Conceptual Decommissioning Management Plan

ReDirect Recycling Pty Ltd
Resource Recovery and Recycling Facility

24 Davis Road Wetherill Park, NSW

Date: 10/01/2024
Prepared by: Space Urban Pty Ltd
Version: Rev 2

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1 Introduction

1.1 Project Approval

This Conceptual Decommissioning Management Plan (DMP) has been prepared by Space Urban Pty Ltd (Space Urban) on behalf of reDirect Recycling Pty Ltd (reDirect Recycling), for the operation of Stage 1 of the Resource Recovery and Recycling Facility (the Facility) located at 24 Davis Road Wetherill Park, NSW (the Subject Site). This DMP forms part of the overarching Operational Environmental Management Plan (OEMP) required for operation of the site.

Consent for State Significant Development 7401 (SSD-7401) was initially granted by the then NSW Department of Planning and Environment (DPE) on 22 December 2017. Consent for Modification 1 (Mod1) of SSD-7401 (SSD-7401-Mod-1) was approved by the NSW Department of Planning, Industry and Environment (DPIE) on 21 April 2021, with consent for Modification 2 (SSD-7401-MOD-2) was granted on 30 November 2021. Consent for Modification 3 (SSD-7401-MOD-3) was granted by DPE (name reverted from DPIE) on 1 April 2022. See **Attachment 1** for Consolidated Conditions of Approval (COA) for SSD-7401.

Approval for SSD-7401 permitted the construction and operation of a resource recovery facility to process up to 160,000 tonnes per annum (tpa) of waste comprising of:

- 60,000 tpa of hydro-excavation, drill muds and fluids.
- 70,000 tpa of food and garden organics.
- 30,000 tpa of packaged and bulk food and liquids.

In addition, the approval for SSD-7401 allowed for the operation of a landscaping material supplies facility for the storage and sale of up to 40,000 tpa of landscaping supplies.

Approval of SSD-7401-MOD-1 allowed for the increase of processing capacity to 350,000 tpa in conjunction with the following:

- Introduction of additional waste streams.
- Demolition of existing structures.
- Construction of a partially enclosed shed.

SSD-7401-MOD-2 included the replacement of the 30, 000 L sediment basin and associated bioretention basin, located within the southwest corner of the subject site. In lieu of the detention and bioretention basins it was proposed to utilise an existing inground concrete pit that remains onsite as part of a decommissioned weighbridge. This pit was modified and improved to include a sand filter to treat onsite stormwater.

SSD-7401-MOD-3 included the following:

- Replacement of the five (5) approved weighbridges with one (1) 25 m by 4.2 m weighbridge located approximately 55 m from the Facility intersection with Davis Road.
- To facilitate weighbridge installation and improve site safety, vehicle parking spaces were reconfigured:
    - Five (5) parking spaces immediately east of the existing site office.
    - Two (2) parking spaces located north of the inground sand filter, abutting the western façade of the drill muds processing shed.
    - Five (5) parking spaces located on the hardstand area immediately north of the western parcel of retained Cumberland Plain Woodland.
    - Remaining parking spaces were not altered.
- Relocation of proposed humeceptor water treatment device to the north-western corner of the central portion of Cumberland Plain Woodland onsite.
- Relocation of the 5,000 L rainwater tank to inside drill muds processing shed next to the control room. Rainwater from the existing office will now be captured via the Facility stormwater network.

The final water treatment device will be a SPEL Ecoceptor 6000 series, designed and sized to effectively meet the drainage requirements of the Facility.

See **Section 2** for further information relating to the final facility design approved under SSD-7401-MOD-3.

1.2 Project Description

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

- Hydro-excavation and drill muds;
- Garden organics, commingled food and garden organics, and food waste; and

- Bulk landscape materials and growing media.

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. The facility will further act as a distribution centre for the consolidation and distribution of bulk landscape supplies including barks, soils, sands and aggregates.

This DMP covers the operation of the Facility conducted under **Stage 1** of SSD -7404-MOD-3. **Stage 1** includes the drill mud processing area. Operation of **Stage 2** will require an update to this DMP to include the bulk landscape area and the organics processing area. Any further division of Stage 2 into substages (e.g. Stage 2 and Stage 3) will be communicated with DPE as required under the SSD-7401 Consolidated COA.

Facilities covered under this DMP (Stage 1) include:

- A main administration building, office and carpark constructed at the fore of the property. Site amenities, including toilets and kitchen, will be contained in the main administration building.
- Partially enclosed shed space, containing:
    - Two tier ground levels with external ramp to the west of the shed.
    - Four hydro-tips, with one tip-pit.
    - One weighbridge located west of the shed for the weighing of trucks on entry and prior to departure from the facility.
    - Screening walls.
    - Drill mud processing plant and equipment.
    - Drill mud machinery control rooms and internal office space.
- An inground sand filter located under the hardstand on the lower level of the site, adjacent to the south-western corner of the existing approved shed, to be used for stormwater retention and treatment.
- Rainwater / raw water storage tanks.
- Main thoroughfare, including:
    - A combined ingress/egress access driveway, providing a 12.5 m width at the western property boundary and facilitating connectivity between the off-street parking and internal heavy vehicle circulation areas.
    - Off-street parking spaces designed in accordance with AS2890.1 and AS2890.6.
- A combined ingress / egress driveway, providing a 5.5 m width adjacent to the eastern property boundary facilitating service access to the office complex only and emergency access for Fire NSW.
- Internal hardstand areas and roadways.

1.3 Site Location

The Facility is located within an industrial precinct at Lot 18 Deposited Plan (DP) 249417, 24 Davis Road, Wetherill Park NSW. The site is approximately 10 kilometres (km) north of Liverpool, 10 km west of Parramatta, and 7 km south of Blacktown. The site covers an area of approximately 20,292 m^2 and is located within the Fairfield Local Government Area (LGA).

The development is surrounded by existing manufacturing, processing, and heavy industry businesses, with the nearest residential dwellings located approximately 1.5 km to the south-east on Maugham Crescent, off The Horsely Drive.

The development area is rectangular in shape and slopes moderately from the northern boundary down to Davis Road on the southern boundary. Topography of the site varies between 36 m and 48 m Australian Height Datum (AHD) within the site boundary, increasing from south to north.

Significant disturbance of the natural environment within the site has occurred as a result of the previous development and industrial activities. The visual amenity of the development site has been highly modified, however significant vegetation exists at the front of the property creating a natural visual barrier.

1.4 Land Ownership

The Subject Site is owned by Davis Road Property Development Pty Ltd, however in this instance the sole Applicant was Bettergrow Pty Ltd. Owners consent was obtained for SSD-7401 and all subsequent modification applications as required.

1.5 Project Status

Construction of Stage 1 of the Facility is nearing completion. This DMP has been submitted as part of the overarching OEMP required prior to the commencement of operation of the Facility under Schedule 2, Condition C4 of the SSD-7401 Consolidated COA.

2 Scope & Objectives

2.1 DMP Scope

This DMP has been prepared to address Schedule 2, Condition B80 of SSD-7401, whereby:

B80. Prior to the commencement of operations, the Applicant must prepare a Conceptual Decommissioning Management Plan (DMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C7. The DMP must:

- *a) Include a schedule for the decommissioning of the Development.*
- *b) Detail how the following would be achieved:*
  - *Ensure the site is left in a safe, stable and non-polluting manner;*
  - *Removal of all waste from the site;*
  - *Restoration of the site to the existing land-use in accordance with State Environmental Planning Policy No 55 – Remediation of Land.*
  - *Ensure public safety is maintained.*
- *c) Include procedures for notification of the surrounding landowners.*
- *d) Include procedures for safe removal of any machinery and structures.*
- *e) Include measures to mitigate any environmental impacts associated with the removal of the development.*
- *f) Include details of monitoring that would be undertaken during the decommissioning of the development.*
- *g) Be reviewed 12 months prior to the closure of the site to the satisfaction of the Planning Secretary.*

State Environmental Planning Policy No 55 – Remediation of Land was repealed and replaced by the *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) on 1 March 2022 as a part of a wider consolidation of State Environmental Planning Policies (SEPPs). As such, compliance with Condition B80 is taken to require documentation as to how decommissioning would restore the site to existing land-use in accordance with Chapter 4 of the Resilience and Hazards SEPP.

In addition, this DMP has been prepared to satisfy Management Plan requirements under Schedule 2, Condition C7, which states:

The Applicant must ensure that the environmental management plans required under Condition C1 and Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include:

- *a) detailed baseline data.*
- *b) a description of:*
  - *i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);*
  - *ii) any relevant limits or performance measures/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.*
- *c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;*
- *d) a program to monitor and report on the:*
  - *i) impacts and environmental performance of the Development; and*
  - *ii) effectiveness of any management measures (see (c) above).*
- *e) a contingency plan to manage any unpredicted impacts and their consequences;*
- *f) a program to investigate and implement ways to improve the environmental performance of the Development over time;*
- *g) a protocol for managing and reporting any:*
  - *i) incidents;*
  - *ii) complaints;*
  - *iii) non-compliances with statutory requirements; and*
  - *iv) exceedances of the impact assessment criteria and/or performance criteria.*
- *h) a protocol for periodic review of the plan.*

Additional SSD-7401 COA referenced under this WMP are provided in **Section 2.2**.

2.2 Conceptual DMP Scope

This DMP forms the first iteration of the 'Conceptual' DMP and thus addresses Stage 1 of operation and will undergo a review and revision within 12 months of the cessations of operation of the Facility (Condition B80).

2.3 SSD-7401 Conditions of Approval

Table 1 below lists conditions under the SSD-7401 Consolidated COA that are addressed under this Facility DMP.

Table 1 Conditions relevant to this DMP under the SSD -7401 Consolidated COA

CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN DMP
A1	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all measures to prevent and/or minimise any harm to the environment that may result from the Development.	This DMP
A2	The Development may only be carried out in: (a) compliance with the conditions of this consent; (b) accordance with the directions of the Planning Secretary; (c) accordance with the EIS and RTS; (d) accordance with development layout plans and drawings in the EIS (see Appendix A); (e) accordance with the Management and Mitigation Measures (see Appendix B); and (f) accordance with Modification Assessments.	This DMP
A19	Where consultation with any public authority is required by the conditions of this consent, the Applicant must: (a) consult with the relevant public authority prior to submitting the required documentation to the Planning Secretary or the PCA for approval; (b) submit evidence of such consultation as part of the relevant documentation required by the conditions of this consent; (c) describe how matters raised by the public authority have been addressed and identify matters that have not been resolved; and (d) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant.	**Section 5.1** **Section 5.2** **Section 5.3**
A21	The Applicant must ensure that all demolition associated with the Development is carried out in accordance with Australian Standard AS 2601:2001: *The Demolition of Structures*, or its latest version and the requirements of the *Work Health and Safety Regulation, 2011*.	**Section 7.8**
A28	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 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.	**Section 7.2**
A30	The Applicant must ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.	**Section 9.1** **Section 9.2** **Section 9.3** **Section 9.4**
B1	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 7.9**
B8	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the EPA's *Waste Classification Guidelines Part 1: Classifying Waste, November 2014*, or its latest version and dispose of all wastes to a facility that may lawfully accept the waste.	**Section 7.9**
B57	Hours of Demolition and Construction: (a) Monday to Friday – 7am to 6pm. (b) Saturday – 8am to 1 pm. (c) Sunday – no works permitted.	**Section 7.4**

CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN DMP
B58	Works outside of the hours identified in Condition B57 may be undertaken in the following circumstances: (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 and /or prevent environmental harm.	**Section 7.4**
B80	Prior to the commencement of operations, the Applicant must prepare a Conceptual Decommissioning Management Plan (DMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C7. The DMP must: (a) include a schedule for the decommissioning of the Development; (b) detail how the following would be achieved: (i) ensure the site is left in a safe, stable and non-polluting manner; (ii) removal of all waste from the site; (iii) restoration of the site to the existing landuse in accordance with State Environmental Planning Policy No 55 – Remediation of Land; and (iv) ensure public safety is maintained. (c) include procedures for notification of the surrounding landowners; (d) include procedures for safe removal of any machinery and structures; (e) include measures to mitigate any environmental impacts associated with the removal of the development; (f) include details of monitoring that would be undertaken during the decommissioning of the development; and (g) be reviewed 12 months prior to the closure of the site to the satisfaction of the Planning Secretary.	This DMP
C7	The Applicant must ensure that the environmental management plans required under Condition C1 and Condition C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include: (a) detailed baseline data (b) a description of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures/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. (c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria; (d) a program to monitor and report on the: (i) impacts and environmental performance of the Development; and (ii) effectiveness of any management measures (see (c) above). (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the Development over time; (g) a protocol for managing and reporting any: (i) incidents; (ii) complaints; (iii) non-compliances with statutory requirements; and (iv) exceedances of the impact assessment criteria and/or performance criteria. (h) a protocol for periodic review of the plan.	This DMP

2.4 DMP Objective

The key objective of the DMP is to mitigate potential impacts resulting from the cessation of operation of the Facility at the end of the Project's useful economic life.

To achieve this objective, reDirect Recycling (acting on behalf of Bettergrow) will undertake the following:

- Ensure measures are identified and implemented to minimise waste, manage waste and conserve energy during the decommissioning of the Facility.
- Ensure the preferred waste management hierarchy of avoidance, minimisation, reuse, recycling and finally disposal is followed by staff and contractors onsite at the Facility during decommissioning.
- Provide staff with an increased level of understanding and awareness of waste and resource use management issues.
- Ensure appropriate measures are implemented to address the relevant COA (SSD-7401, SSD-7401-MOD-1, SSD-7401-MOD-2, SSD-7401-MOD-3).
- Ensure appropriate measures are implemented to comply with all relevant legislation and other requirements as described in this DMP.

2.5 Environmental Protection Licence (EPL 21092)

The Facility is currently managed subject to the provisions of an Environmental Protection Licence (EPL 21092), administered under Section 55 of the *Protection of the Environment Operations Act 1997* (POEO Act) and issued as per Section 48 of the POEO Act for the following scheduled activities:

- Resource recovery.
- Waste processing (non-thermal treatment).
- Waste storage.

EPL 21092 was issued on 10 January 2019 for the following fee-based activities:

- Non-thermal treatment of general waste.
- Non-thermal treatment of liquid waste,
- Recovery of general waste.
- Waste storage – hazardous, restricted solid, liquid, clinical and related waste and asbestos waste.
- Waste storage – other types of waste.

EPL 21092 will be updated prior to commencement of operation of Stage 1. This DMP, and the overarching OEMP, will be updated accordingly following the operational EPL being issued.

3 Development description

3.1 Facility Description

Consent for SSD-7401 was initially granted by NSW DPE on 22 December 2017. Consent for SSD-7401-MOD-1 was approved by the NSW DPIE on 21 April 2021. Consent for SSD-7401-MOD-2 was granted by NSW DPIE on 30 November 2021 while consent for SSD-7401-MOD-3 was granted by DPE on 1 April 2022.

Table 2 provides a summary of key components of the Facility as approved under SSD-7401-MOD-3.

Table 2: Summary of SSD-7401-MOD-3

ELEMENT	SSD-7401-MOD-3 SUMMARY
Use	Waste or resource management facility, specifically a resource recovery facility. Landscaping material supplies facility
Processing Capacity	Total of up to 350,000 tonnes per annum (tpa) made up of: (a) 100,000 tpa of hydro-excavation, drill muds and fluids. (b) 70,000 tpa of food and garden organics. (c) 30,000 tpa of packaged and bulk food and liquids. (d) 150,000 tpa of general solid waste, including VENM, ENM, soils, gravels, aggregates, street sweepings, clean timber, asphalt waste, cured concrete, rail ballast, and C&D waste.
Storage / sale of bulk landscape materials	Up to 40,000 tpa stored and sold (but not processed).
Site Area	Site and development footprint measures approximately 2.29 ha in area.
Hours of Operation	24 hours / day during operation.
Receival / Dispatch Area (Lower and Mid-Levels)	Single weighbridge, main administration office including staff amenities (relocated to west of site) and car parking.
Processing Plant and Equipment and existing site buildings (Lower / Mid-Levels)	Partially enclosed shed over drill mud processing plant and equipment, including truck unloading area. Shed area, 7,970m^2. Drill mud processing plant and equipment with 4 x hydro-tips and 1 x tip-pit. Bulk landscape material storage bays inside shed. Demolition of remaining site buildings.
Food de-packaging building (Upper level)	960m^2 food de-packing building.
Garden and food organics sorting building (Upper level)	2,260m^2 food and garden organics sorting building.
Garden and food organics office (Upper level)	Office with amenities located to east of Food and Garden organics sorting building.
Water storage and treatment	• Northern extent of warehouse roof space drains into drains into a 5000 L water tank. • Warehouse roof space, eastern gravel road, western and southwestern hardstand areas all drain into a sand filter system constructed using an existing inground concrete pit. The sand filter system drains through a SPEL Ecoceptor 6000 prior to draining into receiving environments. • The SPEL Ecoceptor 6000 will be located adjacent to the eastern driveway and parking spaces. The SPEL Ecoceptor 6000 measures 2720mm diameter and 3300mm depth • 73m^2 of gravel road drains directly to the SPEL Ecoceptor 6000 prior to draining into receiving environments. • 317m^2 of hardstand fronting Davis Rd and 1676m^2 of landscaping will drain into existing roadside drainage structures prior to flowing into the receiving environment.

ELEMENT	SSD-7401-MOD-3 SUMMARY
Received wastes	• Soils (ENM and VENM). • Clay/Sands/Stone/Gravels/Aggregates (VENM). • Drilling mud and/or muddy waters from hydro excavation, drilling and pot holing operations. • Garden Mixes/Top Dressings/Mulches. • Garden Organics. • Food and Garden Organics. • Solid Food Waste. • Liquid Food Waste. • Sawdust. • Spent filter sand media. • Street Sweepings. • Stormwater Waste. • Wood Waste. • Asphalt Waste (including asphalt resulting from road construction). • Building and demolition waste. • Rail Ballast.
Finished products	• Finished Products include Mine Mix, Naturaliser, BioNRich, Earth4Turf. • Clay/Sands/Stone/Gravels/Aggregates. • Engineering material as per the EPA exemption. • Liquid fraction either to sewer, to composting facility, or to another licenced facility for further processing/re-use. • Garden Mixes/Top Dressings/Mulches. • Material transferred to EPA licenced composting sites for the production of a range of growing media suitable for domestic and agricultural use. • Material transferred to EPA licenced composting sites for the production of a range of growing media suitable for domestic and agricultural use. • Liquid fraction applied to processed FOGO, composting, or sent to another licenced facility for further re-use. • Sawdust. • Component of Mine Mix, Naturaliser, BioNRich, Earth4Turf. • Washed aggregate, organics transferred to EPA licenced composting site. • Wood waste screened and re-used in particle board manufacture - unsuitable wood sent to an EPA licenced facility. • Washed aggregate for re use in recycled products.
Traffic Generation	• Up to 432 movements per day for Stage 1 and Stage 2 combined operation.
Workforce	• Up to 40-50 full-time equivalent construction jobs. Up to 25 operational jobs.

3.2 Key contact details

Table 3 lists the key contacts for the Facility.

Table 3 Resource Recovery and Recycling Facility Contact Details.

LOCATION / PERSONNEL	CONTACT DETAILS
Wetherill Park Resource Recovery and Recycling Facility	TBA
Lead Decommissioning Contractor	TBA
ReDirect Recycling	Wella Way Head Office 02 4340 9800
Emergency Spills Response	Site Supervisor (see **Section 8**)

LOCATION / PERSONNEL	CONTACT DETAILS
Complaints and Feedbacks	Environmental Manager (see **Section 8**)

Table 4 lists the contact details for the regulatory authorities that have an interest in the operations and decommissioning of the Facility.

Table 4 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
Fairfield City Council	(02) 9725 0222 mail@fairfieldcity.nsw.gov.au
SafeWork NSW **Incident notification**	13 10 50
Fire and Rescue NSW	Smithfield Fire Station (permanently staffed): 02 9493 1041 Yennora Fire Station (permanently staffed): 02 9493 1073
NSW Police and / or NSW Ambulance Service	000

4 Legislative and Statutory Framework.

4.1 Legislation

Legislation relevant to decommissioning includes:

- *Environmental Planning and Assessment Act 1979* (EP&A Act);
- *Protection of the Environment Operations Act 1997* (POEO Act);
- *Protection of the Environment Operations (General) Regulation 2021*;
- *Protection of the Environment Operations (Waste) Regulation 2014*;
- *Waste Avoidance and Resource Recovery Act 2001* (WARR Act);
- *Contaminated Land Management Act 1997*;
- *National Parks and Wildlife Act 1974;*
- *State Environmental Planning Policy (Resilience and Hazards) 2021;*
- *Biosecurity Act 2015*;
- *Biodiversity Conservation Act 2016*, and
- *Environmentally Hazardous Chemicals Act 1985*.
- *Work Health and Safety Regulation, 2011*.

Relevant provisions of the above legislation are explained in the register of legal and other requirements included in the OEMP.

4.2 Guidelines and Standards

The main guidelines, specifications and policy documents relevant to this DMP include:

- Waste Classification Guidelines Part 1: Classifying waste (NSW EPA, 2014);
- Waste Classification Guidelines Part 2: Immobilisation of waste (NSW EPA, 2014);
- Waste Reduction and Purchasing Policy 2011-2014 (WRAPP), NSW Government;
- National Environment Protection (Assessment of Site Contamination) Measure 1999 (National Environment Protection Council, April 2013).
- Australian Standard AS 2601:2001: *The Demolition of Structures*.

5 Consultation

5.1 Consultation undertaken to date

Consultation with stakeholders is particularly important during the project design, construction, and operational phases. Significant consultation was undertaken with DPE during the preparation and assessment of the SSD-7401 EIS. Following approval of SSD-7401, preparation of SSD-7401-MOD-1, SSD-7401-MOD-2 and SSD-7401-MOD-3 applications included direct consultation with DPE, who facilitated additional consultation requirements in line with the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation).

Table 5 below details the consultation undertaken to date following initial approval of SSD-7401.

Table 5: Consultation undertaken to date

RELEVANT APPROVAL	STAKEHOLDER(S)	DATE	DETAILS OF CONSULTATION
SSD-7401	DPE	18.12.2018	Meeting to discuss project, CEMP, and staging.
SSD-7401	Fairfield City Council	22.2.2019	Flood Emergency Response Plan sent to Council for feedback
SSD-7401-MOD-1	DPIE	19.9.2019	Meeting with officers from DPIE to discuss proposed modification. Main items on the meeting agenda included discussions towards relevant approval pathway and discussion of key environmental concerns.
SSD-7401-MOD-1	DPIE	7.5.2020	Phone meeting. Additional meeting regarding the proposed modification. DPIE advised that approval pathway advice by a legal entity was required (undertaken and provided in SEE) and that a Request for Secretary's Environmental Assessment Requirements (SEARs) was required.
SSD-7401-MOD-1	DPIE	17.6.2020	SEARs request lodged.
SSD-7401-MOD-1	DPIE	15.7.2020	SEARs received.
SSD-7401-MOD-1	Surrounding businesses	7.8.2020	Letter box drop of Project Factsheet to surrounding businesses
SSD-7401-MOD-1	Sydney Water	2.9.2020	Provision of Project Factsheet. No response received.
SSD-7401-MOD-1	Fairfield City Council	2.9.2020	Provision of Project Factsheet. No response received.
SSD-7401-MOD-1	NSW Fire and Rescue	2.9.2020	Provision of Project Factsheet. No response received.
SSD-7401-MOD-1	DPIE - Natural Resources Access Regulator and DPIE Water	2.9.2020	Provision of Project Factsheet. Acknowledgement of factsheet received.
SSD-7401-MOD-1	Transport for NSW	2.9.2020	Provision of Project Factsheet. Acknowledgement of factsheet received.
SSD-7401-MOD-1	NSW Environment Protection Authority	2.9.2020	Provision of Project Factsheet. No response received.
SSD-7401-MOD-1	Fairfield Council (Submission application publication)	29.9.2020 to 13.10.2020	Heavy vehicle and loading bay capacity query.
SSD-7401-MOD-1	NSW EPA (Submission application publication)	29.9.2020 to 13.10.2020	Revisions to Air Quality Impact Statement and advice that the Applicant must ensure the processed waste products identified in the SEE have a lawful reuse pathway in accordance with a resource recovery order and exemption prior to their sale
SSD-7401-MOD-1	Fire and Rescue NSW (Submission application publication)	29.9.2020 to 13.10.2020	Requested an assessment against *State Environmental Planning Policy 33 – Hazardous and Offense Development* (SEPP 33).
SSD-7401-MOD-1	Transport for NSW. WaterNSW, DPIE Water, DPIE Crown Lands	29.9.2020 to 13.10.2020	No response to DPIE publication of application
SSD-7401-MOD-1	Member of the public	29.9.2020 to 13.10.2020	Objection to SSD 7401 based on air quality.
SSD-7401-MOD-1	Nearby business	29.9.2020 to 13.10.2020	The objection raised concern regarding increased heavy vehicle traffic on Bettergrow RRF Wetherill Park Modification 1 (SSD-7401-Mod-1) | Modification

RELEVANT APPROVAL	STAKEHOLDER(S)	DATE	DETAILS OF CONSULTATION
			Assessment Report 15 Davis Road and the associated safety and dust implications. The objection also raised concerns regarding air quality, ancillary noise and the concentration of waste facilities in the area.
SSD-7401-MOD-1	Bettergrow	17.12.2020	Provided Response to Submissions (RTS) document. Additional concerns raised by Fairfield Council and the NSW EPA following release of RTS.
SSD-7401-MOD-1	Bettergrow	8.2.2021	Bettergrow clarified Fairfield Council query in relation to on-site capacity and site access from RTS.
SSD-7401-MOD-1	Bettergrow	15.2.2021	Bettergrow clarified completed dust modelling scenario. The NSW EPA amended recommended conditions following clarification.
SSD-7401-MOD-1	Bettergrow	1.3.2021	Bettergrow provided a Biodiversity Development Assessment Report for SSD-7401-Mod-1.
SSD-7401-MOD-1	NSW DPIE	21.4.2021	DPIE approval of SSD-7401-MOD-1
SSD-7401-MOD-1	NSW DPIE – Biodiversity Conservation Trust	2.6.2021	Confirmation receipt for the retirement of 2 credits of 849 - Cumberland shale plains woodland (Cumberland Plain Woodland in the Sydney Basin Bioregion).
SSD-7401-MOD-1	NSW DPIE	26.8.2021	Approval of Construction Environmental Management Plan for MOD-1
SSD-7401-MOD-2	NSW DPIE	25.8.2021	MOD-2 Submission report prepared.
SSD-7401-MOD-2	NSW DPIE	27.8.2021	DPIE support for MOD-2 submission progression (PMA-26868519).
SSD-7401-MOD-2	Davis Road Property Development Pty Ltd	3.9.2021	Landowner consent for MOD-2 application submission.
SSD-7401-MOD-2	NSW DPIE, Fairfield City Council, NSW DPIE Biodiversity Conservation Division	1.10.2021	Receipt of comments relating to SSD-7401-MOD-2 proposal.
SSD-7401-MOD-2	NSW DPIE, Fairfield City Council, NSW DPIE Biodiversity Conservation Division	29.10.2021	Response to Submissions completed.
SSD-7401-MOD-2	NSW DPIE, NSW DPIE Biodiversity Conservation Division – Environment, Energy and Science Group	19.11.2021	Receipt of additional request for information for SSD-7401-MOD-2 by NSW DPIE and NSW Biodiversity Conservation Division – Environment, Energy and Science Group
SSD-7401-MOD-2	NSW DPIE, NSW DPIE Biodiversity Conservation Division – Environment, Energy and Science Group	22.11.2021	Response letter to request for information prepared and submitted to NSW DPIE
SSD-7401-MOD-2	NSW DPIE	30.11.2021	SSD-7401-MOD-2 approved.
SSD-7401-MOD-3	Davis Road Property Development Pty Ltd	6.12.2021	Landowner consent for MOD-3 application submission.
SSD-7401-MOD-3	NSW DPE	20/12/2021	SSD-7401-MOD-3 Environmental Assessment submitted to Major Projects Website
SSD-7401-MOD-3	NSW DPE Biodiversity Conservation Division - Environment, Energy and Science Group	27/01/2022	Submission of queries regarding ecological impact and design of Landowner consent for MOD-3.
SSD-7401-MOD-3	NSW DPE	01/02/2022	DPE Response to SSD-7401-MOD-3, regarding justification for modification.
SSD-7401-MOD-3	Fairfield City Council	15/02/2022	Fairfield City Council to DPE Response to SSD-7401-MOD-3, regarding clarification around traffic management and ecology mitigation measures.
SSD-7401-MOD-3	NSW DPE Fairfield City Council NSW DPE Biodiversity Conservation Division - Environment, Energy and Science Group	21/02/2022	Response to Submissions for SSD-7401-MOD-3 submitted.

RELEVANT APPROVAL	STAKEHOLDER(S)	DATE	DETAILS OF CONSULTATION
SSD-7401 (all)	Fairfield City Council	15/02/2022 to 03/03/2022	Fairfield City Council review, requested updates and approval of Traffic Management Plan for operation of the Facility.

5.2 Consultation prior to Decommissioning Works

reDirect Recycling will conduct further consultation in the period leading up to decommissioning of the Facility. Initial consultation will occur with the landowner within 24 months of cessation of operations to clarify the extent of decommissioning works required for the Facility. This consultation will inform reDirect Recycling of landowner expectations towards the final landform of the Subject Site and further allow reDirect Recycling to contact appropriate contractors to determine the optimal methodology for decommissioning for inclusion in the updated version of this DMP.

In accordance with Condition B80, this DMP will be updated within the 12 months prior to closure of the Facility. The updated DMP will be submitted to DPE for concurrence prior to the commencement of decommissioning activities.

Within two (2) months of the commencement of decommissioning works, reDirect Recycling will contact the properties outlined in **Table 6** via phone call / door knock to advise of the upcoming decommissioning works. In addition, a Project Factsheet will be distributed to the properties outlined in **Table 6** approximately seven (7) days prior to the commencement of decommissioning works to reiterate the messages outlined in the prior phone call / conversation.

In addition to the above, Fairfield City Council and the NSW Environment Protection Authority (EPA) will be notified of the upcoming decommissioning works via email, to occur approximately two (2) weeks prior to the commencement of decommissioning works.

Delivery of the above consultation will include the following items:

- Brief outline of proposed works scope and methodology.
- Outline of the commencement date and expected duration of decommissioning works.
- Brief summary of expected impacts (e.g. traffic generation, noise) and mitigation measures to be applied.
- Contact details of the Project Manager for complaints and / or comments.

Table 6: Neighbouring properties

NEIGHBOURING PROPERTIES		
BUSINESS	**ADDRESS**	**CONTACT NUMBER / CONTACT METHOD**
Infrabuild Recycling	23 Davis Rd	(02) 9203 1611
National Lift Trucks Pty Ltd	25 Davis Rd	0414 287 008
Industrial premises - unknown	17 Davis Rd	Door knock
FlameStop Australia Western Sydney	16 Davis Rd	(02) 9725 3322
Austasia Packaging	15 Davis Rd	(02) 9725 1168
Industrial premises - unknown	15A Davis Rd	Door knock
Industrial units	14 Davis Rd	Door knock
DSY Auto Group	1/14 Davis Rd	0452 636 363
Dan & Co Eatery	14 Davis Rd	0492 832 473
Genneral Staircase	12b/13 Davis Rd	(02) 9609 7777
P&H Jennings Heavy Machinery Glass	12A Davis Rd	(02) 9725 4774
El Toro Smash Repair Centre	1/11 Davis Rd	(02) 9725 2960
Safeman Australia	25a Davis Rd	(02) 9609 7960
Adaptive Interiors	2 Arnott Pl	1800 064 474
Master Nuts Pty-Ltd	3 Arnott Pl	Door knock
Balun Extra	4 Arnott Pl	Door knock

NEIGHBOURING PROPERTIES		
BUSINESS	**ADDRESS**	**CONTACT NUMBER / CONTACT METHOD**
Fortus	5 Arnott Pl	(02) 8524 2008
Reliable Powder Coating	6A Arnott Pl	(02) 9609 7157
Industrial premises - unknown	7 Arnott Pl	Door knock
Field Furnace Refractories Pty Ltd	8 Arnott Pl	(02) 9729 1799
Industrial unit	8b Arnott Pl	(02) 9729 1799

5.3 Consultation available during Decommissioning

The following information will be posted on the security fence of the subject site throughout the duration of decommissioning works to provide an avenue of contact for community complaints:

- Outline of works (Resource Recovery & Recycling Facility Decommissioning).
- Lead Decommissioning Contractor company name.
- Project Manager name.
- Complaints number and email.
- Expected duration of works.

See **Section 10.2** for an outline of the complaint management process for the decommissioning of the Facility. A Complaint Registration Form is attached to this Conceptual DMP as **Attachment 2**.

6 Operational Life of the Facility

The final operation life of the Facility will be dependent on the period of the lease between Davis Road Property Development and Bettergrow. While specific details of the lease agreement are confidential between the two parties it can be reported that the current lease will expire in 2030 (8 years post DMP preparation), with extension options allowing for handover to occur up to 2038 if agreed upon between respective parties. As such, the operational life of the Facility is currently expected to be a minimum sixteen (16) years, with potential to operate beyond this period.

The preceding paragraph does not provide a commitment that the Facility will operate, whether in its current form or as a whole, for the entire lease period between Davis Road Property Development and Bettergrow. While this is currently the case, future internal and external factors may result in modification or early closure of the Facility. Compliance with Schedule 2, Condition B80 of SSD-7401 (review of this DMP one-year prior to closure to the satisfaction of DPE) will allow for adequate capture of the decommissioning process for the Facility.

7 Decommissioning Schedule

The following subsections provide a preliminary outline of the decommissioning process for the Facility. The scope of decommissioning works will be clarified and expanded upon under the scheduled review to this DMP under Schedule 2, Condition B80 of SSD-7401.

Considering the above, the following subsections do not discuss specific methodology to be undertaken during decommissioning, rather they provide a high-level overview of the works to be undertaken. This is due to the fact the Facility will operate subject to a 12 - 20 year lease period and will likely be subject to design modifications and / or modified statutory obligations from the date of commencement of operation to the revision period of this DMP.

Early termination of the existing lease would impact upon the timeframes discussed in the following subsections. reDirect Recycling will endeavour to maintain the minimum timeframes stipulated below to allow for suitable consultation to occur prior to decommissioning in the event of early termination of the subject site lease period.

7.1 Landholder Consultation – Scope of Works

reDirect Recycling will consult with Davis Road Property Development and Bettergrow within 2 years prior to the cessation of the current lease. This will allow for either an agreement in principle for the extension of the lease or for a clarification of the expected final landform of the subject site following decommissioning works onsite, noting that Davis Road Property Development (as the landowner) may acquire site structures and amenities as part of the lease agreement.

7.2 Public Infrastructure Repair

reDirect Recycling will engage a suitably qualified consultant / engineer to prepare a dilapidation survey within 6 months of cessation of operations. The intent of the dilapidation survey will be to identify public infrastructure damaged during the operation of the Facility, in-line with Schedule 2, Condition A28 of the SSD-7401 Consolidated COA. Damaged infrastructure that can be solely attributed to the operation of the Facility will be repaired in consultation with Fairfield City Council.

The intent of the final dilapidation survey is not to absolve reDirect Recycling of ongoing repair work that may be required throughout the duration of operation of the Facility. Repair of public infrastructure damaged as a result of Facility will be repaired as required under the SSD-7401 Consolidated COA by reDirect Recycling during operation.

7.3 Cessation of Operation

Formal decommissioning of the Facility will commence with the following actions:

- Cessation of external material acceptance to the Facility. **Third-party companies that utilise the Facility on a regular basis will be notified of the period (and specific date if known) that site deliveries will cease at least 6-months prior to cessation in order to negatively impact upon their operation as much as possible.**
- Processing of final material following cessation of deliveries. reDirect Recycling will endeavour to schedule an equal number of deliveries with quantum of material to be processed to minimize leftover material onsite.
- Additional material will be transported to a facility licenced to accept the material, either owned / managed by reDirect Recycling or following agreement between reDirect Recycling and a suitable third party.

7.4 Decommissioning Hours

In accordance with Condition B57, decommissioning works will be undertaken within the following timeframes:

- Monday to Friday – 7am to 6pm.
- Saturday – 8am to 1 pm.
- Sunday – no works permitted.

Condition B58 allows for the works listed below to occur outside the hours specified above:

- Works that are inaudible at the nearest sensitive receivers.
- Works agreed to in writing by the Secretary.
- For the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or where it is required in an emergency to avoid the loss of lives, property and /or prevent environmental harm.

7.5 Decommissioning Staff

The anticipated number of workers on site will be up to a maximum of 20 people at any one time. Of these workers, it is expected that the majority of the workforce will be sourced from the local area. Any non-local specialised contractors are likely to come from across other areas of NSW.

7.6 Decommissioning Facilities and Amenities

It is expected that current site facilities and amenities will be retained onsite for future land-use. However, in the event that site amenities are to be removed as part of decommissioning activities, these will be removed last to preserve their use for workers onsite wherever possible. A portable site office, serving as an office, lunchroom and first aid room will be installed onsite if removal of existing facilities are required prior to the completion of decommissioning or rehabilitation works onsite. In addition, portable ablution facilities will be temporarily installed onsite for the duration of decommissioning works if current facilities are to be removed. Portable ablution facilities will be serviced by a suitably licenced external contractor.

7.7 Decommissioning Plant & Equipment

The following plant and equipment may be utilised during decommissioning activities:

- Truck and dog for the delivery of materials for rehabilitation (where required) and removal of waste, materials for recycling and / or reuse.
- Fixed rigid trucks for the transport of materials.
- 1 x excavator for earthworks, if required for site stabilisation.
- 1 x front end loader for the movement of materials.
- 1 x water cart for dust suppression.
- 1 x street sweeper for the management of potential soil deposited on internal driveways (if ground disturbance works are required).
- 1 x crane for the lifting of loads, dismantling of steel, and movement of heavy plant.
- 1 x portable generator for temporary site power (if required).
- Hand power tools and equipment.

Additional plant and equipment may be required dependant on the final scope of works. This will be determined in collaboration with the landowner.

7.8 Decommissioning Works

The below subsections provide a preliminary overview of decommissioning works to be undertaken onsite. The exact scope of works will be clarified during the schedule review of this DMP, with this section to be updated accordingly.

All demolition works will be conducted in accordance with *Australian Standard AS 2601:2001: The Demolition of Structures*, or its latest version.

7.8.1 Equipment Cleaning and Testing

Following the final processing, site equipment will be thoroughly cleaned of any oily waste and potential residue from operation. Equipment will be assessed as to whether it is suitable for re-use prior to use on another licenced reDirect Recycling site or third-party premises.

7.8.2 Disconnection of Services

Decommissioning works will commence with the isolation and disconnection of all services, including water, power, and sewer where relevant. The current stormwater system will be maintained throughout the duration of decommissioning to aid in the management of surface water run-off.

7.8.3 Site Preparation

Site preparation will include the following items:

- Removal of ancillary equipment not required for decommissioning and / or rehabilitation works.
- Installation of appropriate Erosion and Sediment Control (ESC) devices to manage potential surface water run-off. The scale of ESCs required will be dependent on the final scope of decommissioning and rehabilitation works required onsite, with appropriate ESC (e.g. coir log, sediment fence) installed downslope of ground disturbance works prior to commencement.

- ESC will be installed in accordance with an **Erosion and Sediment Control Plan (ESCP)** for the decommissioning and rehabilitation works, to be prepared in accordance with the Landcom (2004) guideline *Managing Urban Stormwater – Soils and Construction* (the Blue Book) prior to commencement of decommissioning and / or rehabilitation works onsite.

7.8.4 Dismantling Procedure

7.8.4.1 Site Equipment

Site equipment (e.g. drill muds processing machinery) will be dismantled prior to surrounding infrastructure wherever possible. The retention of surrounding infrastructure will mitigate potential noise and visual impacts from the dismantling process to surrounding receivers.

Waste classification and management will occur as outlined under **Section 7.9** below. Material transport will occur as outlined in **Section 7.10**.

7.8.4.2 Soft Stripping

Soft strip demolition is the process of removing non-structural elements of buildings, which may include removal of fixtures and fittings, internal walls, internal ceilings, floors, temporary structures, mechanical and electrical services including ventilation and air conditioning systems, lighting, cables, heating, and utilities. Soft stripping will occur following the removal of internal machinery. External walls and roofing will be removed last due to the inherent noise / visual barrier they present, coupled with the ability for all-weather works when inside the Facility structure.

Waste classification and management will occur as outlined under **Section 7.9** below. Material transport will occur as outlined in **Section 7.10**.

7.8.4.3 Site Infrastructure

Removal of site infrastructure will generally occur in the following manner (where required):

- Removal of corrugated roofing and wall cladding.
- Removal of timber beams and purlins.
- Removal of structural steel supports and framing.
- Removal of concrete slabs and footings.
- Removal of steel reinforcing.
- Testing of soil and removal of any contaminated materials in accordance with EPA requirements.

7.9 Waste Management

7.9.1 Decommissioning Waste Management Plan

Establishment of the final scope of works required for decommissioning and rehabilitation of the Facility will include the preparation of a **Decommissioning Waste Management Plan** that will include the following items:

- Identification of waste streams, including materials that may be reused or recycled.
- Estimation of the quantum of materials and / or waste generated via decommissioning.
- Nomination of waste destinations.
- Estimation of heavy vehicle movements attributed to machinery floats and material / waste transport.
- Delineation of temporary waste storage areas onsite.
- Description of environmental controls to be applied to mitigate impacts associated with temporary waste storage and transport.
- Identify waste monitoring and reporting requirements during decommissioning.

7.9.2 Waste Segregation

Waste separation and segregation will be promoted on-site to facilitate reuse and recycling as a priority of the waste management program as follows:

- Waste segregation onsite – Waste materials will be separated onsite into dedicated bins/areas for either reuse onsite or collection by a waste contractor and transport to offsite facilities; and
- Waste separation offsite – Wastes to be deposited into one bin where space is not available for placement of multiple bins, and the waste is to be sorted offsite by a waste contractor.

Where materials cannot be reused and recycled, all waste would be handled and disposed in accordance with the *Protection of the Environment Operations Act 1997*.

7.9.3 Waste Handling and Storage

Where waste is required to be handled and stored onsite prior to onsite reuse or offsite recycling/disposal, the following measures apply:

- Liquid wastes - to be stored in appropriate containers in bunded areas until transported offsite. Bunded areas will have the capacity to hold 110 per cent of the liquid waste volume for bulk storage or 120 per cent of the volume of the largest container for smaller packaged storage.
- All other recyclable or non-recyclable wastes - to be stored in appropriate covered receptacles (e.g. bins or skips) in appropriate locations onsite and contractors commissioned to regularly remove/empty the bins to approved disposal or recycling facilities.

7.9.4 Waste Classification Procedure

Where waste cannot be avoided, reused or recycled it will be classified and appropriate disposal will then occur. The classification of waste is undertaken in accordance with the EPA's *Waste Classification Guidelines Part 1: Classifying Waste* (2014). This document identifies six classes of waste: Special, Liquid, Hazardous, Restricted Solid, General Solid (putrescible) and General Solid (non-putrescible) and describes a six-step process to classifying waste. That process is described below:

Step 1: Is it 'special waste'?

Establish if the waste should be classified as special waste. Special wastes include clinical and related, asbestos, waste tyres. Definitions are provided in the guidelines.

Note: Asbestos and clinical wastes must be managed in accordance with the requirements of Part 7 and Clause 113 of the Protection of the Environment Operations (Waste) Regulation 2014.

Step 2: If not special, is it 'liquid waste'?

If it is established that the waste is not special waste it must be decided whether it is 'liquid waste'. Liquid waste means any waste that: has an angle of repose of less than 5° above horizontal becomes free flowing at or below 60° Celsius or when it is transported is generally not capable of being picked up by a spade or shovel.

Liquid wastes are sub-classified into:

- Sewer and stormwater effluent,
- Trackable liquid waste, being category 1 trackable waste and wastes stated under the *Protection of the Environment Operations (Waste) Regulation 2014, Schedule 1 Waste to which waste tracking requirements apply*; and
- Non-trackable liquid waste.

Step 3: If not liquid, has the waste already been pre-classified by the NSW EPA?

The EPA has pre-classified several commonly generated wastes in the categories of hazardous, general solid waste (putrescibles) and general solid waste (non-putrescibles). If a waste is listed as 'pre-classified', no further assessment is required.

Step 4: If not pre-classified, is the waste hazardous?

If the waste is not special waste (other than asbestos waste), liquid waste or pre-classified, establish if it has certain hazardous characteristics and can therefore be classified as hazardous waste.

Hazardous waste includes items such as explosives, flammable solids, substances liable to spontaneous combustion, oxidizing agents, toxic substances and corrosive substances.

Step 5: If the waste does not have hazardous characteristics, undertake chemical assessment to determine classification.

If the waste does not possess hazardous characteristics, it needs to be chemically assessed to determine whether it is hazardous, restricted solid or general solid waste (putrescible and non-putrescible). If the waste is not chemically assessed, it must be treated as hazardous.

Waste is assessed by comparing Specific Contaminant Concentrations (SCC) of each chemical contaminant, and where required the leachable concentration using the Toxicity Characteristics Leaching Procedure (TCLP), against Contaminant Thresholds (CT).

Step 6: Is the general solid waste putrescible or non-putrescible?

If the waste is chemically assessed as general solid waste, a further assessment is available to determine whether the waste is putrescible or non-putrescible. The assessment determines whether the waste is capable of significant biological transformation. If this assessment is not undertaken, the waste must be managed as general solid waste (putrescible).

7.9.5 Waste Disposal

Waste disposal is to be in accordance with the *Protection of the Environment Operations Act 1997* and the *Waste Avoidance and Resource Recovery Act 2001*. Wastes that are unable to be reused or recycled will be disposed of offsite to an EPA approved waste management facility following classification.

Where possible wastes will be removed off-site to a recycling facility or will be disposed of at a licensed waste facility. Waste contractors and licensed waste management facilities that may be available for offsite waste disposal are included in **Table 7**. Details of waste types, volumes and destinations are to be recorded in the Waste Tracking Register in **Attachment 3**.

Table 7: Waste contractors and licenced facilities

OPERATOR / OWNER	DETAILS	CONTACT DETAILS	WASTE ACCEPTED
SUEZ	Transfer station	20 Davis Road, Wetherill Park, NSW Ph. 02 9609 3377	Batteries, asbestos, paper and cardboard, E-waste, garden and food waste, gas bottles, hazardous waste, metal, mixed putrescible, non-putrescible, plastic, white goods, and wood waste
Veolia	Resource recovery and landfill	752/716 Wallgrove Road, Horsley Park, NSW Ph. 132 955	General solid non-putrescible waste, including concrete, soils, timber and steel.
Boral	Resource recovery facility	39A Widemere Road, Wetherill Park, NSW Ph. 02 9604 9101	Separation, crushing, and blending of recovered construction and demolition (C&D) wastes.
Cleanaway	Transfer station and landfill	85-87 Quarry Road, Erskine Park, NSW Ph. 131 339	Commercial and industrial, general solid waste (non-putrescible), general solid waste soils (special asbestos), low level contaminated soils (LLCS), construction and demolition waste (C&D Waste) excluding asbestos, and clean fill (ENM/VENM).

7.10 Transportation

Vehicle movements during decommissioning will be conducted as outlined under the Facility operational **Traffic Management Plan** (TMP), prepared by Pavey Consulting Services (PCS) in accordance with Condition C7 of the SSD-7401 Consolidated COA. This TMP will be updated to reflect decommissioning works prior to the commencement of decommissioning (no construction TMP required for SSD-7401). The TMP includes a detailed plan outlining heavy vehicle movement onsite and a driver code of conduct, which must be adhered to by all personnel engaged to work onsite. These documents will be updated alongside the operational TMP to address decommissioning and rehabilitation works onsite.

The updated TMP will be included as an Attachment to the updated DMP as part of the review process required under Schedule 2, Condition B80 of SSD-7401.

See **Section 11** for mitigation and management measures to be applied during decommissioning and / or rehabilitation works onsite.

7.11 Public Safety

The subject site is currently secured by a chain link fence. This fence will be maintained or replaced by temporary hoarding (subject to landowner discretion) to prevent accidental intrusion into the subject site during decommissioning or rehabilitation works.

The Facility's Operational Traffic Management Plan will be updated to address decommissioning and rehabilitation works and will include a Drivers Code of Conduct to outline safety measures that must be undertaken by all personnel when working onsite and highlight the importance for following road rules when travelling to and from the facility.

All personnel involved in decommissioning or rehabilitation works onsite will be required to complete a site induction prior to commencement of works (see **Section 9.1**). The site induction will provide an overview of the updated Traffic Management

Plan and Drivers Code of Conduct as well as outlining important safety measures to be implemented to prevent vehicle / machinery and pedestrian incidents.

Site safety will be managed by the Decommissioning Manager in accordance with relevant Work Health and Safety requirements.

7.12 Rehabilitation

As previously discussed, SEPP 55 was repealed and replaced by the Resilience and Hazards SEPP on 1 March 2022.

7.12.1 Current Site Condition

7.12.1.1 Contamination

A targeted site investigation for contamination was undertaken at the site in 2017 by Douglas Partners as part of the Response to Submissions (RTS) for the 2016 Environmental Impact Statement (EIS) (refer Appendix 5, Response to Submissions, prepared by RPS, 2017). The purpose of the investigation was to determine if there was any existing contamination at the site that required further remediation (and if a Remediation Action Plan is required).

The field and analytical results of the investigation determined that there was no contamination warranting remediation (despite the detected concentrations of metals, PAH and TRH in soil) and, therefore, a Remediation Action Plan was not required for the proposed development. Residual TRH in soil at the site was not considered high enough to not pose a risk to terrestrial ecology, human health, or groundwater based on new and previous investigation results. Based on the findings of the investigation and a review of previous investigation results, it was considered that the site was suitable for the construction and operation of the development.

7.12.1.2 Biodiversity

Vegetation located in the subject site has been identified by MJD Environmental Pty limited (MJD Environmental) under the SSD-7401-MOD-1 Biodiversity Development Assessment Report (BDAR) (2021) as Plant Community Type (PCT) Number 849 (PCT 849) *Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion* that is commensurate with *the Cumberland Plain Woodland in the Sydney Basin Bioregion Ecological Community*, listed as a Critically Endangered Ecological Community (CEEC) under both the *NSW Biodiversity Conservation Act 2016* (BC Act) and the Commonwealth Environment *Protection and Biodiversity Conservation Act 1999* (EPBC Act). This CEEC has also been identified as a candidate Serious and Irreversible Impact (SAII).

The MJD BDAR (2021) did not locate any hollow-bearing trees within the extent of vegetation onsite, with an absence of ground habitat (e.g. hollow logs) due to past maintenance of the vegetation onsite.

Following approval of SSD-7401-MOD-3, construction of the Facility:

- Required the removal of approximately 0.070 ha of CEEC vegetation.
- Retains approximately 0.078 ha of CEEC vegetation.
- Required the retirement of 2 ecosystem credits under the NSW Biodiversity Offset Scheme (issued under SSD-7401-MOD-1).

Operation of the Facility will not require intrusion into retained vegetation onsite, while the operational stormwater management system has been put in place to prevent run-off from the development footprint entering retained vegetation parcels.

7.12.2 Proposed Rehabilitation Works

The following subsection provide an early scope of works for managing potential contamination of biodiversity impacts during decommissioning of the Facility. See **Section 11** for additional mitigation and management measures to be applied during decommissioning and / or rehabilitation works onsite.

7.12.2.1 Contamination

It is expected that areas sealed for construction of the Facility will be retained following completion of operation. As such, no remediation of these areas is expected to be required. Existing drainage is directed towards the stormwater management system, with this system also expected to be retained following completion of operation as a site “service”.

Where an environment incident (see **Section 10.1**) occurs with potential to result in contamination (e.g. fuel spill within unsealed area), sampling of potentially contaminated soils will be undertaken in accordance with relevant legislation (e.g. *Contaminated Land Management Act 1997*) and statutory guidelines (e.g. NSW EPA Sampling Design Guidelines). This will occur upon identification of the possible contamination, not during the decommissioning phase of development (unless

identified at that time). Appropriate remediation will be undertaken as required under the *Contaminated Land Management Act 1997* and Chapter 4 of the Resilience and Hazards SEPP.

Construction of the Facility included the implementation of a **Contamination Unexpected Finds Protocol**. The **Contamination Unexpected Finds Protocol** will be updated and implemented during decommissioning and rehabilitation to address potential unexpected contamination occurrence onsite in the event that any ground disturbance works are proposed.

In general, in the case that signs of contamination (other than asbestos) such as odours and staining of soils are encountered during site works, the following general unexpected finds protocol will apply:

- A qualified environmental consultant will inspect the potential Area of Environmental Concern (AEC) and determine the nature of the issue, whether it comprises an AEC, and the appropriate approach to assessing or (if appropriate) managing the issue.
- The environmental consultant will undertake an assessment considered necessary to determine the management strategy for the AEC.
- If contamination is found and remediation action is considered necessary, a remediation strategy for the AEC will be prepared by the environmental consultant. The remediation strategy is to be implemented by a qualified contractor.
- Any remediation works are to be validated by the environmental consultant and documented in a validation report.

7.12.2.2 Biodiversity

Retained vegetation parcels will be designated as 'no-go' zones through the duration of decommissioning works. Where risk of entry by site personnel is possible, retained vegetation parcels will be delineated using flag bunting (or similar) to prevent accidental intrusion.

No impact to retained vegetation parcels is expected during operation, however the following process will be applied to rehabilitate any vegetated areas inadvertently impacted during operation or decommissioning of the facility:

- Any compacted ground will be ripped and blended to aerate surface soils and prevent ponding,
- Exposed soils will be seeded with grass species endemic to Cumberland Plain Woodland prior to being stabilized using suitable biodegradable erosion control (e.g. jute mesh or coir blanket) where there is risk of surface erosion,
- Native grass seed mix will contain no less than 10 species and must comprise at least 20% Kangaroo Grass (*Themeda triandra*),
- In the event that the adverse impact to retained vegetation can be quantified by a specific number of trees and / or shrubs removed, notification to DPE of the number of trees / shrubs will occur as per the SSD-7401 Consolidated COA and compensatory planting will occur on a 2:1 ratio (planting to removed),
- DPE will be notified of the approximate footprint of intrusion in the event impacts cannot be quantified to a specific number of trees and / or shrubs,
- Compensatory planting will occur for vegetation impact outside the approved development footprint,
- If the species of tree / shrub impacted is known, the same species will be sourced for compensatory planting wherever possible. If it is not possible to source the same species as that removed, then another species endemic to Cumberland Plain Woodland of the same growth form will be sourced for compensatory planting,
- Wherever possible, *Eucalyptus moluccana* (Grey Box), *Eucalyptus tereticornis* (Forest Red Gum) and *Corymbia maculata* (Spotted Gum) will be sourced for tree replacement works where the species of tree removed / impacted is not known, and
- Tree spacing will be dependent on compensatory planting species, with an average spacing of 7-10m for overstorey (Eucalypt) trees, 5m for midstorey (Acacia) trees and 1-2m for shrubs. Tree planting will occur as follows:
    - Where possible, planting shall use advanced and established local native trees with a minimum plant container pot size of 100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pregrown from provenance seed,
    - In event that larger trees are not able to be sourced, tubestock of vegetation will be used for compensatory planting, and
    - Plantings will be stabilised using stakes (or similar) during installation.
- Compensatory planting will be watered as per the environmental conditions, with minimum weekly plantings (unless >25mm rainfall experienced). Watering will continue until the compensatory vegetation is satisfactorily establishment and stable,
- Tree supports (e.g. stakes) will be removed 1-2 months following installation, unless sapling growth is clearly established and the supports present a possible obstacle to further stabilisation and growth, and
- Compensatory planting that fails to establish will be replaced on a 1:1 ratio.

Despite the extremely low possibility of occurring, in the event that accidental intrusion into protected vegetation impacts upon potential fauna habitat the following compensatory actions will be undertaken:

- Hollows, where they occur, will be sectioned from the main tree for potential reuse as compensatory habitat,
- Hollows will be repurposed and installed as aerial habitat wherever possible. Where hollows are of unsuitable shape for installation, they will be maintained as ground habitat and a nest box with similar opening aperture will be purchased and installed on a nearby host tree,
- Compensatory hollows / nest boxes will be installed at minimum 3m height, facing north to north-east wherever possible, and
- Hollows / nest boxes installed on host trees will be attached using a wire covered in hose (or similar) to prevent damage to the host tree.

No removal of trees will occur during decommissioning works. In unlikely event impacts to retained vegetation is required, the Decommissioning Manager is to contact the Project Manager and the necessary approvals (e.g. development application, modification to SSD-7401) will be sought as required.

8 Roles & Responsibilities

All staff and contractors have an obligation to implement the requirements of this DMP. 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 8**.

Table 8 Roles and Responsibilities

ROLE	RESPONSIBILITY
Project Manager (reDirect Recycling)	• Ensure all works comply with relevant regulatory and Project requirements; • Development, implementation, monitoring and updating of the OEMP, DMP and relevant subplans; • Ensure the requirements of the OEMP, this DMP and supporting plans 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 the OEMP, this DMP and supporting documentation; • Provide adequate resources (personnel, financial and technological) to ensure effective development, implementation and maintenance of the OEMP and this DMP as applicable; • Ensure that all personnel receive appropriate induction training, including details of the environmental and community requirements; • Obtain and update all environmental licences, approvals and permits as required; • Maintain complaints register; and • Lead liaison with regulatory authorities; and • Stop work immediately where there is an actual or potential risk of harm to the environment.
Decommissioning Manager (External Company)	• Overall responsibility for the management of environmental aspects of the Project; • Notify the Project Manager where any works may require a modification to the approved works and or development footprint under SSD-7401. • Ensure regular compliance auditing is being undertaken; • Ensure site monitoring is being undertaken as per the OEMP, this DMP, sub-plans and as per statutory requirements; • Emergency contact during decommissioning and rehabilitation; • Responsible for the engagement of additional contractors as required, unless stipulated otherwise by Project Manager; • Designated Chief Flood Warden under Flood Emergency Response Plan (unless otherwise delegated); • During operation, is responsible for delegating roles onsite, such as Deputy Chief Flood Warden, First Aid Officers and Flood Warden. • 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 that complaints are investigated, and issues raised resolved; • Communicate all complaints with the Project Manager; • Ensure environmental management procedures and protection measures are implemented; • Ensure environmental protocols are in place and managed; • Ensure environmental compliance; • Ensure all Project personnel attend an induction prior to commencing works; and

ROLE	RESPONSIBILITY
	• Stop work immediately where there is an actual or potential risk of harm to the environment Manage environmental document control, reporting, inductions and training; • Stop activities where there is actual or potential risk of harm to the environment or to prevent an environmental non-conformance.
Environmental Manager (External Company)	• Assist in ensuring management plans remain relevant to current works onsite and are updated as required. • Comply with the requirements of the OEMP, this DMP and relevant sub-plans as relevant to works; • Maintaining site records related to the implementation of management plans; • Undertake site inspections, carry out monitoring activities and complete reporting; • Ensuring compliance with environmental legislation, regulations, permits, approvals etc; • Provide copies of relevant management plans 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 Decommissioning 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	• Comply with the requirements of all management plans, the Project Manager, the Decommissioning Manager and Environmental Manager; • 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

8.1 Communication Protocols

Communication protocols have been established for the Facility and are included in the relevant sections of this DMP to ensure information regarding environmental issues and controls are distributed effectively amongst relevant personnel both internal and external to the Facility. The Project Manager will be responsible for the timing and effectiveness of all communications. Communication with the community will be undertaken as required by the Project Manager, Decommissioning and / or Environmental Manager (as determined by the Project Manager).

Key Project contacts are provided in **Table 9**. Please note, all contacts are left blank at this stage and will be determined during the preparation of the revised DMP required under the SSD 7401 Consolidated COA.

Table 9 Key Contacts

POSITION	NAME	CONTACT NUMBER
Project Manager	TBA	TBA
Decommissioning Manager	TBA	TBA
Environmental Manager	TBA	TBA

9 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 DMP will take place initially through a site induction and then on an on-going basis through "toolbox talks" (or similar).

9.1 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 the facility OEMP and this DMP including purpose and objectives.
- Overview of sub-plans of the facility OEMP and this DMP, including specific requirements relating to personnel onsite.
- Key environmental issues.
- Environmental licenses, 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 10.2**.
- Appropriate response and management of environmental incidents in accordance with the strategy detailed in Section 6 of the Facility OEMP and this DMP.

9.2 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 Decommissioning Manager. 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 the OEMP.
- Pollution incident response management plan.

9.3 General Environmental Awareness

All employees and contractor personnel shall receive Environmental Awareness training. The General Environmental Awareness Training program shall include the following:

- The Bettergrow Environmental Policy (See **Attachment 5**).
- Sensitive environments (e.g. surface water, vegetation, etc) and neighbours around their work area.
- Significant Environmental Activities.
- Site Legal and other requirements.
- Management plan non-conformance reporting requirements.

9.4 Tool-box Talks

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

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

- Work hours.
- Waste management.
- Spill control.
- Environmental exclusion areas.
- Environmental incidents.
- Predicted weather and associated hazards (e.g. flooding, high winds, bushfire).

9.5 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 by the Decommissioning Manager using the form provided in **Attachment 3**.

Completed hard-copies of forms will be maintained onsite, with digital / scanned copies sent to reDirect Recycling for storage on the online project management system *DataStation*. ReDirect Recycling will maintain an internal management system within the *DataStation* for the facility.

9.6 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.
- Changes in regulations.
- Equipment upgrades or changes in equipment.
- Errors or deficiencies in job performance.
- Errors in data reporting.

10 Incidents and Complaints

10.1 Incident Management

The management of environmental incidents, including potential pollution incidents, will be undertaken as outlined under Section 6.2 of the Facility OEMP.

Incident reporting will occur as outlined under Section 6.2.2 of the Facility OEMP. In accordance with Condition C10 of SSD-7401, **within 24 hours of 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 14 days after the incident or potential incident.

Relevant emergency contacts are listed in **Table 10**.

Table 10 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

10.2 Complaint Management

The process for managing complaints received from the community and stakeholders will be generally undertaken as follows:

- Complaint received at the site during decommissioning works.
- The complaint is referred to the Operations Manager or Environmental Representative.
- Details of the complaint are to be registered as follows:
    - date and time of the complaint;
    - the methods by which the complaint was made;
    - the contact details of the complainant or enquirer (if no details were provided a note to that effect);
    - the nature of the complaint;
    - any action(s) taken in relation to the complaint, including timeframes for implementing the action;
    - if no action was taken in relation to the complaint, the reason(s) why no action was taken; and
    - follow up and close off date for complaint.
- Investigation of the complaint will be undertaken by the Operations Manager or the Environmental Representative as delegated.
- All complaints will be addressed as soon as possible or within 48 hours of receiving the complaint.
- The complainant will be notified of the outcome of the complaint.

A Complaint Registration Form is attached to this Conceptual DMP as **Attachment 2**.

reDirect Recycling will be notified of all complaints in relation to the decommissioning of the Facility. All complaints received, including a summary of the complaint and action undertaken, will be added to the operational reDirect Recycling complaints register. Complaint records will be kept for at least 4 years after the complaint was made. The record will be produced to any authorised officer of the EPA who asks to see them.

11 Mitigation Measures

Table 11 provides mitigation measures to be applied during the decommissioning and rehabilitation of the Facility. These mitigation measures are to be applied in addition to those stipulated in other Sections of this DMP. It should be noted that several of the mitigation measures listed in **Table 11** will be enacted during the operation of the Facility and then continued into the decommissioning and rehabilitation phase of SSD-7401.

Table 11: Mitigation measures to be applied under this DMP

MITIGATION MEASURES	

General	• All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.
	• All demolition works will be conducted in accordance with *Australian Standard AS 2601:2001: The Demolition of Structures*, or its latest version.
	• The following sub-plans will be prepared / updated as required to support the final DMP and be applied during the period of decommissioning and rehabilitation works (unless determined otherwise in consultation with DPE):
	  ○ Decommissioning Traffic Management Plan (including Drivers Code of Conduct).
	  ○ Decommissioning Waste Management Plan.
	  ○ Erosion and Sediment Control Plan.
	  ○ Unexpected Finds Protocol.
	  ○ Emergency Response Plan.
	  ○ Remediation Action Plan (if required for contamination).

Public Safety	• Site induction will include an outline of the importance for following all public road rules. • The importance of following internal safety measures and external road rules will be reinforced through decommissioning and rehabilitation toolbox talks. • All decommissioning personnel will be required to complete a site induction and daily toolbox talks when working onsite. The scope of works and controls should be reviewed by personnel each time they commence a new task. • The subject site is bounded by a chained by a chain link fence topped by barbed wire to protect against accidental intrusion. This fence will be maintained or replaced if damaged. A similar design may be used in lieu of the current fence design. • If the landowner requires the fence removed, temporary hoarding fence will replace sections of removed fence throughout decommissioning and rehabilitation works onsite. • Site gates will be closed and locked when no works are being undertaken onsite. • Site safety will be managed by the Decommissioning Manager in accordance with relevant Work Health and Safety requirements.
Biodiversity	• All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development. • Equipment and vehicles entering the Subject Site for decommissioning and rehabilitation purposes are cleaned of foreign soil and seed prior to entering the Subject site. • All machinery is correctly maintained and operator as per operation manual. • Erosion and sediment controls enacted as per ESCP to limit impacts on retained vegetation. • Implementing slow speed limits for vehicles entering and exiting the Subject Site. No construction works to occur from dusk till dawn. • Supplement ground cover native plant species within the patch using a single application of native grass and herb seed mix. The seed mix is to contain no less than 10 species and must comprise at least 20% Kangaroo Grass (*Themeda triandra*); • Installation of perimeter sediment and erosion control fencing to prevent ingress of sediment laden water andweed propagules into the area of native vegetation; • Exclude all machinery and human activity from the patch of Cumberland Plain Woodland CEEC; • Install a barrier (e.g. flag bunting) delineating vegetation ‘no-go’ zones to prevent accidental intrusion by site personnel during decommissioning works onsite. • No impacts to retained vegetation parcels are permitted. • In the unlikely impact that tree removal is unavoidable, works will stop until DPE approval for vegetation impacts is obtained.

MITIGATION MEASURES	

	• Details provided to DPE will include the number of trees requiring removal, reason for removal and an outline of compensatory planting to be undertaken. A footprint will be provided in the event that an exact number of trees / shrubs impact is not known.
	• (If required) Where excavation works have potential for impacts to nearby trees, works will be undertaken under the supervision of an Australian Qualification Framework (AQF) Level 5 Arborist, acting in accordance with AS 4970-2009.
	• Where vegetation removal occurs, the supervising Arborist will record the following details for each tree to be removed:
	  ○ Species.
	  ○ DBH.
	  ○ Presence of hollows (noting no hollows were identified within the extent of the CPW onsite under the SSD-7401-MOD-1 Biodiversity Development Assessment Report by MJD Environmental, 2021).
	  ○ Reason for removal.
	• Trees will be removed with the intent of reducing surrounding ground disturbance wherever possible, with removal methodology to be determined in consultation with the supervising Arborist. Seeds from removed vegetation will be collected by the Arborist for future use as part of compensatory planting.
	• In the event that vegetation removal impacts upon potential fauna habitat (i.e. hollow, nest, drey) a suitably qualified ecologist will be engaged to relocate fauna prior to vegetation clearing wherever possible and to supervise vegetation removal works to relocate any fauna that may be encountered during vegetation removal.
	• Rehabilitation procedures will be implemented as outlined under **Section 7.12.2.2**.

Noise & Vibration	• All equipment used will comply with *AS2436-1981 Guide to Noise Control on Construction, Maintenance and Demolition Sites*. • Work and deliveries will only occur during the following times: Monday to Friday 7am to 6pm, Saturday 8am to 1pm. No construction work or deliveries will occur on Sundays or public holidays. • Regular and effective maintenance of all equipment, including vehicles moving on and off the site, will be conducted. • Plant and equipment which is used intermittently will either be shut down in the intervening periods between works or throttled down to a minimum. • Any portable equipment with the potential to create high levels of noise (e.g. compressors, generators) will only be selected for use if it incorporates effective noise control. This equipment should be located, where practical, so that natural ground barriers are between it and the nearest potentially affected receivers. • Vibration generating plant to be located, where practical, as far from neighbouring industrial buildings as possible; and • Mountings for all high vibration generating equipment will be installed such that there are no rigid connections between the equipment and the supporting structure.
Air Quality	• All vehicles and machinery will be fitted with approved exhaust systems to maintain exhaust emissions within accepted standards. • All machinery will be correctly maintained and operated as per operation manual. Excessively loud or poorly maintained machinery / vehicles may be removed from site, at the discretion of the Project Manager, Decommissioning Manager, Environmental Manager or appointed delegate. • Natural lighting will be utilised wherever possible. • Power generated from photovoltaic cells and battery storage may be used onsite. • Variable frequency drive motor controls will be utilised on stationary equipment wherever possible to minimise electricity consumption. • Machinery and vehicles will not be left running or idling when not in use for long periods. • Odour or air pollutant emission complaints will be dealt with promptly and the source will be eliminated wherever practicable. • Truck routes and loading capacity will be designed and optimised to reduce the distance and effort required by the vehicles. • Waste transfer vehicles to leave site with full loads to reduce the number of traffic movements and diesel consumption • All incoming and outgoing loads will be suitably covered to ensure that dust or particulate matter is not generated from the load;

MITIGATION MEASURES	
	• All loads of excavated material, soil, fill and other erodible matter that are transported to or from the work site will be kept covered at all times during transportation and will remain covered until they are unloaded either for use at the work site, reuse or disposal at an EPA licensed waste disposal facility. • All work sites, general work areas and stockpiles will be closely monitored for dust generation and watered down (with clean water) or covered (tarpaulins) in the event of dry and/or windy conditions. • In the event visible dust emissions are observed beyond the site boundary, related works will be ceased and additional controls put in place to control dust emissions. If visible dust emissions continue to drift beyond the site boundary, related works are to cease until more favourable environmental conditions are present. • Landscaping sprinkler systems may be used as dust suppression systems (noting increased potential for sediment laden runoff to occur). • Onsite speed limit will be limited to a maximum of 15km/hr to ensure minimal dust generation from vehicle movements; • Driveways and haulage paths are to be regularly swept to prevent the accumulation of fine materials. • In adverse weather conditions bulk landscaping supplies must be wet down so as to minimise the release of dust at the time of unloading or loading. • Dust on site will be visually monitored by the Decommissioning 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.
Surface Water	• Sediment and nutrient controls, installed in accordance with the *Landcom Managing Urban Stormwater – Soils and Construction* (the Blue Book), will be implemented to reduce the impacts of stormwater, erosion and sedimentation on water quality. Specific erosion and sediment controls are to be contained within the site ESCP. All erosion and sediment control measures will be established before any ground disturbance works commence. Control measures are to remain in place until all surfaces have been fully restored and stabilised. • Sandbags will be placed at the entry points to any culverts and stormwater channels to prevent sediment entering the stormwater system. • Sediment and erosion control devices will be inspected regularly, maintained to ensure effectiveness over the entire duration of the project, and cleaned out before 30% capacity is reached. • Any temporary stockpiles will have appropriate erosion control devices installed to control runoff and prevent sedimentation. • Sediment fences will be installed down slope of all disturbed areas and material stockpile areas. • Erosion potential would be limited by managing runoff fetches and velocities, with measures such as contour drains or silt fences. • Sediment filters such as silt fences or coir bales will be located downstream of disturbed areas. • No chemicals, fuels, and/or waste will be stored or collected for disposal within or adjacent to drainage lines or unsealed surfaces. Nevertheless a 'spill kit' will be kept on site at all times for potential chemical or fuel spills. • Drainage systems will be checked at regular intervals and maintained to ensure they are operating at full capacity (e.g. clearance of debris from drainage lines). • Pipes, pits and bunds to be regularly checked for the build-up of excessive sediment. • Site structures to be regularly checked for erosion and scouring. • Treatment areas and structures to be regularly checked for the build-up of litter material. • Inflow areas and pit grates are to be clear of litter and debris. • The sediment chamber of the SPEL ecoceptor is to be regularly checked and cleaned and any damaged covers replaced. • Where they remain onsite, ensure downpipe leaf eaters, first flush devices and litter screens are unblocked and are operating correctly. • Rainwater tanks to be regularly checked for any accumulation of litter, sediment or debris on or within the tanks. • Spill kits will be maintained onsite for the duration of decommissioning and rehabilitation works onsite. • Staff will be appropriately trained on spill containment and management.
Groundwater	• Should groundwater be encountered during any ground disturbance works, standard construction and water management / disposal methods are to be employed. • In the event of a leakage or spillage of leachate, or other potentially contaminating liquid, assessment of the impacts should be undertaken to determine the need for any clean up works.

MITIGATION MEASURES	
	This may include soil and / or groundwater testing. In this event groundwater results should be assessed with respect to both the background data and relevant guideline thresholds. • Spill kits will be maintained onsite throughout the duration of decommissioning and rehabilitation works onsite. • Staff and contractors will be appropriately trained on spill containment and management.
Traffic	• Vehicle speed limits onsite shall be limited to 15 km/h onsite. • Posted speed limits will be adhered to on public roads. • Work areas shall be bounded by fencing or barriers to prevent pedestrian access. Safe, alternative access should be provided for pedestrians where required. • Where possible heavy vehicle movements will be scheduled to avoid the morning and afternoon peak traffic periods. • 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. • 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. • 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. • The Traffic Management Plan will be updated prior to the commencement of decommissioning works, to be implemented throughout the duration of decommissioning and rehabilitation onsite.

MITIGATION MEASURES	
Waste	• Wherever possible waste generated during site decommissioning and rehabilitation will be reused. Waste that cannot be avoided, re-used or recycled will be managed in accordance with the principles of the *Waste Avoidance and Resource Recovery Act 2001* and classified in accordance with the Waste Classification Guidelines and disposed of at appropriately licenced facilities. • All vessels used for contaminated or hazardous waste should be sealed, labelled according to their contents, and stored within bunded areas until their removal from the work site. • Any fuel, lubricant or hydraulic fluid spillages will be collected using absorbent material and the contaminated material disposed of at an EPA licensed waste depot. • In the unlikely event of a pollution incident, the relevant authorities will be notified in accordance with Clause 148 of the POEO Act and remedial actions undertaken. Environmental incident response and notification procedures are detailed in Section 6.2 of the Facility OEMP. • The work site will be left clean and free of debris and other rubbish at the end of works • If existing services are to be removed then portable, self-contained toilets would be provided at the work site and would be regularly emptied and serviced by the contractor providing them. • Hazardous wastes, if any, on site will be removed and disposed in accordance with the state and national regulations and guidelines and best practice for the removal of these materials. • Treatment, handling and disposal methods for contaminated soils, when encountered, will be done in accordance with NSW EPA Guidelines. Contaminated soils will be disposed of at an EPA licensed waste depot. • Plant and equipment will be regularly maintained. • Ordering will be limited to only the required amount of materials. • Materials will be segregated to maximise reuse and recycling. • Routine checks would be undertaken of waste sorting and storage areas for cleanliness, hygiene and OH&S issues, and contaminated waste materials. • Local commercial reuse opportunities will be investigated where reuse on-site is not practical. • Separate skips and recycling bins will be provided for effective waste segregation and recycling purposes. • Training and awareness of the requirements of the WMP and specific waste management strategies will be undertaken. • Contaminated waste will be managed, transported, and disposed of in accordance with licensing requirements. • Waste removed from site will be transported and disposed of in accordance with licensing requirements. • Assessment of suspicious potentially contaminated materials, hazardous materials and liquid wastes will be undertaken in accordance with relevant guidelines and legislation at the time. • Regular monitoring, inspection and reporting requirements will be undertaken with findings implemented. • All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.
Contamination	• The Facility Unexpected Finds Protocol will be updated to suit decommissioning and rehabilitation of the Facility. • The updated Unexpected Finds Protocol will be implemented for the duration of decommissioning and rehabilitation works onsite. • Any water seepage encountered during decommissioning and rehabilitation activities will be appropriately managed; • Treatment, handling and disposal methods for contamination, when encountered, will be done in accordance with EPA Guidelines. • All potentially contaminated soil excavated must be stockpiled in a secure area and be assessed and classified in accordance with the Waste Classification Guidelines (EPA, 2014) before being transported from the site for disposal at an appropriately licensed waste facility. • Should unexpected contamination be encountered, a suitably qualified environmental consultant will be engaged to assess the conditions in accordance with the site Unexpected Finds Protocol and implement remediation activities in accordance with relevant legislation and guidelines. • Any excavated materials that are considered to be potentially contaminated will be delineated for testing, disposal, treatment, or re-use.
Hydrocarbons	• The Facility Emergency Response Plan will be updated as required to address decommissioning and rehabilitation onsite.

MITIGATION MEASURES	
	• The updated Facility Emergency Response Plan will be implemented for the duration of works onsite. • All mobile plant and equipment will be fitted with fire extinguishers. • All staff on site will be appropriately trained in the handling of dangerous goods. • Flammable and combustible liquids with be stored in accordance with AS1940. • All staff on site will be appropriately trained in the handling of dangerous goods.
Fire	• Smoking is to only occur onsite within clearly signposted smoking areas. • Fire extinguishers will be maintained in readily accessible locations. • All equipment will be regularly serviced in line with the manufacturer's recommendations. • In the event that a fire cannot be extinguished using water or soil, the use of fire retardants will be considered (expert advice should be sought from Fire and Rescue NSW before taking action with retardants). • Once the fire has been extinguished, affected areas will be monitored on a continual basis until materials have cooled. • All water used in fire suppression will be contained within established stormwater and sediment and erosion control systems. • All staff will be trained in the use of firefighting equipment for application in the event of an emergency. • Combustible materials will not be stored / accumulated in areas close to exhausts or engines. • Flammable and combustible liquids will be stored in accordance with *AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids*. • All mobile plant and equipment will be fitted with fire extinguishers. • All mobile plant and equipment will be regularly serviced to ensure they are in a safe and functioning condition • The site stormwater management system has been designed such that it can be isolated from the street stormwater system in the event of a fire to control the release of contaminated fire water.

Flood	• A *Floodsafe Emergency Kit* will be prepared for decommissioning works onsite. The Floodsafe Emergency Kit should include the following items:
	  ○ Copy of Emergency Response Plan for the Facility.
	  ○ Chemical Register.
	  ○ Air horn and hand-held loudspeaker.
	  ○ Portable radios with spare batteries.
	  ○ A torch with spare batteries.
	  ○ A first aid kit.
	  ○ Candles and waterproof matches.
	  ○ Waterproof bag for valuables.
	  ○ Drinking water and non-perishable food items.
	  ○ A copy of emergency contact phone numbers.
	  ○ **When evacuating include -** sign in book to track visitors and contractors who may be onsite, drinking water, medicine, non-perishable food items and any special requirements known to be required for personnel onsite.
	• The Flood Emergency Kit should be kept in a suitable location (control room during operation) on a roll trolley suitable for easy deployment in the event of an evacuation. The contents of the kit and management during a flood event will be the responsibility of the First Aid Officers.
	• Flood management and response will occur as outline under the Facility Flood Emergency Response Plan, which is included as an Attachment to the OEMP.
	• Routine evacuation drills will be implemented as part of ongoing training onsite.
	• All contractors and machine operators will be inducted on the environmental sensitivities of the work site(s) and relevant safeguards.
	• reDirect Recycling will register to the Water NSW Early Warning Network, which provides early warnings for adverse weather or dam break / release that may result in a flooding emergency.
	• The flood Emergency Assembly Point will be located within the drill muds warehouse if retained during decommissioning, otherwise a secondary location will be located above 39 m Australian Height Datum (AHD).

MITIGATION MEASURES	
	• In the event were the Bureau of Meteorology issues a Severe Thunderstorm Warning or Generalised Flood Warning with depths in the order of the 1% AEP predicted rainfall depths presented in Table 3 it is recommended the facility be closed and evacuated prior to the commencement of rainfall. • If there are any staff or visitors still on-site at the commencement of rainfall (accompanying a flood warning), it is recommended they seek refuge in the designated Emergency Assembly Point and wait until flood waters subside. • Evacuation from the subject site is not recommended during a flood event. Refuge onsite is the safest option following commencement of a flood event. In the event where evacuation is required, the preferred evacuation route from the subject site is to the east along Davis Street turning south along Elizabeth Street, west along The Horsley Drive, south along Mimosa Road and finally east or west along Polding Street. • If staff and visitors remain on site during a flood event, refuge be sort on site until flood water subsides. Evacuation should only be attempted in an emergency for events up to the 1% Annal Exceedance Probability (AEP) design storm event. Evacuation should not be attempted during the PMF (Probable Maximum Flood) unless advised otherwise by emergency personnel. • For emergency assistance during flood events, please call the SES on 132 500.
Odour	• 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; and • All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.
Visual Amenity	• Visual impacts are expected to be minor and short-term however additional management measures, such as the installation of a visual screen along the boundary fronting Davis Rd, may be implemented in the event of a complaint. • Rehabilitation planting (where required) will commence as soon as practicable to provide additional visual screening of the Facility.
Cultural Heritage	• Should any Aboriginal artefact be uncovered during construction or operation all works will cease in that locale and Heritage NSW will be notified. Works will only recommence when an appropriate and approved management strategy has been agreed to by all of the relevant stakeholders. • All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.
Historical Heritage	• 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. • All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.
Greenhouse Gas	• Variable frequency drive motor controls will be used on stationary equipment to minimise electricity consumption. • Waste transfer vehicles to leave site with full loads to reduce the number of traffic movements and diesel consumption. • All vehicles/plant and machinery will be turned off when not in use and regularly serviced to ensure efficient operation. • Truck routes and loading capacity will be designed and optimised to reduce the distance and effort required by the vehicles.
Socio-economic	• Consultation will be undertaken as outlined in this DMP.
Emergency Preparedness	• Emergency procedures and information will be displayed in the site office or other visible location. • Theoretical emergency scenarios will be included as part of routine training onsite. • Regular identification and checking of all site fire extinguishers and firefighting equipment will be undertaken onsite.

MITIGATION MEASURES	

Emergency Procedure	• In the event of an emergency the following procedures would be followed to first protect life and then minimise the impact of the incident on the environment:
	  ○ Raise the alarm by calling 000 and advise ambulance or fire brigade and give clear instructions regarding location and nature of the incident
	  ○ Call emergency co-ordinator (Decommissioning Manager) and advise that 000 have been contacted, then advise nature of the emergency
	  ○ Stop all work immediately, make safe work area and report status to relevant contract administrator
	  ○ Assemble in nominated assembly points until further instruction is received from Decommissioning Manager, Project Manager or emergency services personnel.
	  ○ Assist anyone ion the workplace who may not be familiar with evacuation procedures
	  ○ Assist with first aid or first response if trained to do so
	  ○ Assess the situation, and if it is safe to do so, take action to reduce the spread of the incident

12 Monitoring & Reporting

The following subsections outline environmental and compliance monitoring that will be undertaken during the decommissioning of the Facility. These monitoring actions will supersede those stipulated under the facility OEMP when the Facility transitions from operation to decommissioning.

12.1 Compliance Monitoring

12.1.1 Environmental Inspections

12.1.1.1 Daily site inspections

Daily inspections will be undertaken by the Decommissioning Manager, Environmental Manager, or appropriate delegate to ensure site compliance. Results of the inspections will be appropriately recorded and documented and discussed at toolbox talks.

12.1.1.2 Event based inspections

Event based inspections will be undertaken by the Environmental Manager following any significant event including rainfall of a sufficient quantity, strong winds, or receipt of an environmental complaint. Results of the inspections will be appropriately recorded and documented and discussed at toolbox talks.

12.1.2 Training and Actions

The Decommissioning Manager, personnel and associated contractors shall be trained into what constitutes a non-conformance and how non-conformance are to be managed.

Non-conformances are to be reported to the Decommissioning Manager who is responsible for the following:

- Notify the Project Manager of the non-conformance in accordance with the timeframe stipulated on the form.
- Implement the corrective actions determined as part of the process.
- Report to the Project Manager on progress and when the corrective actions have been closed out.

Where corrective actions are beyond the control of the Decommissioning Manager, these corrective actions are to be drawn to the attention of the Project Manager and / or Environmental Manager for support.

The Project Manager must:

- Enter the non-conformance on the non-conformance register for tracking.
- Provide support to the Decommissioning Manager when corrective actions are beyond the control of the Decommissioning Manager.
- Monitor progress and close out corrective actions on the register.
- Undertake targeted inspections to verify close out corrective actions.

12.1.3 Compliance Reporting

In accordance with Condition C10, **within 24 hours of 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 14 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 10.2** of this DMP.

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.

All incidents will be communicated to the reDirect Recycling Project Manager for recording. The Project Manager may also direct the Decommissioning Manager and / Environmental Manager to enact further controls in response to the incident. A register of accidents, incidents and potential incidents will be maintained by the Project Manager. The register shall be made available for inspection at any time by the independent Hazard Auditor and DPE.

12.2 Stormwater System & ESC

Table 12 below outlines Stormwater device monitoring and maintenance to be undertaken at the Facility in the event that the installed stormwater system will be retained following decommissioning of the Facility. Stormwater monitoring and

maintenance will be undertaken weekly during the decommissioning of the Facility, appreciating that these systems would be essential for the implementation of erosion and sediment controls applied during decommissioning and rehabilitation. Additional monitoring and maintenance events may be undertaken at the discretion of the Project Manager, Decommissioning Manager and / or Environmental Manager if deemed appropriate (e.g. following adverse weather).

Temporary erosion and sediment controls, installed under the Facility decommissioning ESCP, will be inspected alongside stormwater controls listed under **Table 12**. Erosion and sediment controls will be cleaned out and / or replaced as required following site inspections.

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

Table 12 Stormwater monitoring and maintenance to be undertaken at the Facility

ITEM TO BE MONITORED	MONITORING TASK	PURPOSE OF MONITORING	MAINTENANCE ACTION
GENERAL			
Environmental Incident or Unexpected Find	Environmental incident in driveway, ramp or car park etc. Visual indications of gross contamination at ground surface, drain or stormwater control device (e.g. a visible sheen, hydrocarbon odour or staining, gross waste).	Check whether additional environmental controls or monitoring are required. Assess notification requirements (e.g. to FCC, EPA).	Implement additional environmental controls (e.g. spill clean-up, erosion controls). Review and conduct additional sampling of stormwater discharge, as required.
Sediment Build Up	Check for excessive build- up of sediment in stormwater system including pits and pipes. If sediment build up is noted, identify source.	If sediment accumulates in stormwater pits and pipes, capacity reduction can occur. Excessive build-up of sediments in Ecoceptor can reduce the effectiveness of the devices over time. Erosion and sedimentation of stored waste material may contribute to increased transport of pollutants.	Once sediment source has been identified and stabilised, remove accumulated sediment by flushing the system and/or emptying the Ecoceptor
Erosion or Scour	Check for erosion and scour around the structures. If scour is noted check for source of scour.	Erosion impairs filtration systems by preventing uniform distribution of flow through the system.	Fill in any holes with appropriate filter media. 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

ITEM TO BE MONITORED	MONITORING TASK	PURPOSE OF MONITORING	MAINTENANCE ACTION
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			
SPEL Ecoceptor	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.		
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.		If any accumulation is found within the tank, then drain and flush the tank with potable water.

ITEM TO BE MONITORED	MONITORING TASK	PURPOSE OF MONITORING	MAINTENANCE ACTION
Sand Filter	Monitor ponding and its duration compared to design infiltration period. Remove deposited sediment and debris from the sand level and inlet/outlet areas. Regularly check the structural integrity of hydraulic structures.	Failure of the sand filter to perform as designed may result in local overflows and/or sediment and nutrient deposits downstream.	Inspect sand level for erosion and scour. Replace sand and inspect drainage as appropriate.
Exceedance of water quality objectives	Condition L1 of the EPL states that the licensee must comply with section 120 of the POEO Act, which prohibits the pollution of waters. Stormwater quality should also meet FCC stormwater quality, discharge requirements or approval conditions. In the absence of any EPL or FCC criteria, site-specific risk-based screening criteria should be adopted from NSW EPA made or approved guidance appropriate for the commercial/industrial land use and heavily disturbed receiving environment. These include: ANZG (2018) *Australian and New Zealand Guidelines for Fresh and Marine Water Quality* for heavily disturbed environments; and, primary contact recreation (PCR) guidelines adopted from National Health and Medical Research Council (NHMRC) (2011), *Australian Drinking Water Guidelines* and NHMRC (2008) *Guidelines for Managing Risks in Recreational Water*.	Verify soil and erosion, and stormwater, management controls in SSD-7401 are performing as designed.	Review the above triggers and actions.

12.3 Groundwater Monitoring

Senversa Pty Ltd (Senversa) prepared a Water Management Plan to outline water monitoring requirements during the operation of the Facility. With respects to groundwater, monitoring was to be undertaken in the following manner:

- Baseline monitoring – undertaken every six (6) months in first two (2) years of operation.
- Periodic – annual monitoring (including data report) with data reviewed for summary report every three (3) years.
- Additional monitoring when triggered as outlined under Section 5.5 of the Water Management Plan.

During decommissioning, groundwater monitoring will be limited to 'triggered' events, including:

- **Damaged or lost wells** - Assess whether ongoing monitoring at the location is necessary. If required, repair or re-install the well.
- **Incident** (e.g. spill or release of a material or liquid) that could result in impact to surface or groundwater.
- **Change in nature or management of imported materials that has the potential to result in a significantly increased risk of impact from leachate.**

The scope of sampling and level of analysis required will be determined in consultation with a suitably qualified contamination / groundwater consultant. The results of sampling events undertaken during operation will be provided to the third-party

consultant to aid in the determination of sampling and analysis scope. Sampling will utilize groundwater wells installed by Senversa in March-April 2022 unless these are replaced, or additional groundwater well are installed during operation. The Senervsa groundwater wells have been installed in the following locations (see **Figure 1**):

- One well (MW06) that captures the quality of background groundwater migrating onto the site from the north.
- Five wells (MW01, MW02, MW03, MW04, MW05) placed in targeted locations with the following rationale:
    - MW01 – Down gradient of the stormwater treatment sand filter box.
    - MW02 – Down gradient of the Ecoceptor.
    - MW03 – Western site boundary down gradient of neighbouring property.
    - MW04 – Down gradient of the drill mud processing facility on eastern boundary.
    - MW05 – Middle level of site in the vicinity of the historic aboveground storage tanks (ASTs).

Sampling shall be undertaken by a suitably qualified and experienced person consistent with guidance in the following documents (unless superceded at the time of decommissioning):

- DEC (2004). *Approved Methods for Sampling and Analysis of Water Pollutants in NSW*. March 2004.
- AS/NZS 5667.1:1998, *Water Quality – Sampling* series.
- NEPC (2013). *Schedule B (2) Guideline on Site Characterisation*.

Appropriate data Quality Analysis (QA) / Quality Control (QC) procedures consistent with the above guidance shall be implemented and assessed as part of the program. All analyses shall be conducted by a National Association of Testing Authorities (NATA) accredited laboratory.

Figure 1: Groundwater Well Locations (Senversa, 2022)

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12.4 Auditing and reporting

Internal audits will be carried out by the Environmental Manager every three (3) months during decommissioning and rehabilitation, with the first audit occurring no longer than one (1) month after commencement of decommissioning works onsite.

These audits will be undertaken to verify compliance with:

- The final DMP.
- DMP subplans (ESCP, WMP, TMP, UFP, ERP, etc).
- Project EIS, and modification documents.
- SSD7401 Consolidated COA.
- Facility EPL.
- Any additional relevant legal and other requirements (e.g. licences, permits, regulations).

Outcomes of the audit are to be documented and reported to the Decommissioning Manager, Environmental Manager and Project Manager, with responses to any opportunities for improvement and / or non-compliances identified further documented and retained for the duration of decommissioning works.

The above reporting will be undertaken in conjunction with those required under the project EPL (e.g. Annual Return, Statement of Compliance, Complaints Summary). **The most recent version of the EPL will be attached to the final DMP, with monitoring and reporting commitments updated in the final DMP accordingly.**

12.5 Non-conformity, corrective and preventative actions

A non-conformance is the failure or refusal to comply with the requirements of the OEMP, this DMP and and supporting documentation.

For each non-conformance identified corrective/preventative action (or actions) must be implemented. In addition, any environmental management improvement opportunities can be initiated as a result of incidents or emergencies, monitoring and measurement, audit findings or other reviews. Improvement opportunities may also result in the implementation of corrective/preventative actions.

Any action undertaken to rectify a non-conformance or to improve environmental and / or compliance management onsite is to be documented by the Decommissioning Manager or Environmental Manager and passed onto the Project Manager for storage.

13 Document Review

The scope of works enacted under the final DMP will be subject to various external influences, including (but not limited to):

- reDirect Recycling.
- Davis Road Property Development.
- Bettergrow.
- Any third party who may purchase the property.
- Fairfield City Council.
- DPE (and other Government Authorities).
- NSW EPA.
- Surrounding landholders.

This DMP will likely undergo several variations prior to implementation. Responses to potential triggers for DMP update are discussed in the following subsections.

13.1 Required Updates

In accordance with Condition C8, this DMP 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.
- 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 DMP and / or supporting documents, communication with DPE will be required. Communication will occur in two ways:

1. 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.
2. Minor amendments such as administrative changes may not require endorsement from the Secretary. DPE will be notified of minor changes, seeking feedback as to whether approval of the updated document is required by the Secretary.

13.2 Management Review

In addition to the above, routine monitoring and / or Management Review of the Facility may identify the need for updating the DMP. The Management Review is facilitated by the Project Manager, ensuring the recommendations of the Management Review are implemented. Under Condition C9, compliance of the Facility is to be assessed and reported on a yearly basis (see Section 8.2 of OEMP), however additional Management Reviews may be undertaken at any time at the discretion of the Project Manager to assess compliance of operations and to determine whether the DMP (as a sub-plan to the OEMP) is suitable, adequate and effective for the Facility.

Any update of the DMP and / or supporting documents is to be managed in consultation with DPE as outlined under the Facility OEMP.

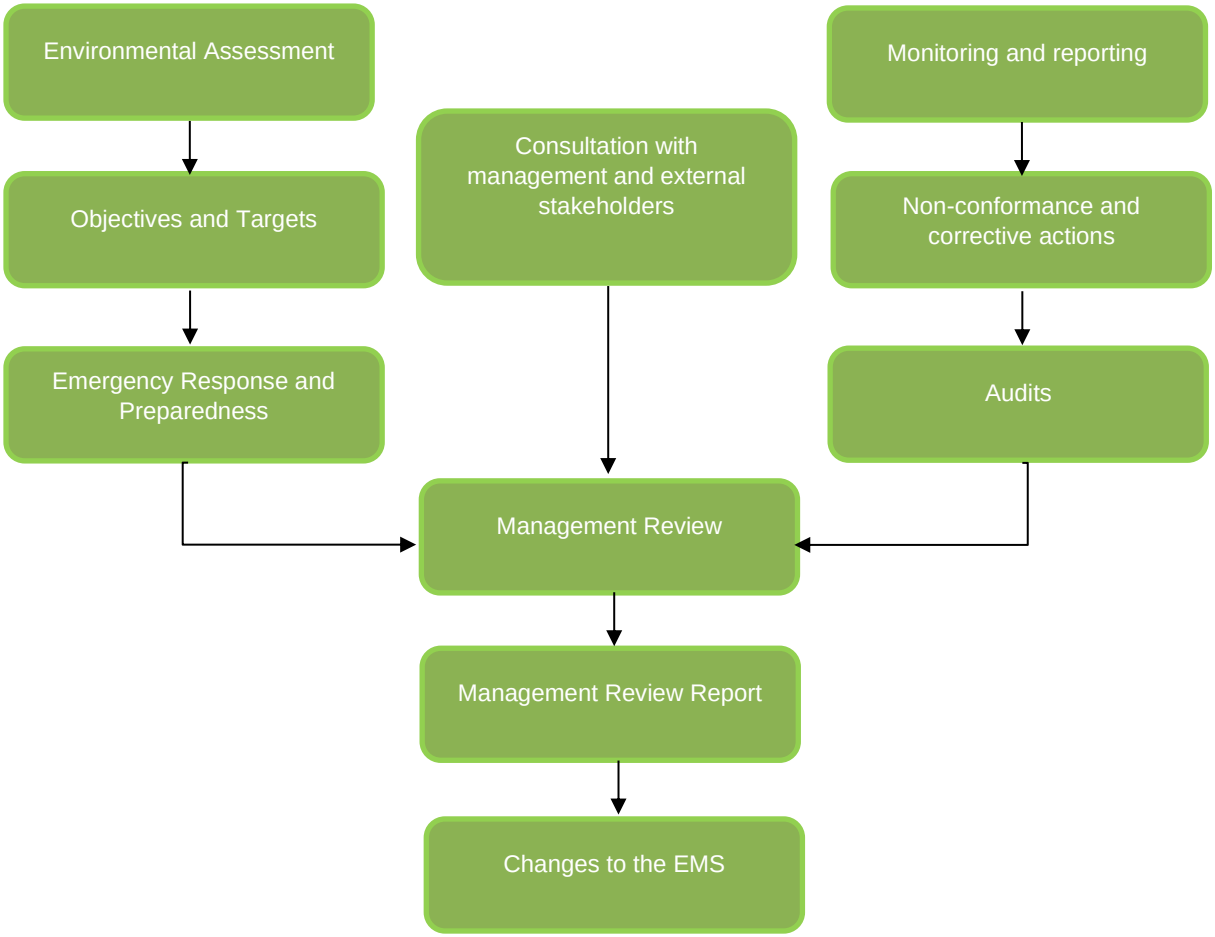
13.3 Staged Development

This DMP relates to Stage 1 operations at the Facility. As such, in accordance with Condition A15 and A16 of SSD-7401 COA, this DMP addresses items relevant to Stage 1 operations only. This DMP will be updated to address the decommissioning of the Facility as a whole prior to the commencement of operation of Stage 2 of the Facility (unless further staging occurs).

13.4 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 and consultation may advise improvements or modifications to site management and practices. **Figure 2** below outlines the method of continuous improvement to be applied following monitoring and site auditing events.

Figure 2 Environmental Monitoring, Audit and Review Procedure.



14 Conclusion

This DMP has been prepared by Space Urban on behalf of ReDirect Recycling, to address the decommissioning of Stage 1 of the Resource Recovery and Recycling Facility, located at 24 Davis Road Wetherill Park, NSW.

This DMP has been prepared in accordance with the SSD-7401 Consolidated COA to mitigate potential impacts resulting from the cessation of operation of the Facility at the end of the Project's useful economic life. In accordance with Schedule 2, Condition B80 of SSD-7401, this DMP will be reviewed to the satisfaction of the Planning Secretary 12 months prior to the closure of the Facility. The review will provide clarification on the scope of works required during decommissioning and will include the preparation of a **Decommissioning Waste Management Plan** and update to the existing operational **Traffic Management Plan** to address waste management and transport during decommissioning and rehabilitation works onsite.

Attachment 1: SSD-7401 Consolidated Consent

Attachment 2: Complaints Register

COMPLAINTS REGISTRATION FORM

Date of Contact:
Time:
Received By:
Type of Contact (Phone, Email, Verbal, Other)
Complainant Details
Name:
Address:
Phone:
Follow Up Required:
Preferred Method of Contact:
Complaint Details
Corrective Action (If None, Why No Action Was Taken)
Assigned To
Name:
Position:
Action Completed
Date:
Time:
Close Off:
Name:
Position:
Signature:

Attachment 3: Example Waste Tracking Form

WASTE TRACKING REGISTER

Date/Time	Waste Classification (Special waste, general solid waste, liquid waste etc)	Waste Description (concrete, steel, spoil etc)	Amount	Transporter	Receiving Facility	Waste Use (recycled, stored, treated, disposed)	Reference (Receipt, certificate)1

Attachment 4: Environmental Training Register

ENVIRONMENTAL TRAINING REGISTER

Name	Title	Project Role	Date/Time	Trainer Name	Training Provided	Qualifications/Licences/Tickets

Attachment 5: Bettergrow Environmental Policy