature of all stockpiles and windrows is monitored in accordance with established workplace procedures.	Operations Management	On-going
	In the event that a fire cannot be extinguished using water, the use of fire retardants should be considered (expert advice should be sought from Fire and Rescue NSW before taking action with retardants)	Operations Management	On-going
	Once the fire has been extinguished, affected areas should be monitored on a continual basis until materials have cooled	Operations Management	On-going
	All fire water will be contained on site	Operations Management	On-going
	All staff will be trained in the use of onsite firefighting appliances	Operations Management	On-going
	Ensuring that combustible materials are not accumulated in areas close to exhausts or engines.	Operations Management	On-going
	Stockpiles of waste materials in the designated waste storage area will be limited to 3m in height.	Operations Management	On-going
	Waste contained in hook lift bins will not exceed the rim of the bin	Operations Management	On-going
	Stockpiles of organic material such as timber and mulch will be limited to a maximum of 3m in height in the processing and blending areas.	Operations Management	On-going
	Flammable materials, such as paper, plastic, etc. to be stored in metal skip bins.	Operations Management	On-going
	Automatic fire sprinkler system in place in the event of fire, supported by an isolation valve to contain firewater on site.	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	All mobile plant and equipment will be fitted with fire extinguishers.	Operations Management	On-going
	All mobile plant and equipment will be regularly serviced to ensure they are in a safe and functioning condition	Operations Management	On-going
	An Emergency Response Plan has been prepared and implemented for the facility.	Operations Management	On-going
	All staff on site will be appropriately trained in the handling of dangerous goods.	Operations Management	On-going
	Flammable and combustible liquids will be stored in accordance with <i>AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids</i> .	Operations Management	On-going
Waste	No materials or waste (as defined by the POEO Act) generated outside the Site will be received at the Site for storage, treatment, processing or reprocessing except as expressly permitted by the EPL.	Operations Management	On-going
	The Facility will not receive or process more than 150,000 tonnes per annum (tpa), consisting of: (a) 110,000 tpa of wood and timber; (b) 30,000 tpa of plasterboard; and (c) 10,000 tpa of metal.	Operations Management	On-going
	Facility operations shall aim to achieve a recycling rate of 95% of all waste and a disposal rate of not more than 5% to landfill.	Operations Management	On-going
	Waste received at the Facility is assessed and classified in accordance with the EPA's <i>Waste Classification Guidelines</i> as in force, from time to time.	Site Management	On-going
	Management will record the amount of waste (in tonnes) received at the Subject Site on a daily basis via weighbridges in place.	Operations Management	Daily
	All waste materials removed from the site will only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Operations Management	On-going
	All waste will be: (a) stored wholly within the designated waste storage areas; and (b) loaded and unloaded within the designated loading and unloading areas.	Site Management	On-going
	Subcontractors will be informed of site waste management procedures.	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Unlawful waste(s) will not be deposited on the premises.	Site Management	On-going
	Plant and equipment will be regularly maintained.	Site Management	On-going
	Ordering will be limited to only the required quantity of materials.	Operations Management	On-going
	Materials will be segregated to maximise reuse and recycling.	Site Management	On-going
	Routine checks would be undertaken of waste sorting and storage areas for cleanliness, hygiene and OH&S issues, and contaminated waste materials.	Environmental Management	On-going
	Local commercial reuse opportunities will be investigated where reuse on-site is not practical.	Operations Management	On-going
	Separate skips and recycling bins will be provided for effective waste segregation and recycling purposes.	Site Management	On-going
	Training and awareness of the requirements of the WMP and specific waste management strategies will be undertaken.	Operations Management	On-going
	Contaminated waste will be managed, transported, and disposed of in accordance with licensing requirements.	Operations Management	On-going
	Waste removed from site will be transported and disposed of in accordance with licensing requirements.	Operations Management	On-going
	Assessment of suspicious potentially contaminated materials, hazardous materials and liquid wastes will be undertaken.	Operations Management	On-going
	Regular monitoring, inspection and reporting requirements will be undertaken and findings implemented.	Operations Management	On-going
Cultural Heritage	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going
	All works on site will cease in the event that any Aboriginal cultural object(s) or human remains are uncovered. If human remains are uncovered, work will immediately stop, with no further disturbance to the remains and NSW Police will be notified. Heritage NSW and the Aboriginal community will be contacted if the remains are suspected to be of Aboriginal origin. If other Aboriginal objects are discovered, work will be immediately stopped, with no further disturbance to the objects and notification to Heritage NSW by calling Environment Line on 131 555. Works must not resume in the designated area until the relevant written	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	consent is received from NSW Police and/or Heritage NSW. Any Aboriginal objects discovered must be registered on the Aboriginal Heritage Management Information System (AHIMS), in accordance with section 89A of the <i>National Parks and Wildlife Act 1974</i> .		
Historical Heritage	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development	Operations Management	On-going
	If during the course of development works suspected historic heritage material is uncovered, work will cease in that area immediately. Heritage NSW will be notified immediately and works will only recommence when an approved management strategy has been developed.	Operations Management	On-going
Contamination and Soils	Ongoing surface water monitoring will be undertaken as outlined under Section 7.6	Environmental Management	On-going
	Should unexpected contamination be encountered, a suitably qualified environmental consultant will be engaged to assess the conditions in accordance with a site Unexpected Finds Protocol and implement remediation activities in accordance with Australian Standard AS 4976 – 2008 <i>The Removal and Disposal of Petroleum Underground Storage Tanks</i> and WorkCover NSW, <i>Code of Practice: Storage and Handling of Dangerous Goods</i> , 2005;	Operations Management	Triggered
	Any excavated materials that are considered to be potentially contaminated will be placed within containment bins for testing, disposal, treatment, or re-use; and	Operations Management	Triggered
	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going

6 Environmental Incidents Management Strategy

An environmental incidents management strategy has been developed to ensure that any environmental incident caused by or relating to the operation of the Facility is effectively responded to, and any resulting adverse environmental and/or community impact is promptly prevented or effectively managed.

The following procedure is for general environmental incidents that have the potential to cause material harm to the environment. Smaller, minor incidents will be managed in accordance with the Facility's Environmental Emergency Response Plan (see **Attachment 7**), with relevant contacts listed in **Table 16** below.

Table 16 **Emergency Contacts**

Agency	Contact Number
NSW Police	000
NSW Ambulance Service	000
NSW Fire and Rescue	000
Safe Work NSW	131 050
NSW EPA	131 555
Ausgrid Emergency Number	131 388
Sydney Water	132 090
Fairfield City Council	(02) 9725 0222

6.1 Responsibility

reDirect Recycling's Management is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of an environmental incident.

All employees and contractors are to:

- Take immediate action to notify Site Management of any environmental incident; and
- Take immediate action (where it is safe to do so) to prevent, stop, contain and/or minimise the environmental impact of the incident.

6.2 Incident Management

Upon becoming aware of an environmental incident, reDirect Recycling's Management is to undertake the actions listed in the following subsections. To prevent injury, the below actions are only to be undertaken by personnel with suitable training in the below procedures.

6.2.1 Preventative Action

Where possible and it is safe to do so, immediate action should be taken to prevent, stop, contain and/or minimise the environmental impact of the incident. This may include:

- Making all efforts to contain all fire water at the Facility.
- Making all efforts to control air pollution from the Facility.
- Making all efforts to contain any discharge, spill or run-off from the Facility.
- Making all efforts to prevent flood water entering the Facility.
- Making the Facility secure.

In the unlikely event that a pollution incident requires the evacuation of the subject site, actions will be completed in accordance with the Pollution Incident Response Management Plan, required as a condition of the Facility EPL. All employees and contractors are informed of the location of emergency assembly areas through site inductions, signage and toolbox talks.

6.2.2 Notify

Under the provisions of the POEO Act, there is a duty to notify any incident that has caused or threatens to cause material harm to the environment, including providing all relevant information about the incident. This duty extends to the following:

- A person engaged as an employee or contractor must, immediately after becoming aware of the incident, notify the employer of the incident and all relevant information. If the employer cannot be contacted, the person is required to notify each relevant authority and provide all relevant information; and
- An employer who is notified of an incident or who otherwise becomes aware of an incident must, immediately after becoming aware of the incident, notify each relevant authority and provide all relevant information.

Under the POEO Act, the “relevant authority” means any of the following:

- The appropriate regulatory authority (refer to **Table 7**);
- If the NSW EPA is the appropriate regulatory authority - the NSW EPA;
- If the EPA is not the appropriate regulatory authority - the local authority for the area in which the pollution incident occurs (i.e. Fairfield City Council);
- NSW Health;
- SafeWork NSW; and
- Fire and Rescue NSW.

Relevant contact details are listed in **Table 7** for the regulatory authorities that have an interest in the Facility.

In accordance with Condition C7, The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventive measures. That report must be submitted to the Planning Secretary within 30 days after the incident or potential incident (See **Section 7.2.2**).

reDirect Recycling will provide written details of the incident to the EPA and any other relevant agencies within 7 days of the date on which the incident occurred.

In the event of a serious incident or emergency, it is more than likely that the Fire and Rescue NSW and/or the EPA will take control and manage the required investigation and remedial activities. Any instructions issued by these authorities must be strictly adhered to by Facility management and personnel.

6.2.3 Assistance

Where assistance is required handling the situation, the Operations Manager should be contacted.

Where the incident is reported via a government agency (i.e. Council or the EPA), the Operations Manager must be notified immediately (even if outside of normal business hours).

If adequate resources are not available and the incident threatens public health, property or the environment, it is essential that Fire and Rescue Service NSW and/or the EPA be contacted. Relevant contact details are listed in **Table 7** for the regulatory authorities that have an interest in the Facility.

6.2.4 Investigate

Undertake immediate investigative work to determine the cause of the incident.

6.2.5 Remedial Action

Undertake appropriate remedial action to address the cause of the incident and mitigate any further environmental impact. In some instances, outside resources such as specialist contractors/consultants may be required.

Remedial action may include:

- Remediate and rehabilitating any exposed areas of soil and/or waste; and
- Monitoring surface water leaving the premises.

6.2.6 Record

An assessment of the incident will be conducted and documented to minimise the potential for similar events in the future. Every environmental incident will be recorded in reDirect Recycling's electronic record system. If the system is unavailable, then the incident will be recorded on reDirect Recycling's Non-Conformance Report.

A copy of all completed forms will be maintained by the Operations Manager within a register of accidents, incidents and potential incidents. The register shall be made available for inspection at any time by the independent Hazard Auditor, DPE and the NSW EPA (See **Section 7.2.2**, Condition C11).

Complaints made in relation to potential pollution resultant of site operations shall be recorded as outlined under **Section 9.3.1** of this OEMP.

6.2.7 Review

In the instance an incident report is submitted, the Environmental Incident Management Strategy will be reviewed as outlined under **Section 11** of this OEMP.

6.3 Preventative Actions

Following completion of incident management, appropriate preventative measures should be identified and implemented to negate the possibility of re-occurrence.

6.4 Environmental Response Plans

The following documents include identification of situations that have the potential to impact the environment and measures to prevent, respond to and mitigate such impacts:

- **Sections 5, 6 and 7** of this OEMP.
- Procedure for Traffic Management under the TMP (**Attachment 8**).
- Procedure for Dust and Litter Minimisation under WMP (**Attachment 4**) and AQOMP (**Attachment 2**).
- Procedure for Minimising Noise Pollution in **Sections 5 and 7** of this OEMP and ONMP (**Attachment 5**).
- Procedure for Non-Conforming Waste under WMP (**Attachment 4**).
- Procedure for Stormwater Pollution Prevention under **Sections 5 and 7** of this OEMP, the SWMP (**Attachment 6**) and SWA (**Attachment 3**).
- Procedure for Emergency Preparedness and Response under **Sections 5 and 6** of this OEMP and the ERP (Error! Reference source not found.).
- Procedure for Fire Prevention under **Section 5** of this OEMP and the ERP (Error! Reference source not found.).
- Procedure for Weighbridge Management under **Sections 7** of this OEMP and the WMP (**Attachment 4**).
- Pollution Incident Response Management Plan.
- Waste Management Plan (**Attachment 4**).

Collectively, these documents are known as the Facility's Environmental Response Plans and will be used throughout the duration of operation of the Facility.

7 Monitoring & Reporting

Environmental monitoring will be undertaken in accordance with the requirements of this OEMP, however where visual inspections and auditing determine a potential non-compliance monitoring may then be undertaken to validate the impacts.

If ongoing environmental monitoring is deemed necessary, all environmental monitoring equipment will be maintained and calibrated according to the manufacturers specifications and appropriate records kept.

Non-conformances relating to the Facility activities and the OEMP include the following:

- An incident or near miss with actual or the potential for environmental impact.
- An incident or near miss with actual or the potential for environmental compliance impact with legal requirements.
- A non-conformance with the OEMP requirements described in the EMPs or other environmental directives.
- Non-conformances generated from monitoring and auditing the OEMP and EMPs.
- Significant failure to implement mitigation measures.
- Complaints not resolved within 24 hours.

Table 19 provides a schedule for auditing the OEMP and associated documents.

7.1 Ongoing Recording Requirements

Table 17 below listed items to be recorded onsite during the operation of the Facility. Additional recording requirements are outlined under sub-plans to this OEMP.

Table 17 Records to be maintained onsite

CONDITION	ITEM	FREQUENCY
-	All documents / records listed in the following subsections of this OEMP	As per the following subsections
-	<p>All weighbridge records will be maintained as required by the POEO (Waste) Regulation and for the life of the development. The weighbridge records will be made immediately available on request by the Secretary and/or the EPA.</p> <p>Incoming: record all incoming wastes and resources by category, customer, and place of origin.</p> <p>Outgoing: all outgoing loads will be weighed and recorded by category, customer, destination and transporter.</p>	As applicable.
B5	The quantity, type and source of waste received onsite (in tonnes) each day; and The quantity type and source of the waste outputs produced on site.	Daily
B5	All waste data will be maintained for the life of the Facility in accordance with the requirements of the EPA	As applicable.

7.2 Continuous Monitoring

7.2.1 Monitoring & Actions

The Site Manager, personnel and associated contractors shall be trained into what constitutes a non-compliance and how non-compliances are to be managed. Potential non-compliances are to be managed as outlined under **Section 8.2** of this OEMP.

7.2.2 Reporting

In accordance with Condition C7, **any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment**, a report shall be supplied to DPE outlining the basic facts. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventive measures. That report must be submitted to the Secretary no later than 30 days after the incident or potential incident.

Complaints made in relation to potential pollution resultant of site operations shall be recorded as outlined under **Section 9.3.1** of this OEMP.

reDirect Recycling will provide written details of incidents to the EPA and any other relevant agencies within 7 days of the date on which the incident occurred.

A register of accidents, incidents and potential incidents will be maintained by the Operations Manager / Environmental Manager. The register shall be made available for inspection at any time by the independent Hazard Auditor and DPE.

7.3 Monthly Monitoring

7.3.1 Monitoring

A monthly site inspection will be undertaken by the Site Manager, Environmental Manager or appropriate delegate throughout the duration of operation of the Facility. The intent of the inspection will be to identify any potential non-compliances or potential improvements for site management that would reduce environmental impacts or aid in overall compliance of operations.

7.3.2 Reporting

Personnel undertaking monthly inspections of operations will record results and recommendations on a monitoring card (see **Attachment 10** or example). The monitoring card may be replaced by a digital / tablet monitoring form if deemed to be more sustainable or suitable for ongoing management of the Facility.

The results of monthly inspections will be stored on the online project management system *DataStation*, with results and recommendations passed onto the Operations Manager and Environmental Manager. It will be the responsibility of the Operations Manager to ensure that all non-compliances are rectified and potential opportunities for improvement addressed following internal monthly monitoring. The Operations Manager / Environmental Manager may delegate tasks arising from monthly inspections to the Site Manager but remain responsible for ensuring these tasks are carried out onsite.

Results and actions of Internal Audits will be documented for use in the annual Compliance Report (prepared in accordance with Compliance Reporting Post Approval Requirements [Department 2020]) and to update Management Plan(s) when required (as per **Section 11**).

It will be the responsibility of the Operations Manager and Site Manager to implement corrective actions and improvement opportunities following quarterly monitoring events. This may be undertaken in consultation with the Environmental Manager to determine whether identified 'opportunities for improvement' are feasible for implementation at the Facility.

7.4 Quarterly Monitoring

7.4.1 Stormwater System Maintenance

Table 18 below outlines Stormwater device monitoring and maintenance to be undertaken at the Facility. Stormwater monitoring and maintenance will be undertaken on a quarterly basis to ensure the stormwater systems remains functional throughout the lifetime of the Facility. Additional monitoring and maintenance events may be undertaken at the discretion of the Operations Manager and / or Environmental Representative if deemed appropriate (e.g. following adverse weather).

A record of all monitoring and maintenance activities will be maintained, to be provided to regulatory bodies if requested.

Table 18 Stormwater monitoring and maintenance to be undertaken at the Facility

ITEM TO BE MONITORED	MONITORING TASK	PURPOSE OF MONITORING	MAINTENANCE ACTION
GENERAL			
Sediment Build-Up	Check for excessive build- up of sediment in stormwater system including pits and pipes.	If sediment accumulates in stormwater pits and pipes, capacity reduction can occur.	Once sediment source has been identified and stabilised, remove accumulated sediment by flushing the system and/or emptying the GPT.
	If sediment build up is noted, identify source.	Excessive build-up of sediments in GPT can reduce the effectiveness of the devices over time.	
Erosion or Scour	Check for erosion and scour around the structures.	Erosion impairs filtration systems by preventing uniform distribution of flow through the system.	Fill in any holes with appropriate filter media.
	If scour is noted check for source of scour.		Provide energy dissipation if required.
Litter (Anthropogenic)	Check for litter in and around treatment areas and structures.	Litter can potentially block inlet and outlet structures resulting in flooding, as well as detract from the system's visual amenity.	Address source of litter with appropriate action. Remove litter
Litter (Organic)	Check for organic litter, including leaves and sticks.	Organic litter can provide an additional source of nutrients to the filtration systems. Accumulated organic matter can also create offensive odours and can reduce percolation of water into the filter media.	Identify and address sources of organic litter with appropriate action. Remove litter.
Inlet and Outlet Pits	Ensure inflow areas and grates over pits are clear of litter and are in good/safe condition.	If pits become blocked it is likely to greatly reduce the amount of stormwater entering the system.	Remove debris and repair any structural damage as required.
	Check for dislodged or damaged pit covers and ensure safety and general structural integrity.	Pit covers could also be a safety hazard if not fitted correctly.	
DEVICES			
Ecosol GPT 4200	Ensure the settlement collection chamber is not full.	If the litter collection chamber becomes full then the device will be unable to collect gross pollutants from stormwater.	Organise a vacuum truck to clean the unit.
	Check for dislodged or damaged covers and ensure general structural integrity of the device.	Dislodged or damaged pit covers present a safety hazard.	Contact the manufacturer or contractor to repair any structural damage.
	Maintenance is generally to be in accordance with the manufacturer's instructions and procedures.		

ITEM TO BE MONITORED	MONITORING TASK	PURPOSE OF MONITORING	MAINTENANCE ACTION
Rainwater Tanks	Ensure downpipe leaf eaters, first flush devices and litter screens are unblocked and are operating correctly.	If any of the fixtures are not operating correctly, it is likely that sediment and debris will accumulate in the tank and reduce water quality.	Remove any litter, settlement, or debris from the devices.
	Regularly check the structural integrity of the tanks.	If the tank is not structurally sound, it is likely to fail.	Repair or replace any damaged components.
	Check for any accumulated litter, sediment, or debris on or within the tanks.	Accumulated materials within the tanks will reduce water storage capacity and may reduce water quality.	If any accumulation is found within the tank, then drain and flush the tank with potable water.
Wheel Wash	Check daily for wheel washer damage (main frame, water protector and side pipeline).	Failure of the wheel wash to perform as designed may result in heavy vehicles tracking mud onto public roads and local overflows of low quality water and accumulated sediments.	Contact maintenance contractor if structural integrity of the wheel wash has been compromised.
	Check weekly for any spray nozzle clogging (lower and side nozzles).		Remove debris from nozzle inlets. Disassemble the side nozzles and remove dirt inside.
	Check daily the status of wash water storage (for contamination and makeup water availability).		Replenish wash water, clean the pump screen inlet and disassemble the solenoid valve and remove dirt from inside.
	Check daily the sludge storage status (for sludge overflow and wash water leaks).		Remove sludge from main frame as required by vacuum truck.
	Inspect daily the surface of the wheel wash for debris.		Remove deposited debris from the wheel wash surface.
	Maintenance is generally to be in accordance with the manufacturer's instructions and procedures.		

7.5 Waste Monitoring and Recording

Waste monitoring, recording and document storage required for operation of the Facility is outlined under Section 3 of the Facility WMP (see **Attachment 4**) and in section 2.7.2. Monitoring and recording will include:

- **Record Keeping** – Outlines items that must be recorded during operation and the method of storage that will be implemented throughout operation.
- **EPA Waste and Resource Reporting Portal** - Monthly reporting will be undertaken with reference to Section 88 of the *Protection of the Environment Operations Act 1997*. Levy liable facilities must submit a waste contribution monthly report (WCMR) to the EPA to report on all waste received and waste sent for recycling in order to determine whether the facility is liable for payment of the waste levy.
- **EPL Annual Return** – details the requirements surrounding the submission of the Annual Return for the Facility, including submission date, components of the Annual Return and requirements surrounding potential transfer of the Facility EPL. This information is also outlined under this OEMP in **Section 7.9.1**.
- **Document Storage** – outlines waste related documents to be retained onsite and period of retention.

7.6 Surface Water Monitoring

Surface water monitoring will be undertaken as outlined under Section 4.2 of the SWMP (see **Attachment 6**), summarized as follows:

- **Weekly monitoring** – general walkover of the site, with results included in annual Compliance Report if applicable. This monitoring may result in required maintenance if non-compliances, ponding, spills and / or damage to stormwater structures are identified.
- **Quarterly monitoring** – monitoring and maintenance to be undertaken as stipulated above in **Section 7.4.1**. The results of quarterly monitoring and following actions will be documented to be included in the Facility Annual Compliance Report as relevant.
- **Surface water sampling** – undertaken at StormFilter chamber outlet bi-annually (following a rainfall event) for two years then annual (subject to review of results) in accordance with Section 4.2 of the SWMP. Sampling results and resultant actions will be documented to be included in the Facility Annual Compliance report as relevant.
- **Triggered** – undertaken following environmental incident and / or unexpected find. The scope will be dependent on the trigger and should be determined in collaboration with a suitably qualified environmental consultant. Results of these sampling events will be documented for compliance and to be included in the Annual Compliance report as relevant.

7.7 Noise Monitoring

Condition B27 of the SSD-10474 Consolidated COA requires the operator of the Facility to ensure that that noise generated by operation of the Facility does not exceed the noise limits, measured in dB(A) at all residential receivers as per below:

- Day - $L_{Aeq}(15 \text{ minute}) - 49$.
- Evening - $L_{Aeq}(15 \text{ minute}) - 43$.
- Night - $L_{Aeq}(15 \text{ minute}) - 38$.
- Night - $L_{A1}(1 \text{ minute}) - 52$.

Given the number of industrial premises between the Subject Site and the nearest residential receiver, the establishment of noise monitoring locations to monitor compliance with Condition B27 is not considered to be practical as a routine practice. As such, it is proposed that noise monitoring will be driven on a complaints-based system, whereby a noise complaint attributed to Facility operation will be investigated by the Environmental Manager, which may include the establishment of noise monitoring locations in the proximity of the complainant.

In accordance with Condition B27, any monitoring and assessment of noise generated by the Facility will be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the *NSW Industrial Noise Policy*. Monitoring and assessment will be undertaken by a suitably qualified consultant, with the implementation of additional noise mitigation measures in the event that operational noise is intrusive to surrounding receivers and / or is deemed non-compliant with the SSD-10474 COA.

Results of any noise monitoring and assessment will be included within the Compliance Report for the relevant year (see **Section Error! Reference source not found.**).

Non-compliances regarding noise generation will be managed as outlined under **Section 8.2.2**.

7.8 Annual Compliance Report

7.8.1 Monitoring

In accordance with Condition C11, the Facility Operations Manager / Environmental Manager will annually review the environmental performance of the Development to the satisfaction of the Secretary. This review will be undertaken within six months after the first year of commencement of operation, and in the same month each subsequent year (or other timing as agreed by the Planning Secretary).

Annual monitoring will include an assessment of the operational compliance and feasibility of controls listed under this OEMP and all associated sub-plans. The intent will be to identify possible opportunities for improvement in site management as well as identifying management controls that are not practical for implementation for the Facility. **Any updates to management plans will require DPE approval, while modification or removal of any controls enforced under SSD-7401 Consolidated COA would require an SSD Modification Application to be submitted to DPE for approval.**

A third party, suitably qualified consultant may be engaged to prepare the Annual Compliance Report on behalf of reDirect Recycling. The Compliance Report will be reviewed and issued by reDirect Recycling as per the following section.

7.8.2 Reporting

Annual Monitoring will inform the preparation of the Annual Compliance Report that will:

- Be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020)
- Identify any trends in the monitoring data over the life of the development.
- Identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies.
- describe what measures will be implemented over the next year to improve the environmental performance of the development.

In order to fulfil the requirements of Condition C11, each Compliance Report will be submitted to the Secretary of DPE for acceptance. All actions and recommendations outlined under the Compliance report will be undertaken as soon as practicable.

In accordance with Condition C12, each Annual Compliance Report will be uploaded to the reDirect Recycling website no later than 60 days after submitting it to the Planning secretary and notify the Planning secretary in writing at least seven days before this is done.

7.9 NSW Environment Protection Authority (NSW EPA)

7.9.1 Waste and Resource Reporting Portal

Monthly reporting will be undertaken with Section 88 of the *Protection of the Environment Operations Act 1997*. Levy liable facilities must submit a waste contribution monthly report (WCMR) to the EPA to report on all waste received and waste sent for recycling in order to determine whether the facility is liable for payment of the waste levy.

7.9.2 Annual Return (EPL 21487)

EPL 21092 defines the EPL reporting period as “.....the period of 12 months after the issue of the licence, and each subsequent period of 12 months. In the case of a licence continued in force by the *Protection of the Environment Operations Act 1997*, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.”

EPL 21092 was issued on 22 April, as such the relevant **reporting period** is between 22 April each year. The NSW EPA will provide the form to complete the Annual Return each year, to be completed within 60 days from the completion of the relevant reporting period.

The Annual Return will require the following:

- A Statement of Compliance.
- A Monitoring and Complaints Summary.
- A Statement of Compliance – Licence Conditions.
- A Statement of Compliance – Requirement to Prepare Pollution Incident Response Management Plan.
- A Statement of Compliance – Requirement to Publish Pollution Monitoring Data.
- A Statement of Compliance – Environmental Management Systems and Practices.

Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary will be signed by:

- the licence holder; or
- by a person approved in writing by the EPA to sign on behalf of the licence holder.

In accordance with Condition R1.6 of EPL 21092, copies of Annual Returns will be retained for at least four (4) years.

Where EPL 21487 is transferred to a new licensee (Condition R1.3 of EPL 21487):

- the transferring licensee (ReDirect Recycling) must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
- the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee (ReDirect Recycling) will prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on (Condition R1.4 of EPL 21487):

- in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
- in relation to the revocation of the licence - the date from which notice revoking the licence operates.

7.9.3 EPA Request for Information

Condition R3 (R3.1 – R3.4) of EPL 21487 outlines the methodology that will be undertaken in the event that the NSW EPA requests a written report to address possible pollution. Under Condition R3.1, the NSW EPA may request a written report in the following circumstances:

- where the licence applies to premises, an event has occurred at the premises; or
- where the licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by the licence,
- and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.

In the event the NSW EPA request further information regarding the Facility, reDirect Recycling will make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.

Under Condition R3.3, the resultant report may include any or all of the following information:

- The cause, time and duration of the event.
- The type, volume and concentration of every pollutant discharged as a result of the event.
- The name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event.
- The name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort.
- Action taken by the licensee in relation to the event, including any follow-up contact with any complainants.
- Details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event.
- Any other relevant matters.

It is noted that the NSW EPA may request further information. This will be provided by reDirect Recycling as required.

7.10 Independent Environmental Audits

In accordance with Condition C13, Independent Environmental Audits are to be commissioned and conducted by a suitably qualified and independent team of experts on the following basis (unless directed otherwise by the Secretary):

- Within one (1) year of the commencement of operation.
- Every three (3) years thereafter.

The Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. Audits must:

- Be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020).
- Be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and
- be submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).

In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must:

- Review and respond to each Independent Audit Report prepared under condition C13 of the COA;
- Submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations;
- Implement the recommendations to the satisfaction of the Planning Secretary; and

- Make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done.

7.11 Facility Website

In accordance with Condition C16, up to date copies of the following documents will be maintained on the reDirect Recycling website:

- The documents referred to in condition A2 of the COA.
- All current statutory approvals for the development.
- All approved strategies, plans and programs required under the conditions of this consent.
- Regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent.
- A comprehensive summary of monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs.
- A summary of the current stage and progress of the development
- Contact details to enquire about the development or to make a complaint.
- A complaint register updated monthly.
- The compliance report of the development
- Audit reports prepared as part of any Independent Audit of the development and the applicant's response to the recommendations in any any audit report.
- Any other matter required by the Planning Secretary.

7.12 Monitoring / Management Schedule

Table 19 provides a schedule for auditing the OEMP and associated documents. For clarification, **Table 19** does not include routine and / or continuous monitoring required for the operation of the Facility, this is covered in the subsections above and within the relevant section(s) of sub-plans to this OEMP.

Table 19 assumes the commencement of operation will occur in June 2022. The exact timing of items listed below in **Table 19** will be dependent on the final date of the commencement of Facility operation.

Table 19 Auditing Schedule.

RELEVANT CONDITION(S)	ITEM	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
Overall Compliance	Site Inspections	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Overall Compliance	Stormwater Maintenance			✓			✓			✓			✓
B5 (WMP)	Waste Contribution Monthly Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
B3 (OTMP)	OTMP and Drivers Code of Conduct Review						✓						
B17 (SGWMP)	Site Walkover (weekly)	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓
B17 (SGWMP)	Surface Water Sampling (First two years of operation)						✓						✓

RELEVANT CONDITION(S)	ITEM	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
B17 (SGWMP)	Surface Water Sampling (Remainder of duration of operation unless determined otherwise)						✓						
C3	Complaints Register (see Section 9.3).	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
EPL 21487 (R1.1, R1.2, R1.5, R1.7)	EPL Annual Return (Due 60 days from 22 April)				✓								
C11	Yearly Compliance Report (Environmental Management Review)	Within 6 months after the first year of commencement of operation of the development, and in the same month each subsequent year (or such timing as agreed by the Planning Secretary). Undertaken as outlined under Section 7.8											
C13	Initial Independent Audit (Audit Report)	Within one (1) year of the commencement of Operation. Undertaken as outlined under Section 7.10 .											
C13	Additional Independent Audits (Audit Reports)	Every three years (1) following the Initial Independent Audit. Undertaken as outlined under Section 7.10 .											

8 Compliance Management

8.1 Compliance Tracking

Facility compliance will be tracked through ongoing monitoring (see **Section 7**) and management of complaints (see **Section 9**) regarding the operation of the Facility.

8.2 Non-compliances

8.2.1 Identification

Non-compliances may be identified in a number of ways, including but not limited to:

- Through routine management of the facility.
- During targeted monitoring undertaken under the Facility OEMP.
- During the preparation of internal and external audits listed under the Facility OEMP.
- Through additional site inspections undertaken by the Operations Manager, Site Manager, Environmental Manager and / or authorised delegate.
- Following a request for information from a government authority (e.g. NSW EPA, DPE).

8.2.2 Response

The Facility Operations Manager should be contacted immediately following the identification of a potential non-compliance. In the event that the Operations Manager cannot be contacted the Facility Environmental Manager contact should be contacted. The Operations Manager / Environmental Manager will then be responsible for investigating the cause of the non-compliance and to determine whether additional site management / mitigation measures need to be applied to address the non-compliance and prevent reoccurrence. Implementation of these measures may be delegated to the Site Manager, however it is the responsibility of the Operations Manager and Environmental Manager to ensure that appropriate measures have been implemented and that the non-compliance has been rectified.

Where a non-compliance may also constitute an *incident*, incident notification shall occur as outlined **Section 6.2**.

Where a non-compliance is identified, works in relation to the non-compliance will be stopped wherever possible. Remedial action will be undertaken, which may require the engagement of consultants in some cases and / or consultation with DPE. Actions will be put in place to rectify the non-compliance immediately, with further mitigation / remedial actions to be applied following investigation into the cause of the non-compliance.

If recurring non-compliances are identified (e.g. noise exceedances) additional mitigation measures may be applied to prevent future non-compliances. Where a non-compliance is identified as an integral activity to support the operation of the business this will be communicated to DPE. A modification to the standing SSD approval may be required in these cases.

It is noted that the standing COA for the Facility does not require DPE notification in the event of a non-compliance, beyond reporting requirements listed below and under Section 7 of the Facility OEMP.

9 Communicating the OEMP

9.1 Internal Communications

The minimum internal communications required to administer, maintain and update the OEMP is outlined in **Table 20**.

Table 20: Minimum internal communications.

POSITION	INTERNAL COMMUNICATIONS WITH:
Operations Manager	<ul style="list-style-type: none"> Site Manager and Environmental Manager: <ul style="list-style-type: none"> Promote Environmental Policy Performance against the OEMP Objectives and Targets OEMP and compliance audit results
Site Manager / Environmental Manager	<ul style="list-style-type: none"> Operations Manager: <ul style="list-style-type: none"> Consult and obtain approval for Objectives and Targets. Immediate notification of pollution incidents of material harm to the environment. Annual reporting on: <ul style="list-style-type: none"> Performance against the OEMP Objectives and Targets. OEMP and compliance audit results. Annual return reporting as per the Facility EPL. Monthly Inspections against OEMP Mitigation measures: Monthly Waste Reporting. Operational Staff <ul style="list-style-type: none"> Leading the OEMP Management Review. Liaison and annual update of OEMP and EMPs.
Operator/contractors	<ul style="list-style-type: none"> Site Manager <ul style="list-style-type: none"> Immediate notification of pollution incidents of material harm to the environment Notification of non-material of pollution incidents within 24 hours of occurrence Monthly reporting on: <ul style="list-style-type: none"> Pollution incidents and status of incident closure Progress implementing the OEMP Corrective actions arising from site inspections and other surveillance

9.2 External Communications

All external communications must be undertaken in accordance with corporate protocols on communications with stakeholders and the media.

The minimum external communications required to administer, maintain and update the OEMP and personnel responsible for the communication is outlined in **Table 21**.

Table 21 Minimum external communications.

MESSAGE TYPE/FREQUENCY	RESPONSIBILITY ALLOCATED TO:	METHOD OF COMMUNICATION:
Media response, media releases and/or material pollution incidents (As required)	Operations Manager	Telephone, email, letter. Media release website
Licence Monitoring Data (as required)	Environmental Manager	Website
Notification to regulators and emergency response of material pollution incident (as required)	Environmental Manager / Operations Manager	As per PIRMP
Notification to stakeholders of non-material pollution incident (as required)	Environmental Manager / Operations Manager	Telephone, email, letter, website
Response to community complaints and/or non- material pollution incidents	Site Manager / Operations Manager	Telephone, email, letter.

9.3 Community complaints

A community complaint handling process has been developed to ensure all environmental complaints regarding the operation of the Facility are promptly and effectively received, handled, and addressed.

reDirect Recycling is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of a complaint. All employees and contractors who receive a complaint, either verbal or written, are to immediately notify Site Management.

Community complaints relating to the Facility can be received via:

- reDirect Recycling company or site office.
- reDirect Recycling Complaints and Feedback number – 02 4340 9800 (BORG Group Head Office).
- reDirect Recycling Internet enquiry – TBC.
- Through a government agency (i.e. Council or EPA).

9.3.1 Handling Procedure

Upon becoming aware of a complaint, reDirect Recycling Site Management will follow the below process.

Receive

In the normal course of events, the first contact for complaints will usually be made in person or by telephone.

While this should instigate investigative action, a formal written complaint should be requested. Where the initial contact reaches an employee or contractor who is not a representative of Site Management, the call should be directed to Site Management. If unavailable, the complainant's details should be taken with a view to returning the contact once Site Management is in a position to discuss the matter.

The complainant's name, address and contact details, along with the nature of the complaint, must be requested. If the complainant refuses to supply the requested information, a note should be made on the form and complainant advised of same. The date and time of the complaint will also be recorded along with the method the complaint was made.

Assistance

Where assistance is required handling the situation, reDirect Recycling Management should be contacted. Where the complaint is reported via a government agency (i.e. Council or the EPA), reDirect Recycling's Operations Manager must be notified immediately (even if outside of normal business hours).

Investigate

A field investigation should be initiated in an attempt to establish the legitimacy of the complaint and the cause of the problem. reDirect Recycling's Management should be consulted to identify any abnormality or incident that may have resulted in the complaint. Details may include heavy vehicle activity, equipment and machinery activities, etc.

If the complaint is due to an environmental incident, the management strategy outlined in Section 6 should be followed, and if the incident has caused or threatens to cause material harm to the environment each of the relevant regulatory agencies must be immediately notified.

Action

Once the legitimacy and cause of the complaint has been established, every possible effort must be made to undertake appropriate remedial action(s) to fix the cause of the complaint and mitigate any further impact.

Inform

The investigative work and remedial action should be reported back to the complainant and, if necessary, the relevant regulatory agencies.

Record

Every complaint received is to be recorded within the complaints register located in reDirect Recycling's electronic record system. If the system is unavailable, then the complaint is to be recorded on reDirect Recycling's Incident Non-Conformance Report Form. The complaints register will be updated on a monthly basis and made publicly available on reDirect Recycling's website.

In accordance Condition M2.2 of EPL 21092, the following details will be recorded at minimum:

- The date and time of the complaint.
- The method by which the complaint was made.
- Any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect.
- The nature of the complaint.
- The action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant.
- If no action was taken by the licensee, the reasons why no action was taken.

The complaints register will record the action taken by reDirect Recycling in relation to the complaint or if no action taken the reason why no action was taken.

Complaint records will be kept for at least 4 years after the complaint was made. The record must be produced to any authorised officer of the EPA who asks to see them.

Preventative Action

Once the complaint has been suitably handled, appropriate preventative measures will be identified and implemented to negate the possibility of re-occurrence.

Dispute Resolution

In the event that a dispute arises between reDirect Recycling and Penrith City Council or a public authority, in relation to an applicable requirements of the COA or relevant matter relating to the site, either party may refer the matter to DPE (Planning Secretary) for resolution. The Planning Secretary's determination of any such dispute must be final and binding on the parties.

In the case of a dispute between reDirect Recycling and a community member/complainant, either party may refer the matter to the relevant regulatory authority for consideration, advice and/or negotiation. If the matter escalates, a third-party mediator may be required.

10 Document Control

The following documents are controlled documents controlled by Operations Manager:

- The OEMP.
- Environmental Management Plans.
- Forms, templates and proformas.
- Registers.
- Progress reports.
- Monitoring data.
- Annual progress report to management.
- Statutory monitoring and reporting.

10.1 Document Control Procedure

The current versions of all OEMP Documents are available as 'read-only' documents. An up-to-date copy (with version control) of each document will be held on a secure server with relevant linkages to systems and management.

Only the current, electronic versions of OEMP Documents accessed through the secure server mentioned in the preceding paragraph are controlled. If using hard copies of OEMP Documents, it is the users' responsibility to ensure that they are using the latest version. All hard copies are uncontrolled.

The Environmental and/or Operations Manager is responsible for the storage, review and update of all controlled OEMP documents.

The Environmental and/or Operations Manager will maintain a Register of Current Version of OEMP documents. The Register will record Document Title, Current Version Number and Date current version was made effective.

The Operations Manager will ensure that each controlled document is appropriately tagged with Document Title, Current Version Number and Date current version was made effective. In addition, a summary of each revision will be documented in the revision history table on each controlled document.

11 OEMP Updates

This OEMP is an operational document. As such, ongoing maintenance of this OEMP is essential to ensure that management procedures remain current and feasible to implement. The below processes have been established to facilitate improvement of the OEMP through periodic formal review and discussion of OEMP performance to determine whether the OEMP remains suitable, adequate and effective for the Facility.

11.1 Required Updates

In accordance with Condition C8, this OEMP will be updated within three (3) months of the following events:

- approval of a modification;
- approval of an annual review under Condition C9;
- submission of an incident report under Condition C10; and
- completion of an audit under Condition C14.

It is noted that under Condition C8 that *“the Applicant must review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.”* As such, where any of the above listed events require an update to this OEMP and / or supporting documents, communication with DPE will be required. Communication will occur in two ways:

- DPE will be provided updated documents for endorsement of the Secretary in the event that updates relate to a change in operation or management of the Facility.
- Minor amendments such as administrative changes may not require endorsement from the Planning Secretary. DPE will be notified of minor changes, seeking feedback as to whether approval of the updated document is required by the Planning Secretary.

11.2 Management Review

In addition to the above, routine monitoring and / or Management Review of the Facility may identify the need for updating the OEMP. The Management Review is facilitated by the Operations Manager or Environmental Manager, ensuring the recommendations of the Management Review are implemented. Under Condition C11, compliance of the Facility is to be assessed and reported on a yearly basis), however additional Management Reviews may be undertaken at any time at the discretion of the Operations Manager or Environmental Manager to assess compliance of operations and to determine whether the OEMP is suitable, adequate and effective for the Facility.

Any update of the OEMP and / or supporting documents is to be managed in consultation with DPE as per **Section 11.1**.

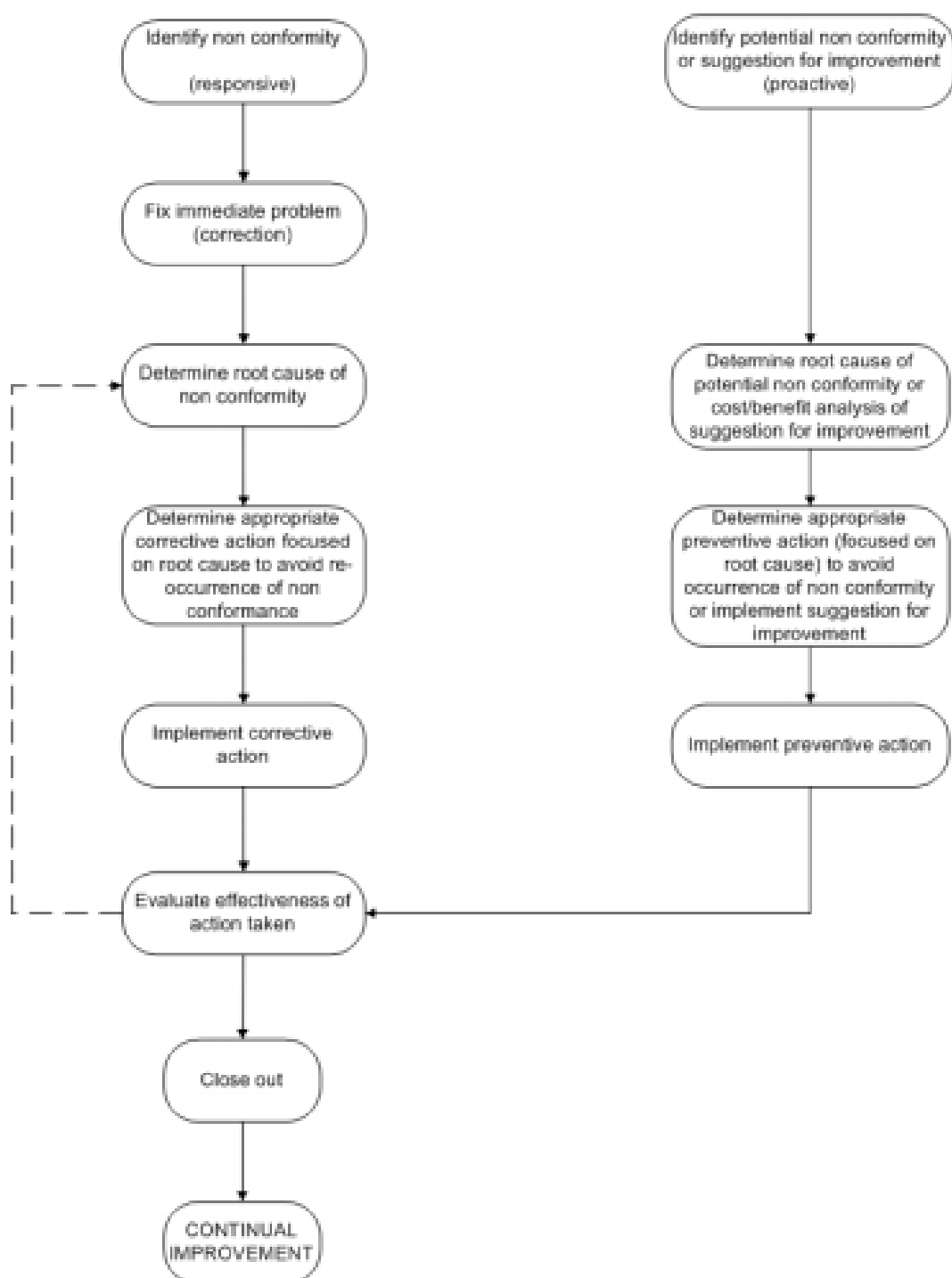
11.3 Continuous Improvement

reDirect Recycling are committed to the concept of continual improvement in both the application and management of operations at the Facility. Internal audits, external audits (see **Section 7**) and consultation (see **Section 9**) may advise improvements or modifications to site management and practices. **Figure 4** below outlines the method of continuous improvement to be applied following monitoring and site auditing events while **Figure 5** below outlines the methods to be applied in the event that an incident occurs onsite (see **Section 6.2**), current or potential future non-conformances are identified during monitoring, or following audits undertaken at the Facility.

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graph TD; A[Environmental Assessment] --> B[Objectives and Targets]; B --> C[Emergency Response and Preparedness]; C --> F[Management Review]; D[Consultation with management and external stakeholders] --> F; E[Monitoring and reporting] --> G[Non-conformance and corrective actions]; G --> H[Audits]; H --> F; F --> I[Management Review Report]; I --> J[Changes to the EMS];
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The flowchart illustrates the Environmental Management System (EMS) process. It begins with 'Environmental Assessment', which leads to 'Objectives and Targets'. From 'Objectives and Targets', the process flows to 'Emergency Response and Preparedness'. 'Consultation with management and external stakeholders' also leads directly to 'Management Review'. 'Monitoring and reporting' leads to 'Non-conformance and corrective actions', which then leads to 'Audits'. Both 'Emergency Response and Preparedness' and 'Audits' lead to 'Management Review'. 'Management Review' leads to 'Management Review Report', which finally leads to 'Changes to the EMS'.

Figure 5 Continuous Improvement Process.



12 Conclusion

The OEMP has been prepared in accordance with Condition C2 and C3 of SSD-10474 Consolidated COA and considers AS/NZS ISO 14001:2016 *Environmental management systems* and *Environmental Management Systems Guidelines - Risk-based licensing* (NSW EPA, 2015). This OEMP outlines the policies, systems and procedures that reDirect Recycling have committed to for protecting the environment during the operation of the Facility, while also considering how key environmental and operational issues will be managed.

Any updates to this OEMP are to be managed as outlined under **Section 11**.

Attachment 1: SSD-10474 Consolidated Approval & Approved Plans

Attachment 2: Air Quality Management Plan

Attachment 3: Stormwater Assessment

Attachment 4: Waste Management Plan

Attachment 5: Noise management Plan

Attachment 6: Surface Water Management Plan

Attachment 7: Emergency Response Plan

Attachment 8: Operational Traffic Management Plan

Attachment 9: EPL 21092

Attachment 10: Example Environmental Inspection Form

WETHERILL PARK RESOURCE RECOVERY FACILITY

Monitoring Card

Inspection Date

Staff / Contractor Name

Staff / Contractor Position

Staff / Contractor Company

Purpose of Inspection

☐

General Inspection

☐

Management Plan Audit

☐

Compliance Audit

☐

Other, please state:

Results

Non-compliances

Opportunities for Improvement

Recommended Actions

This monitoring card is to be provided to the Wetherill Park Resource Recovery Facility Operations Manager to address non-compliances and opportunities for improvement in-line with operational management plans and the relevant conditions of consent.

