



Operational Environmental Management Plan

reDirect Recycling Pty Ltd
Resource Recovery and Recycling Facility

24 Davis Road Wetherill Park, NSW

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Prepared by: Space Urban Pty Ltd

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Attachments

- Attachment 1: SSD-7401 Consolidated Approval & Approved Plans
- Attachment 2: Air Quality and Odour Management Plan
- Attachment 3: Stormwater Assessment
- Attachment 4: Waste Management Plan
- Attachment 5: Trade Waste Agreement
- Attachment 6: Flood Emergency Response Plan
- Attachment 7: Surface & Groundwater Management Plan
- Attachment 8: Emergency Response Plan
- Attachment 9: Operational Traffic Management Plan
- Attachment 10: Conditions Compliance Report
- Attachment 11: Approved Landscape Plans
- Attachment 12: Conceptual Decommissioning Management Plan
- Attachment 13: EPL 21092
- Attachment 14: Example Environmental Inspection Form

1 Introduction

1.1 Background

1.1.1 Project Approval

This Operational Environmental Management Plan (OEMP) 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).

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 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) 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) and Stamped Approved Plans for SSD-7401 (including modifications).

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

- 60,000 tonnes per annum (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.

1.1.2 Project Description

The main waste types and materials to be accepted at the site will 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. Once all stages of construction are completed, 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 OEMP covers facility operations conducted under **Stage 1** of SSD -7401 (including modifications). **Stage 1** includes the drill mud processing area only. Operation of **Stage 2** will require a revision / addendum to this OEMP and includes 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 OEMP (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 and emergency access for Fire NSW.
- Internal hardstand areas and roadways.

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

1.2 OEMP Scope

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

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

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

In addition, implementing this OEMP will ensure that operation of the Facility will be undertaken in accordance with relevant statutory and regulatory requirements. This OEMP has also been prepared to ensure compliance with the requirements of SSD-7401 Environmental Impact Statement (EIS), SSD-7401-MOD-1 Statement of Environmental Effects (SEE), SSD-7401-MOD-2 application documents (letter application, Response to Submissions, response to Request for Further Information), SSD-7401-MOD-3 application documents (Environmental Assessment, Response to Submissions), SSD-7401 Environmental Protection Licence (EPL) Number 21092 (EPL 21092) (currently in the process of updating), and other relevant project approvals.

1.3 Policy drivers supporting the project

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

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

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

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

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

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

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

The circular economy is based on the following key principles:

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

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

1.4 OEMP objectives

The objectives of the OEMP are to:

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

1.5 Facility Objectives

The key objectives of the Facility are to:

- Providing combined capacity of up to 350,000 tpa of resource recovery for food and garden organics, commercial and industrial (C&I) food wastes, hydro excavation and drill muds and other related recycled products.
- Recycle materials that would traditionally be disposed of to landfill.

- Increase the amount of household waste that is recycled.

1.6 Targets

Construction and operation of the Facility will increase and expand recycling infrastructure in Western Sydney and will make an important contribution to recycling rates in support of the WSMS. Thus, the facility has adopted the recycling aim to achieve a recycling rate of 97.5% of all waste and a disposal rate of not more than 2.5% to landfill.

In addition, reDirect Recycling have commitment to the aim of achieving the following stormwater reduction targets within 6 months of the commencement of operation of the landscaping materials supplies facility (to be supplied to the Planning Secretary of DPE):

- Gross pollutants – 90%.
- Total suspended solids (TSS) - 80%.
- Total phosphorous (TP) – 55%.
- Total nitrogen – 40%.

2 Development description

2.1 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 m² 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 a parcel of retained vegetation exists at the front of the property creating a natural visual barrier.

2.2 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: <ul style="list-style-type: none"> (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.

ELEMENT	SSD-7401-MOD-3 SUMMARY
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	<ul style="list-style-type: none"> • 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 • 73m² of gravel road drains directly to the SPEL Ecoceptor 6000 prior to draining into receiving environments. • 317m² of hardstand fronting Davis Rd and 1676m² of landscaping will drain into existing roadside drainage structures prior to flowing into the receiving environment.
Received wastes	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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.

ELEMENT	SSD-7401-MOD-3 SUMMARY
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.

2.3 Approvals Operating on the Site

Compliance with COA for the operation of Stage 1 of SSD-7401-MOD-2 are provided in **Table 3**. For consistency, administration items that may be triggered during operation of the Facility have been included in **Table 3**.

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

- SSD-7401 Consolidated COA (includes SSD-7401, SSD-7401-MOD-1, SSD-7401-MOD-2 and SSD-7401-MOD-3).
- The facility Environment Protection Licence (current: EPL 21092).
- SSD-7401 EIS, including appendices and the EIS Statement of Commitments.
- SSD-7401-MOD-1 SEE, including appendices.
- SSD-7401-MOD-2 application letter, titled Proposed modification to SSD-7401 – 24 Davis Road, Wetherill Park, NSW and dated 25 August 2021 (including appendices).
- SSD-7401-MOD-2 Response to Submissions (RTS), dated 29 October 2021 (including appendices).
- SSD-7401-MOD-2 Space Urban response to DPIE request for further information letter, titled *Response to Department of Planning, Industry and Environment Request for Information, dated 19 November 2021 – SSD-7401-MOD-2* and dated 22 November 2021 (including attachments).
- SSD-7401-MOD-3 Environment Assessment, dated 20 December 2021 (including appendices).
- SSD-7401-MOD-3 RTS, dated 21 February 2022 (including appendices).
- Any statutory guidelines referenced within the above documents.

In addition, this OEMP has been prepared in accordance with Condition C4 of SSD-7401 Consolidated COA and addresses all documents stated above and, at minimum, will:

- *Be approved by the Planning Secretary prior to the commencement of operations.*
- *Be prepared by a suitably qualified and experienced expert.*
- *Provide the strategic framework for environmental management of the Development.*
- *Identify the statutory approvals that apply to the Development.*
- *Provide a legible site plan which shows all the various operations on the site.*
- *Detail the FGO and FLD cleaning and maintenance regime (Note: not required under Stage 1 of operation).*
- *Include the details of the groundwater monitoring as required by Condition B36.*
- *Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development.*
- *Describe the procedures that would be implemented to:*
 - *keep the local community and relevant agencies informed about the operation and environmental performance of the Development;*
 - *receive, handle, respond to, and record complaints;*
 - *resolve any disputes that may arise;*
 - *respond to any non-compliance; and*
 - *respond to emergencies.*
- *Include the following environmental management plans:*
 - *Waste Management Plan (Condition B12);*
 - *Air Quality and Odour Management Plan (see Condition B24);*
 - *Water Management Plan (see Condition B49);*
 - *Emergency Response Plan that addresses flooding, chemical spills and fire water containment (see Condition B51 and B40);*
 - *Operational Traffic Management Plan (see Condition B55); and*
 - *Conceptual Decommissioning Management Plan (see Condition B80).*

This OEMP currently addresses **Stage 1** of the Facility only. **Stage 1** of operation does not include the bulk landscape area and the organics processing area. As such, management requirements for the operation of the bulk landscape area and the organics processing area are not included in this OEMP or any sub-plans of this OEMP required under the SSD-7401 Consolidated COA. This OEMP and sub-plans will be updated accordingly when future elements of the Facility are set to become operational. It is noted that updated plans will require approval from the Planning Secretary prior to use.

Figure 1 illustrates the extent of the Facility that will operate under **Stage 1**.

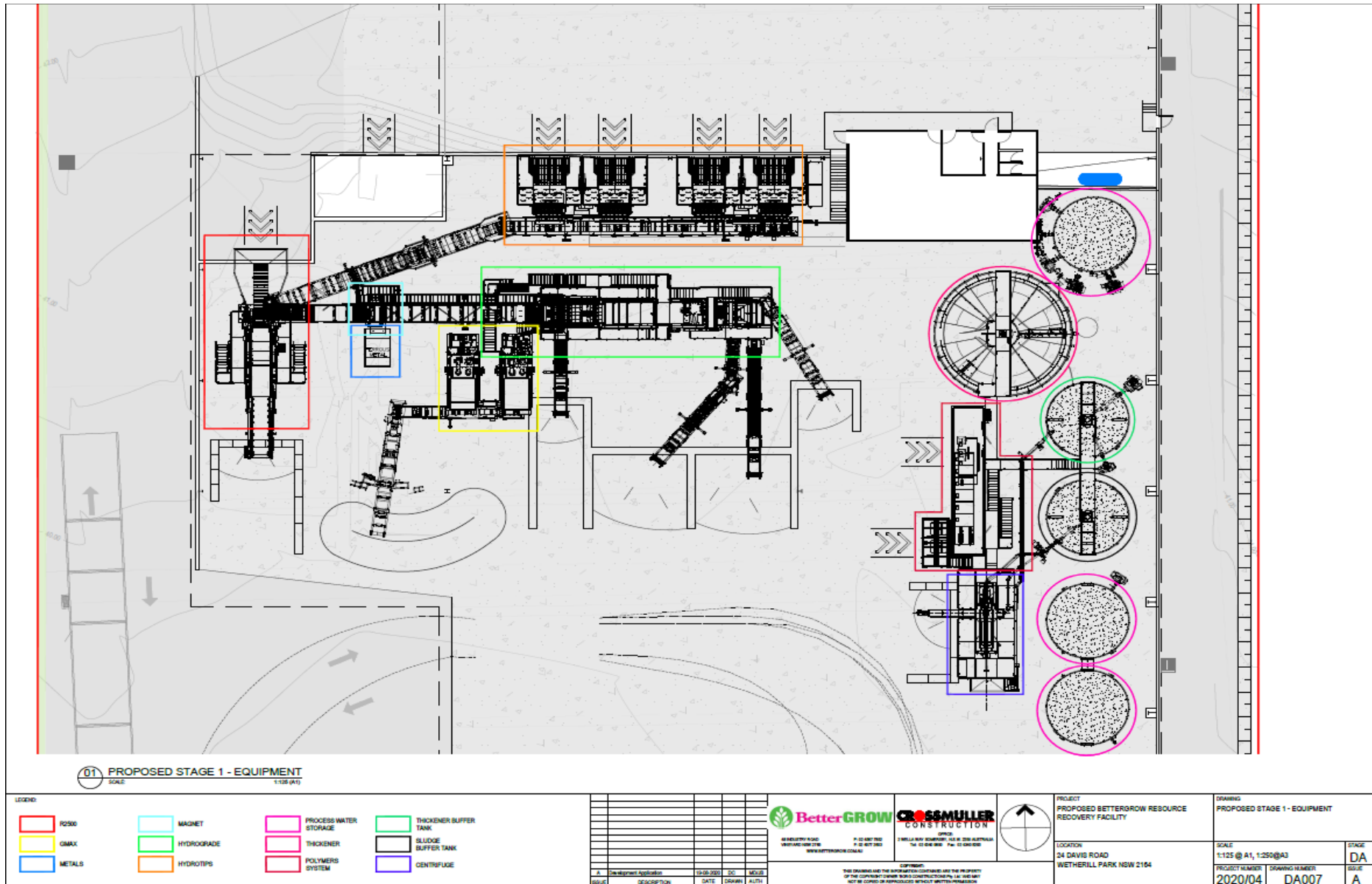


Figure 1: Extent of Facility Operating under Stage 1 (Note: plans shown are current for SSD-7401-MOD-3).

Table 3 Conditions Compliance under SSD -7401 Consolidated COA and EPL 21092.

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -7401	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 OEMP
SSD -7401-MOD-1	A2	The Development may only be carried out in: <ul style="list-style-type: none"> (e) in compliance with the conditions of this consent; (f) in accordance with the directions of the Planning Secretary; (g) in accordance with the EIS and RTS; (h) in accordance with development layout plans and drawings in the EIS (see Appendix A); (i) in accordance with the Management and Mitigation Measures (see Appendix B); and (j) in accordance with Modification Assessments. 	This OEMP
SSD -7401	A3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	This OEMP
SSD -7401	A4	The Applicant must comply with all written requirement(s) of the Planning Secretary arising from the Department's assessment of: <ul style="list-style-type: none"> (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent; (b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the consent; and (c) the implementation of any actions or measures contained in these documents. 	Section 11
SSD -7401	A5	This consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under section 95 of the EP&A Act.	Not applicable
SSD -7401	A6	The Applicant must not cause, permit or allow any materials or waste generated outside the site to be received at the site for storage, use, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by an EPL.	Section 5 Attachment 4
SSD -7401-Mod-1	A7	The Applicant must not receive or process more than 350,000 tonnes per year of waste comprising of: <ul style="list-style-type: none"> (a) 100,000 tpa of hydro-excavation, drill muds and fluids, classed as general solid waste (non-putrescible). (b) 150,000 tpa of general solid waste (non-putrescible). (c) 70,000 tpa of food and garden organics classed as general solid waste (putrescible). (d) 30,000 tpa of packaged and bulk food and liquids, classed as general solid waste (putrescible) and liquid waste respectively. 	This OEMP

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -7401	A8	The Applicant must not store more than 40,000 tonnes per year of landscape material supplies at the site and no processing of landscape supplies is permitted.	This OEMP
SSD -7401	A9	The Applicant must not store general solid (putrescible) and liquid waste at the site for more than 48 hours from the time of receipt unless in the event of an emergency and approved by the Planning Secretary.	Section 5 Attachment 4
SSD -7401	A10	The storage of compost on the site is not permitted.	Section 5
SSD -7401	A11	Stockpiles of waste within the FGO and FLD buildings must not exceed 4 m in height measured from the finished floor level.	Not relevant for Stage 1 of Operation
SSD -7401	A12	Stockpiles of product stored at the landscaping material supplies facility must not exceed 4 m in height measured from the finished ground level.	Section 5
SSD -7401	A13	The Applicant shall aim to achieve a recycling rate of 97.5% of all waste and a disposal rate of not more than 2.5% to landfill.	Section 2.7.7 Section 5
SSD -7401	A14	The Applicant must not receive, per week, more than: (a) 1,750 tonnes of general solid waste (putrescible) within the FGO building; and (b) 700 tonnes of general solid waste (putrescible) and liquid waste within the FLD building.	Not relevant for Stage 1 of Operation
SSD -7401	A15	With the approval of the Planning Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and/or (b) combine any strategy, plan or program required by this consent.	Section 11.3
SSD -7401	A16	If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program. A clear relationship between the strategy, plan or program that is to be combined must be demonstrated.	Section 11.3
SSD -7401	A17	The Applicant must retain all weighbridge records as required by the POEO (Waste) Regulation and for the life of the development. The weighbridge records must be made immediately available on request by the Planning Secretary and/or the EPA.	Section 7.1 Attachment 4
SSD -7401	A18	The Applicant must retain waste classification records for all wastes received on the site and waste disposed from the site for the life of the development. The waste classification records must be made immediately available on request by the EPA and/or the Planning Secretary.	Section 7.1 Attachment 4

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -7401	A19	Where consultation with any public authority is required by the conditions of this consent, the Applicant must: <ul style="list-style-type: none"> (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. 	Attachment 9 Attachment 12
SSD -7401	A20	The Applicant must ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.	This OEMP
SSD -7401	A21	The Applicant must ensure that all demolition associated with the Development is carried out in accordance with Australian Standard AS 2601:2001: <i>The Demolition of Structures</i> , or its latest version and the requirements of the <i>Work Health and Safety Regulation, 2011</i> .	Section 5 Attachment 12
SSD -7401	A22	The Applicant must ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the EIS and relevant requirements of the BCA. <i>Note: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the Development.</i>	Section 5
SSD -7401	A24	Prior to the construction of any utility works associated with the Development, the Applicant must obtain relevant approvals from service providers.	Section 5
SSD -7401	A25	Prior to the commencement of construction, Approved Plans must be submitted to the Sydney Water via their online service to determine if the development will have any impacts on Sydney Water assets.	Not applicable
SSD -7401	A26	Prior to the commencement of operations, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the <i>Sydney Water Act 1994</i> .	Separate to OEMP
SSD -7401	A28	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: <ul style="list-style-type: none"> (a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the Development; and (a) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the Development. 	Section 5 Attachment 12
SSD -7401	A29	The Applicant must ensure that all plant and equipment used for the Development is: <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and 	Section 5 Section 7.3

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		(b) operated in a proper and efficient manner.	Section 7.4
SSD -7401	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 3.6
SSD -7401	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 5 Attachment 4
SSD -7401	B2	Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal, except as expressly permitted by an EPL.	Section 5 Attachment 4
SSD -7401	B3	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.	Section 7.1 Attachment 4
SSD -7401	B4	The Applicant must retain all sampling and waste classification data for the life of the Development in accordance with the requirements of the EPA.	Section 7.1 Attachment 4
SSD -7401	B5	The Applicant shall only receive waste on site that is authorised for receipt by an EPL.	Section 5 Attachment 4
SSD -7401	B6	The Applicant shall ensure any waste generated on the site during construction is classified in accordance with the EPA's <i>Waste Classification Guidelines, 2014</i> or its latest version, and disposed of to a facility that may lawfully accept the waste.	Applicable during construction
SSD -7401	B7	The Applicant shall: <ul style="list-style-type: none"> (a) implement auditable procedures to: <ul style="list-style-type: none"> (i) ensure the site does not accept wastes that are prohibited; and (ii) screen incoming waste loads. (b) ensure that: <ul style="list-style-type: none"> (i) all waste types that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site; (ii) all waste received at the site must be recorded in accordance with clause 27 of the POEO (Waste) Regulation; (iii) details of the quantity, type and source of wastes received on the site must be provided to the EPA and the Planning Secretary when requested; and (iv) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste. 	Section 2.7 Section 7 Attachment 4
SSD -7401	B8	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the EPA's <i>Waste Classification Guidelines Part 1: Classifying Waste</i> , November 2014, or its latest version and dispose of all wastes to a facility that may lawfully accept the waste.	Section 2.7 Section 5 Attachment 4

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -7401	B9	All waste must be: (a) stored wholly within the designated waste storage areas; and (b) loaded and unloaded within the designated loading and unloading areas.	Section 2.7 Section 5 Attachment 4
SSD -7401	B10	All loading and unloading of general solid waste (putrescible) and liquid waste must be carried out completely within the FGO and FLD buildings.	Not relevant for Stage 1 of Operation
SSD -7401	B11	From the commencement of operation, the Applicant must implement a Waste Monitoring Program for the Development. The program must: (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; (b) include suitable provision to monitor the: (i) quantity, type and source of waste received on site; (ii) quantity, type and quality of the outputs produced on site; and (c) ensure that: (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and (ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste, including asbestos.	Attachment 4
SSD -7401	B12	Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the Development to the satisfaction of the Planning Secretary. The Waste Management Plan must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The Plan must: (a) detail the type and quantity of waste to be received during operation of the Development; (b) include procedures for diversion of waste to other facilities during unexpected machinery breakdown; and (c) details the requirements for non-conforming waste handling and removal.	Attachment 4
SSD -7401	B13	The Applicant must: (a) not commence operation until the Waste Management Plan is approved by the Planning Secretary; and (b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary	Attachment 4
SSD -7401	B15	The Applicant must: (a) retain disposal records for all waste disposed of under the CDWMP* for 4 years and provide these to the EPA as requested; (b) not commence construction until the CDWMP is approved by the Planning Secretary; and (c) implement the most recent version of the CDWMP approved by the Planning Secretary. *Construction condition – potential administration component during operation	Section 7.1 Attachment 4

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -7401	B17	All reasonable steps must be taken to minimise dust generated during all works authorised by this consent.	Section 5. Attachment 2
SSD -7401	B19	Prior to the commencement of operations, the Applicant must: <ul style="list-style-type: none"> (a) ensure the interior of the FGO and FLD building is designed to facilitate wash down and leachate capture; and (b) seal all trafficable areas. 	Not relevant for Stage 1 of Operation
SSD -7401	B20	During operations, the Applicant must ensure that: <ul style="list-style-type: none"> (a) all vehicles on site do not exceed a speed of 20 kilometres per hour; (b) regular watering is conducted within the landscaping material supplies area to ensure dust impacts are minimised; and (c) air quality and odour impacts of the Development are minimised during adverse meteorological conditions. 	Section 5 Attachment 2
SSD -7401	B21	The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Section 5 Attachment 2
SSD -7401	B22	The Applicant must: <ul style="list-style-type: none"> (a) operate the Development so that air and odour emissions are minimised during all meteorological conditions (b) implement best management practice, including all reasonable and feasible air and odour emission mitigation measures to minimise emissions from the Development, including but not limited to an odour management system comprising of: <ul style="list-style-type: none"> (i) a system which ensures the FGO and FLD buildings would be held under negative pressure and fitted with automatically closing heavy vehicle roller doors; (ii) installation of an air extraction device(s) which directs the air to eight carbon filters with a 99.9% odour elimination efficiency rate; (iii) installation of a volatile organic compounds (VOC) breakthrough detection alarm in the FGO building which must be triggered once the carbon filters reach 90% saturation; (iv) ducting the air from the FLD building to the FGO building to ensure the air is treated via the eight carbon filters; (v) biological inoculums to deodorise plant and equipment areas; and (vi) the installation of misting sprays above the truck entry/exit in the FGO and FLD building to suppress odour emissions (vii) conduct weekly cleaning of any tipping areas within the FGO or FLD building where interior walls have been contaminated with putrescible waste; (c) regularly maintain on-site surfaces to prevent dust re-entrainment from vehicle movements and other equipment use; (d) in accordance with the OEMP ensure the regular wash down of the FGO and FLD buildings to ensure a build-up of waste and odour does not occur; 	FGO and FLD operations not relevant for Stage 1 of Operation

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<ul style="list-style-type: none"> (e) ensure regular maintenance of the odour management system; and (f) record and respond to any air quality or odour complaints within 48 hours. 	
SSD -7401	B23	Prior to acceptance of any waste at the FGO or FLD building, the odour management system identified in Condition B22(b) must be installed and operational.	Not relevant for Stage 1 of Operation
SSD -7401-MOD-1	B24	<p>Prior to commencement of operation, the Applicant must prepare an Air Quality and Odour Management Plan (AQOMP) to the satisfaction of the Planning Secretary. The AQOMP must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The AQOMP must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s) in consultation with the EPA; (b) describe the proactive and reactive measures that would be implemented on site to ensure all reasonable and feasible measures are employed to minimise air quality and odour emissions, including details of the odour management system and all other operational air quality mitigation measures; (c) detail on a site plan the location of any air quality and odour management infrastructure; (d) include an ongoing monitoring program with details of location, frequency and duration of monitoring activities; (e) detail the contingency measures to be deployed to minimise air quality and odour impacts with well-defined triggers for their deployment; and (f) include a system for monitoring and responding to any complaints 	Attachment 2
SSD -7401-MOD-1	B25	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence operation until the AQMP required by Condition B24 is approved by the Planning Secretary; and (a) implement the most recent version of the AQMP approved by the Planning Secretary for the duration of the Development. 	Not relevant for Stage 1 of Operation
SSD -7401	B26	<p>The Applicant must carry out an Odour Audit of the Development no later than six months after the commencement of operation of the FGO and FLD buildings. The audit must:</p> <ul style="list-style-type: none"> (a) be carried out by a suitably qualified, experienced and independent person(s), whose appointment has been endorsed by the Planning Secretary; (b) be carried out in accordance with the methodologies set out in the relevant EPA guidelines; (c) identify all significant odour sources at the site; (d) monitor odour and audit the Development whilst the FGO and FLD buildings are in full operation; (e) include a summary of air and odour emission related complaints and any actions that were carried out to address the complaints; (f) validate the Development in consultation with the EPA against the odour predictions in the EIS and provide a comparison between the monitoring results and the relevant EPA guidelines; (g) review the design and management practices of the Development against the industry best practice for odour emissions; and 	Not relevant for Stage 1 of Operation

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<p>(h) include an action plan that identifies, prioritises and provides timeframes for the implementation of any additional odour emission mitigation measures that may be necessary to reduce odour emissions to ensure the relevant odour criteria is met.</p> <p>Note: The Odour Audit may be prepared so that it addresses the requirements of this consent and the EPL for the Development.</p>	
SSD -7401	B27	Within six months of commissioning of the Odour Audit required by Condition B26, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the Odour Audit report to the satisfaction of the Planning Secretary, together with the Applicant's response to any recommendations contained in the Odour Audit report.	Not relevant for Stage 1 of Operation
SSD -7401	B28	The Applicant must comply with any reasonable requirement(s) of the Planning Secretary arising from the Odour Audit.	Not relevant for Stage 1 of Operation
SSD -7401	B29	Any leachate generated on the site must be captured and re-used on-site or disposed of at a licenced facility, and no leachate is permitted to enter the stormwater system.	Section 5 Attachment 7
SSD -7401	B30	The Applicant must ensure all wastewater is discharged to sewer in accordance with a Trade Waste Agreement with Sydney Water or tankered offsite for appropriate disposal at licenced facilities or further processing	Section 5 Attachment 4 Attachment 7
SSD -7401	B31	The Applicant must install an alarm system which sounds and flashes once the amount of wastewater within the wastewater tanks reaches 80% of the total capacity.	Section 5
SSD -7401	B32	Wastewater from the hydro-excavation, drill mud and fluids processing facility is not permitted to enter the stormwater management system.	Section 5 Attachment 7
SSD -7401-MOD-1	B33	<p>Prior to commencement of operation of the hydro-excavation, drill mud and fluid processing facility, the Applicant must ensure:</p> <ul style="list-style-type: none"> (a) the wastewater management system is operational; and (b) the wastewater tanks associated with the hydro-excavation, drill mud and fluid processing facility are bunded in accordance with: <ul style="list-style-type: none"> (i) all relevant Australian Standards; and (ii) NSW EPA's Spill Management Bunding guidelines. 	Attachment 7
SSD -7401	B34	<p>Prior to the commencement of operations of the FLD building, the Applicant must:</p> <ul style="list-style-type: none"> (a) ensure the base of the FLD tip pit is located at or above 44.5 m AHD (0.5 m above the groundwater table); (b) line the FLD building tip pit with an impermeable barrier to prevent leachate from entering groundwater; (c) install an alarm within the two 27 kL liquid food waste tanks which sounds and flashes once 75% of the total capacity is reached; and 	Not relevant for Stage 1 of Operation

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		(d) ensure the liquid food waste tanks are bunded in accordance with all relevant Australian Standards and NSW EPA's Spill Management Bunding guidelines.	
SSD -7401	B35	Any liquid food waste generated within the FLD building must be contained within the two 27 kL tanks within the FLD building.	Not relevant for Stage 1 of Operation
SSD -7401	B36	Every 12 months from commencement of the FLD operations, the Applicant must conduct groundwater monitoring and demonstrate that leachate from the FLD facility tip pit is not entering groundwater. The groundwater monitoring must be conducted by a suitably qualified and experienced expert whose appointment has been endorsed by the Planning Secretary.	Not relevant for Stage 1 of Operation
SSD -7401	B37	Within two months of the groundwater monitoring being conducted, the Applicant must submit a Groundwater Report to the Planning Secretary which: (a) includes a plan showing the location of the groundwater monitoring well which was sampled in accordance with Condition B36; (b) details the baseline data, groundwater levels and monitoring results against the relevant criteria; (c) considers whether leachate from the FLD tip pit has entered groundwater; and	Not relevant for Stage 1 of Operation
SSD -7401	B38	Should it be determined that leachate has entered groundwater, the Applicant is not permitted to store waste within the FLD tip pit until the leak has been rectified.	Not relevant for Stage 1 of Operation
SSD -7401	B39	The Development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	Section 5 Attachment 7
SSD -7401	B40	Prior to the commencement of construction, the Applicant must prepare a Flood Emergency Response Plan (FERP) for the Development in consultation with Council and to the satisfaction of the Planning Secretary. The Plan must form part of the CEMP and OEMP required by Conditions C1 and C4 and must: (a) be prepared by a suitably qualified and experienced person(s); (b) include details of: (i) the flood emergency responses for both construction and operation phases of the Development; (ii) predicted flood levels; (iii) flood warning time and flood notification; (iv) assembly points and evacuation routes; (v) evacuation and refuge protocols; and (vi) awareness training for employees and contractors. <i>Construction condition with ongoing compliance requirement during operation.</i>	Section 4.7 Section 5 Attachment 6
SSD -7401	B41	The Applicant must: (a) not commence construction until the FERP required by Condition B40 is approved by the Planning Secretary; and	Section 4.7 Section 5 Attachment 6

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		(b) implement the most recent version of the FERP approved by the Planning Secretary for the duration of the Development. <i>Construction condition with ongoing compliance requirement during operation.</i>	
SSD -7401	B42	All floor levels must be no lower than the 1% Annual Exceedance Probability flood plus 0.5 m of freeboard.	Attachment 6
SSD -7401-MOD-3	B43	The Applicant must design, install and operate a stormwater management system for the Development. The system must: <ul style="list-style-type: none"> (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the EIS and Modification Assessments and applicable Australian Standards; (c) ensure that the system capacity has been designed in accordance with <i>Australian Rainfall and Runoff</i> (Engineers Australia, 2016) and <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> (Landcom, 2004); (d) divert existing clean surface water around operational areas of the site; (e) prevent firewater and contaminated water from entering the stormwater system; and 	Section 5 Attachment 3 Attachment 7
SSD -7401-MOD-3	B46	The Applicant must ensure the stormwater generated from the development is directed to the on site in-ground concrete pit and/or Ecoceptor prior to being released to Council's street kerb and gutter.	Section 5 Attachment 3 Attachment 7
SSD -7401	B47	Within 6 months of the operation of the landscaping materials supplies facility, the Applicant must demonstrate to the Planning Secretary that the following stormwater reduction targets for the site are being met: <ul style="list-style-type: none"> (a) Gross pollutants – 90%. (b) Total suspended solids (TSS) - 80%. (c) Total phosphorous (TP) – 55%. (d) Total nitrogen – 40%. 	Not relevant to Stage 1 of operation
SSD -7401	B48	If the Targets in B47 are not met, the Applicant must install additional mitigation measures to meet the targets in B47.	Not relevant to Stage 1 of operation
SSD -7401-MOD-3	B49	Prior to the commencement of operation, the Applicant must prepare a Water Management Plan to the satisfaction of the Planning Secretary. The Water Management Plan must form part of the OEMP required by Condition C4 and be prepared in accordance with Condition C7. The Water Management Plan must: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) detail water use, disposal and management on-site; (c) detail the water licence requirements for the development i.e trade waste; (d) detail how leachate, stormwater and wastewater would be managed, including how any changes approved by modification applications have been addressed; 	Attachment 7

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<ul style="list-style-type: none"> (e) detail any trigger levels to ensure overflow of wastewater and leachate at the site does not occur; (f) contain a Surface Water Management Plan, including: <ul style="list-style-type: none"> (i) a program to monitor: <ul style="list-style-type: none"> a. surface water flows and quality; b. surface water storage and use; and (ii) sediment and erosion controls; (iii) surface water impact assessment criteria, including trigger levels for investigating and potential adverse surface water impacts; and (iv) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria. (g) contain a Groundwater Management Plan, including: <ul style="list-style-type: none"> (i) baseline data on groundwater levels and quality; (ii) a program to monitor groundwater levels and quality; (iii) groundwater impact assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; and (iv) a protocol for the investigation and mitigation of identified exceedances of the groundwater impact assessment criteria. 	
SSD-7401	B50	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) not commence operation until the Water Management Plan required by Condition B49 is approved by the Planning Secretary; and (b) implement the most recent version of the Water Management Plan approved by the Planning Secretary for the duration of the Development. 	Attachment 7
SSD-7401	B51	<p>To ensure that chemical spills and fire-water are contained on-site, prior to the commencement of operations, the Applicant must:</p> <ul style="list-style-type: none"> (a) prepare an Emergency Response Plan as part of the OEMP as required by Condition C4 which details the responsibilities and procedures should a chemical spill or fire occur on the site; (b) ensure the stormwater isolation valve functionality has a fail-safe function on power failure which automatically closes the valve. The stormwater isolation valve must remain in the closed position until a manual over-ride function is initiated upon confirmation that stormwater isolation is no longer required or once any contaminated water is disposed via trade waste or at a site that can lawfully receive the waste; and (c) ensure the location of the stormwater isolation valve and any associated controls are clearly identified on the site's fire hydrant block plan, fire sprinkler block plan and the site plan located within the site's Emergency Response Plan. 	Attachment 8
SSD-7401	B53	<p>Prior to the commencement of any operations, the Applicant must provide a total of 31 car parking spaces (including two disabled car spaces), all car parking must be constructed in accordance with the latest version of AS 2890.</p>	Attachment 9

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD-7401-MOD-1	B54	<p>The Applicant must ensure:</p> <ul style="list-style-type: none"> (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest version of AS 2890.1 and AS 2890.2; (b) the western entry/exit must be widened to meet RMS heavy vehicle access requirements and be submitted to Council for approval; (c) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines; (d) the Development does not result in any vehicles queuing on the public road network in particular Davis Road; (e) heavy vehicles and bins associated with the Development are not parked on local roads or footpaths in the vicinity of the site; (f) all vehicles are wholly contained on site before being required to stop; (g) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; (h) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times; (i) the eastern driveway is reserved for service and emergency access only; (j) the various operating areas must be clearly marked and signage erected to direct heavy vehicles to the relevant operating areas; and (k) pedestrian paths on site must be clearly marked at all times. 	<p>Section 5 Attachment 9</p>
SSD-7401	B55	<p>Prior to the commencement of operations, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the Development to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by Condition C7. The OTMP must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council; (c) detail the measures that are to be implemented to ensure road safety and network efficiency is maintained including restricting queuing or parking of vehicles on Davis Road and re-directing heavy vehicles during peak times so that queuing is appropriately managed; (d) detail heavy vehicle routes, driveway widening, access and parking arrangements; (e) include a Driver Code of Conduct to: <ul style="list-style-type: none"> (i) minimise the impacts on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; (iv) ensure truck drivers use specified routes; and (v) include a program to monitor the effectiveness of these measures. (f) include a Traffic Control Plan (TCP) detailing: <ul style="list-style-type: none"> (i) the location of signage to direct heavy vehicles to the relevant operating areas; (ii) the on-site measures to be implemented to control the movement of trucks in, out and onsite, such as 'left turn only' signs and a traffic controller; and 	<p>Attachment 9</p>

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		(iii) provisions for requiring a dedicated traffic controller to stop exiting trucks to allow an entering truck to manoeuvre into the site unhindered.	
SSD-7401	B56	The Applicant must: (a) not commence operation until the OTMP required by Condition B55 is approved by the Planning Secretary; and (b) ensure the OTMP (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the Development.	Attachment 9
SSD-7401-Mod-1	B57	The Applicant must comply with the hours detailed below: (a) For demolition and construction: (i) Monday to Friday – 7am to 6pm. (ii) Saturday – 8am to 1pm. (iii) Sunday – no works permitted. (b) For operation: (i) Hydro-excavation, drill mud and fluids processing facility – 24 hours, Monday to Sunday for receipt, dispatch and processing. (ii) FGO Facility - 24 hours, Monday to Sunday for receipt, dispatch and processing. (iii) FLD Facility - 24 hours, Monday to Sunday for receipt, dispatch and processing. (iv) Landscaping Material Supplies Factory - 24 hours, Monday to Sunday for receipt and dispatch.	Section 2.7.3
SSD-7401	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 Secretary; (c) 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. Note: this condition is no longer wholly relevant as the Facility may operation 24 hours a day, 7 days a week.	Section 2.7.3
SSD-7401	B60	The Applicant must ensure that noise generated by operation of the Development does not exceed the noise limits, measured in dB(A) at all residential receivers as per below: (a) Day - $L_{Aeq(15\text{ minute})} - 35$. (b) Evening - $L_{Aeq(15\text{ minute})} - 35$. (c) Night - $L_{Aeq(15\text{ minute})} - 35$. (d) Night - $L_{A1(1\text{ minute})} - 45$. Note: Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.	Section 5 Section 7.8

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD -7401	B61	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) implement best practice, including all noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the development; (b) minimise the noise impacts of the development during adverse meteorological conditions; (c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant and equipment is not being used operationally until fully repaired; and (d) regularly assess noise emissions and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent 	Section 5
SSD -7401	B62	The Applicant must ensure that all its vehicles are fitted with broadband reversing alarms only.	Section 5
SSD -7401	B64	<p>During the commissioning of the hydro-excavation, drill mud and fluids processing equipment the Applicant must conduct vibration testing on vibration generating equipment. The vibration testing must be conducted by a suitably qualified and experienced person(s). Should exceedances occur, the Applicant must implement the following mitigation measures:</p> <ul style="list-style-type: none"> (a) equipment causing the vibration should be isolated on resilient mounts from any connective structures; (b) inertia blocks should be considered to add system mass to reduce vibration; and (c) balance weights to correct rotation of poorly balanced parts. 	Undertaken separate to this OEMP
SSD -7401	B65	Evidence of the vibration testing and outcomes must be submitted to the Planning Secretary and the EPA within two months of conducting the testing.	Undertaken separate to this OEMP
SSD -7401	B66	<p>The Applicant must store all chemicals, fuels and oils used on-site in accordance with:</p> <ul style="list-style-type: none"> (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's 'Storing and Handling of Liquids: Environmental Protection – Participants Handbook' if the chemicals are liquids. <p>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	Section 5 Attachment 8
SSD -7401	B67	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Section 5
SSD -7401	B68	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with:</p> <ul style="list-style-type: none"> (a) all relevant Australian Standards; (b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and 	Section 5

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<p>(c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA,1997).</p> <p>In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	
SSD -7401	B69	<p>The Applicant must:</p> <p>(a) ensure all waste loads are covered unless fully contained with building(s); and</p> <p>(b) maintain the site in a clean and tidy state at all times.</p>	<p>Section 5 Attachment 4 Attachment 9</p>
SSD -7401	B70	<p>The Applicant must:</p> <p>(a) implement suitable measures to manage pests, vermin and declared noxious weeds on the site; and</p> <p>(b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.</p> <p>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.</p>	<p>Section 5</p>
SSD -7401	B72	<p>Prior to the commencement of construction, the Applicant must prepare a Building Material Schedule and Landscape Plan for the Development to the satisfaction of the Planning Secretary. The Schedule and Plan must:</p> <p>(c) be prepared in consultation with Council;</p> <p>(d) be consistent with the Fairfield City Council Development Control Plan 2013;</p> <p>(e) include a schedule of the building materials and colours to be used on the facades; and</p> <p>(f) include details on landscaping including species and number of plants to be planted and the watering regime.</p> <p>Only native species are to be used for landscaping purposes, and species must be selected which benefit the Cumberland Plain Woodland species present on the site.</p> <p>Note: Construction condition with ongoing compliance required during operation (see Condition B73)</p>	<p>Not applicable</p>
SSD -7401	B73	<p>The Applicant must:</p> <p>(a) not commence construction until the Building Material Schedule and Landscape Plan required by Condition B72 is approved by the Planning Secretary; and</p> <p>(b) ensure the Building Material Schedule and Landscape Plan (as required and approved by the Planning Secretary from time to time) is implemented for the operational life of the Development.</p> <p>Note: Construction condition with ongoing compliance required during operation</p>	<p>Attachment 11</p>
SSD -7401	B76	<p>The Applicant must ensure the lighting associated with the Development:</p> <p>(a) complies with the latest version of AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting; and</p>	<p>Section 5</p>

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		(b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	
SSD -7401	B77	All signage and fencing must be erected in accordance with the Development plans included in the EIS/RTS. Note: This condition does not apply to temporary construction and safety related signage and fencing.	Section 5
SSD -7401	B78	The Applicant must cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered. If human remains are uncovered, you must immediately stop work, not further disturb the remains and notify NSW Police. OEH and the Aboriginal community must be contacted if the remains are suspected to be of Aboriginal origin. If other Aboriginal objects are discovered, you must immediately stop work, not further disturb the objects and notify OEH by calling Environment Line on 131 555. Works must not resume in the designated area until the relevant written consent is received from NSW Police and/or OEH. Any Aboriginal objects discovered must be registered on the Aboriginal Heritage Management Information System (AHIMS), in accordance with section 89A of the National Parks and Wildlife Act 1974.	Section 5
SSD -7401	B79	The Applicant shall: (a) maintain the perimeter fence and security gates on the site; and (b) ensure that the security gates on site are locked whenever the site is unattended.	Section 5
SSD -7401	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	Attachment 12
SSD -7401-Mod-1	C4	The Applicant must prepare an Operational Environmental Management Plan (OEMP) to the satisfaction of the Planning Secretary. The OEMP must: (a) be approved by the Planning Secretary prior to the commencement of operations; (b) be prepared by a suitably qualified and experienced expert;	This OEMP

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<ul style="list-style-type: none"> (c) provide the strategic framework for environmental management of the Development; (d) identify the statutory approvals that apply to the Development; (e) provide a legible site plan which shows all the various operations on the site; (f) detail the FGO and FLD cleaning and maintenance regime; (g) include the details of the groundwater monitoring as required by Condition B36; (h) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development; (i) describe the procedures that would be implemented to: <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; and (v) respond to emergencies. (j) include the following environmental management plans: <ul style="list-style-type: none"> (i) Waste Management Plan (Condition B12); (ii) Air Quality and Odour Management Plan (see Condition B24); (iii) Water Management Plan (see Condition B49); (iv) Emergency Response Plan that addresses flooding, chemical spills and fire water containment (see Condition B51 and B40); (v) Operational Traffic Management Plan (see Condition B55); and (vi) Conceptual Decommissioning Management Plan (see Condition B80). 	
SSD -7401	C5	The Applicant must operate the Development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time), unless otherwise agreed by the Secretary.	This OEMP
SSD -7401	C6	The Applicant must submit a Conditions Compliance Report to the Planning Secretary with any Environmental Management Plans, to track compliance with the conditions of this approval during the construction and operation of the Development. The Conditions Compliance Report must include procedures for rectifying any non-compliance identified.	Section 7.9 Attachment 10
SSD -7401	C7	<p>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:</p> <ul style="list-style-type: none"> (a) detailed baseline data (b) a description of: <ul style="list-style-type: none"> (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures/criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures. 	This OEMP Attached sub-plans

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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. 	
SSD-7401	C8	<p>Within three months of:</p> <ul style="list-style-type: none"> (a) approval of a modification; (b) approval of an annual review under Condition C9; (c) submission of an incident report under Condition C10; and (d) completion of an audit under Condition C14. <p>The Applicant must review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Planning Secretary.</p> <p>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</p>	Section 11.1
SSD-7401	C9	<p>Each year, the Applicant must review the environmental performance of the Development to the satisfaction of the Planning Secretary. This review must:</p> <ul style="list-style-type: none"> (a) describe the development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year; (b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of these results against the: <ul style="list-style-type: none"> (i) the relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent; (iii) the monitoring results of previous years; and (iv) the relevant predictions in the EIS. (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; 	Section 7.9 Section 7.13 Section 11.2

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
		<ul style="list-style-type: none"> (d) identify any trends in the monitoring data over the life of the Development; (e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the Development. 	
SSD-7401	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 the Department 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 Planning Secretary no later than 14 days after the incident or potential incident.	<p>Section 6.2.2 Section 7.1. Section 7.13</p>
SSD-7401	C11	The Applicant shall maintain a register of accidents, incidents and potential incidents. The register shall be made available for inspection at any time by the independent Hazard Auditor and the Department.	<p>Section 6.2.6 Section 7.1. Section 7.13</p>
SSD-7401	C12	The Applicant must provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Section 7.12
SSD-7401	C13	<p>Within one year of the commencement of operation, and every three years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (audit) of the Development. Division 2B of Part 6 of the EP&A Act applies to these audits, which are for the purposes of ascertaining information in relation to the environmental performance of the Development and the adequacy of strategies, plans and programs. Audits must:</p> <ul style="list-style-type: none"> (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals); (d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and (e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents. <p>Note: This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Planning Secretary.</p>	<p>Section 7.11 Section 7.13</p>

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN OEMP
SSD-7401	C14	Within three months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Applicant must submit a copy of the audit report to the Planning Secretary, and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The Applicant must implement these recommendations to the satisfaction of the Planning Secretary.	Section 7.11 Section 7.13
SSD-7401	C15	The Applicant must: <ul style="list-style-type: none"> (a) make copies of the following publicly available on its website: <ul style="list-style-type: none"> (i) the documents referred to in Condition A2; (ii) all current statutory approvals for the Development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (v) a complaint register updated on a monthly basis; (vi) the annual reviews of the Development; (vii) any independent environmental audit of the Development and the Applicant's response to the recommendations in any audit; (viii) any other matter required by the Planning Secretary; and (ix) keep this information up to date, to the satisfaction of the Planning Secretary. 	Section 7.12
EPL 21092	Licence information	Please see Attachment 13 for information items relating to the application of EPL 21092.	Attachment 13

2.4 Land Ownership

The subject site is currently owned by Davis Road Property Development (Davis Road Property Development) Pty Ltd of which Bettergrow Pty Ltd (Bettergrow) hold a 50% share, however in this instance the sole Applicant was Bettergrow. Owners consent has been obtained for the lodgement of the approved Development Applications (DAs) and supporting documentation.

Operation of the Facility will be undertaken by reDirect Recycling on behalf of Bettergrow.

2.5 Sensitive Receivers

2.5.1 Commercial and Industrial Receivers

The site is located within the Wetherill Park Industrial Estate, zoned IN1 - General Industrial under the *Fairfield Local Environmental Plan 2013* (FLEP), and is surrounded by a number of commercial and industrial businesses which operate from Monday to Sunday for up to 24 hours per day. Notably, the following facilities are located within close proximity to the subject site:

- Immediately west of the subject site at 23 Davis Road is a metal recycling facility operated by One Steel Recycling Pty Ltd. The facility has an Environmental Protection Licence (EPL 1977) for scrap metal processing
- West of the subject site at 22 Davis Road is a manufacturing facility for surfactants, phosphates and chemicals operated by Albright and Wilson (Australia) Ltd. The facility has an EPL (1974) for chemical and dangerous goods production and soap and detergent production
- South-west of the subject site at 20 Davis Road is a resource recovery facility operated by Veolia. The facility has an EPL (4548) for treatment of hazardous and other wastes, waste storage - hazardous, restricted solid, liquid, clinical and related waste, asbestos waste and other types of waste registered under SUEZ Recycling and Recovery Pty Ltd.
- South-east of the subject site at 6 Davis Road is a waste management and recycling facility operated by Nationwide Oil Pty Ltd. The facility has an EPL licence (854) for the treatment of hazardous and other waste and recovery of waste oil
- East of the subject site at 30 Davis Road is a petroleum product and fuel production facility operated by Valvoline (Australia) Pty Ltd. The facility has an EPL (3182) for petroleum products and fuel production and petroleum products storage.
- East of the subject site at 29C Davis Road is an e-waste and paper waste and recycling facility managed by SHRED-X Pty Ltd. The facility has an EPL licence (21426) for the recovery of general waste and waste storage.

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

Table 4 Properties in vicinity of Subject Site

NEIGHBOURING PROPERTIES		
Business	Address	Contact Number / Contact Method
Onesteel Recycling	23 Davis Rd	(02) 9203 1611
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

NEIGHBOURING PROPERTIES		
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
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

Immediately north of the site are Sydney Water supply pipelines and Prospect Reservoir and parkland. Prospect Creek is further north, approximately 500 m from the site.

The site is located in close proximity to major road networks including the M4 Western Motorway and the Great Western Highway to the north, Smithfield Road to the east, Horsley Drive to the south and the M7 Westlink to the west.

2.5.2 Residential Receivers

The nearest residential receivers are located within the suburb of Wetherill Park, approximately 1.5 km to the south-east of the site on Maugham Crescent, off The Horsely Drive. Generally, the areas south of The Horsley Drive are dominated by residential dwellings.

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

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

2.5.3 Schools

The nearest school is Aspect Western Sydney School, which is approximately 1.7km to the south-east of the Subject Site.

2.5.4 Waterway

Stormwater from the existing site is conveyed from the high point in the north to Davis Road in the south via an existing pit and pipe network and overland flow paths.

The existing Council owned stormwater network within Davis Road conveys stormwater to the east discharging into an unnamed concrete lined channel running from the south-west to the north-east of the Wetherill Park industrial estate. The concrete channel discharges into Prospect Creek near Widemere Road, approximately 1 km east of the site.

The site lies within the Georges River catchment which covers an approximate area of 960 km². Flowing through south-western Sydney, the Georges River eventually discharges into Botany Bay. The primary tributary of the Georges River in the area is Prospect Creek which begins at Prospect Reservoir and flows for approximately 26 km through the local government areas of Holroyd, Fairfield, Liverpool and Bankstown, before discharging into the Georges River downstream of Chipping Norton Lake. The site is approximately 500 m south of Prospect Creek and 800 m south of Prospect Reservoir.

2.5.5 Biodiversity

Vegetation located in the subject site has been identified by MJD Environmental Pty Ltd (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 (SAIL).

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.

2.6 Key contact details

Table 5 lists the key contacts for the Facility.

Table 5 Resource Recovery and Recycling Facility Contact Details.

LOCATION / PERSONNEL	CONTACT DETAILS
Wetherill Park Resource Recovery and Recycling Facility	To be arranged
Customer Inquiries	Wella Way Head Office 02 4340 9800
Emergency Response Spills	To be arranged
Complaints and Feedbacks	Wella Way Head Office 02 4340 9800

Table 6 lists the contact details for the regulatory authorities that have an interest in the operations of the Facility.

Table 6 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

2.7 Site processes and operations

2.7.1 Operational features

Key operational features of the development included as part of Stage 1 of operation are listed in **Table 7**.

Table 7 Facility operational features

STRUCTURE	DESCRIPTION
Office and Amenities (lower level)	An office, meeting room and bathroom amenities are located in the main administration building at the entrance to the site (east of the main driveway). Additional office and amenities are located adjacent to the drill muds facility control room, located at the interface of the lower and mid-level of the Subject Site.
Access (lower level)	All vehicles enter via a combined ingress/egress access driveway, providing a 12.5 metre (m) width at the western property boundary and facilitating connectivity between the off-street parking and internal heavy vehicle circulation areas. An additional ingress/egress driveway, with a width of 5.5 m has also been installed adjacent to the eastern property boundary. This will be restricted to use by staff accessing the offices and will remain clear for emergency use.
Weighbridge (lower level)	One weighbridge will initially be installed within the driveway west of the drill mud processing plant. In the long-term, additional weighbridges may be constructed as site capacity increases.
Car parking (lower level)	Paved parking spaces, installed in accordance with relevant Australian Standards, will be provided.
Processing plant and equipment (lower/mid-levels)	A partially enclosed shed is to be constructed over the drill mud processing plant and equipment, including the truck unloading area. The total area of the shed is to be 7,970 m ² . The drill mud processing plant and equipment will consist of 4 x hydro-tips and 1 x tip-pit. Bulk landscape material storage bays inside the shed.
Rainwater harvesting system (lower/mid-levels)	The roof of the semi-enclosed process shed is to be outfitted with downpipes to direct roof water runoff into above-ground rainwater harvesting tanks for reuse on site. As per SSD-7401-MOD-3, the rainwater tank will be located inside the drill mud facility shed in close proximity to the control room on the middle level of site.

STRUCTURE	DESCRIPTION
Stormwater system (lower/mid-levels)	The stormwater system is comprised of four stages: <ul style="list-style-type: none"> • Rainwater tank: 5 kL rainwater tank • Gravity driven stormwater pipe network • Sand filter detention pit: The sand filter provides media-based filtration. The media within the detention pit consists of highly permeable sand which effectively removes suspended solids and nutrients. The basin has been designed to allow for 600 mm of extended detention, at which point water will overflow an internal weir and will be directed to the outlet sump. Design specifications are provided in the stormwater management plan (Eclipse, 2021). • SPEL Ecoceptor 6000 Series: SPEL Ecoceptor is a vertically configured pollutant trap, sediment and light non-aqueous phase liquid (LNAPL) separator suitable for low-risk applications. The Ecoceptor separates sediment, silt, total suspended solids, oil and grease, litter and hydrocarbon spills. The Ecoceptor will be installed as an underground fibreglass tank that can store up to 11,500 L of pollutants. Details are provided in SSD-7401-MOD-3.

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

The key processes at the site are detailed below.

1. Weighing loads at the weighbridge and data recording

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

The weighbridge docket will contain the following information: Date; Gross, tare and net weights; Product description; Origin; Supplier (if necessary i.e. different from origin); Carrier; Truck registration; Drivers name and signature and other details as per the EPA's Benchmark Weighbridge Requirements (see Attachment 8 – Weighbridge Management Procedure). This information will be used to submit the monthly WARRP report. The weighbridge will also have lasers to ensure trucks are fully on the bridge before being weighed and cameras with numberplate recognition.

Accepted vehicles are directed to the waste tipping area inside the warehouse and once tipping is complete will proceed to the exit weighbridge to complete the transaction.

2. Tipping and inspection of waste

There are 2 major categories of waste that will be accepted on site. Wet and Dry.

Wet – A sample will be taken from the tank of the truck. Checks will be made for EC and pH levels. The inspector will also check for visual or odorous contaminants. If there are any concerns or non-compliances the load will be rejected, directed to leave site for an appropriate facility and details of the load recorded on the rejected load register. Samples will be labelled and kept as per EPA sample holding requirements.

Dry – After initial inspection at the weighbridge there will be a check on validation report or test results the loads will be tipped and inspected further for contamination that wasn't obvious while in the truck. Once cleared the material will be processed through the wash plant. If contaminants are found the material will be re loaded and the truck directed to leave site for an appropriately licenced facility. All rejected loads will be recorded on the rejected load register.

3. Processing of conforming material

All material is processed through the same system where it will be washed and separated. The only difference between wet and dry material processing is the entry point to the system. Wet material is loaded into the hydrotips which immediately start to separate the liquids from the solids as follows:

- Large solids (i.e. rock, concrete etc) are sent to a scalping screen for further separation.
- Smaller solids, including aggregates and sand, are sent to the trommel for scrubbing and removal of potential contaminants.
- Liquids and sub 5 millimetre (mm) materials are pumped to a dual stage washing and recycling system where they are dewatered. Coarse sediments and grit are removed at this stage.
- All remaining liquids and fine materials that are not captured are pumped to a buffer tank.

The solids that are separated by the Hydrotip are conveyed to the R2500 screen. The R2500 is the entry point for dry material. In addition, the R2500 processing will produce an oversize material (over 80mm). This material may be fed through

the machine a second time if easily broken apart, otherwise the material will be taken off site, likely to a company with a licence to crush material.

The liquids in the buffer tank are treated with a polymer, coagulants, then processed through a clarifier and a centrifuge. Clean water is then pumped to a storage tank (process water storage tank) for reuse within the system. Excess is discharged to sewer under a Trade Waste Agreement (TWA) with Sydney Water (see **Section 2.7.8**).

See **Figure 3** for an overview of drill muds processing at the Facility.

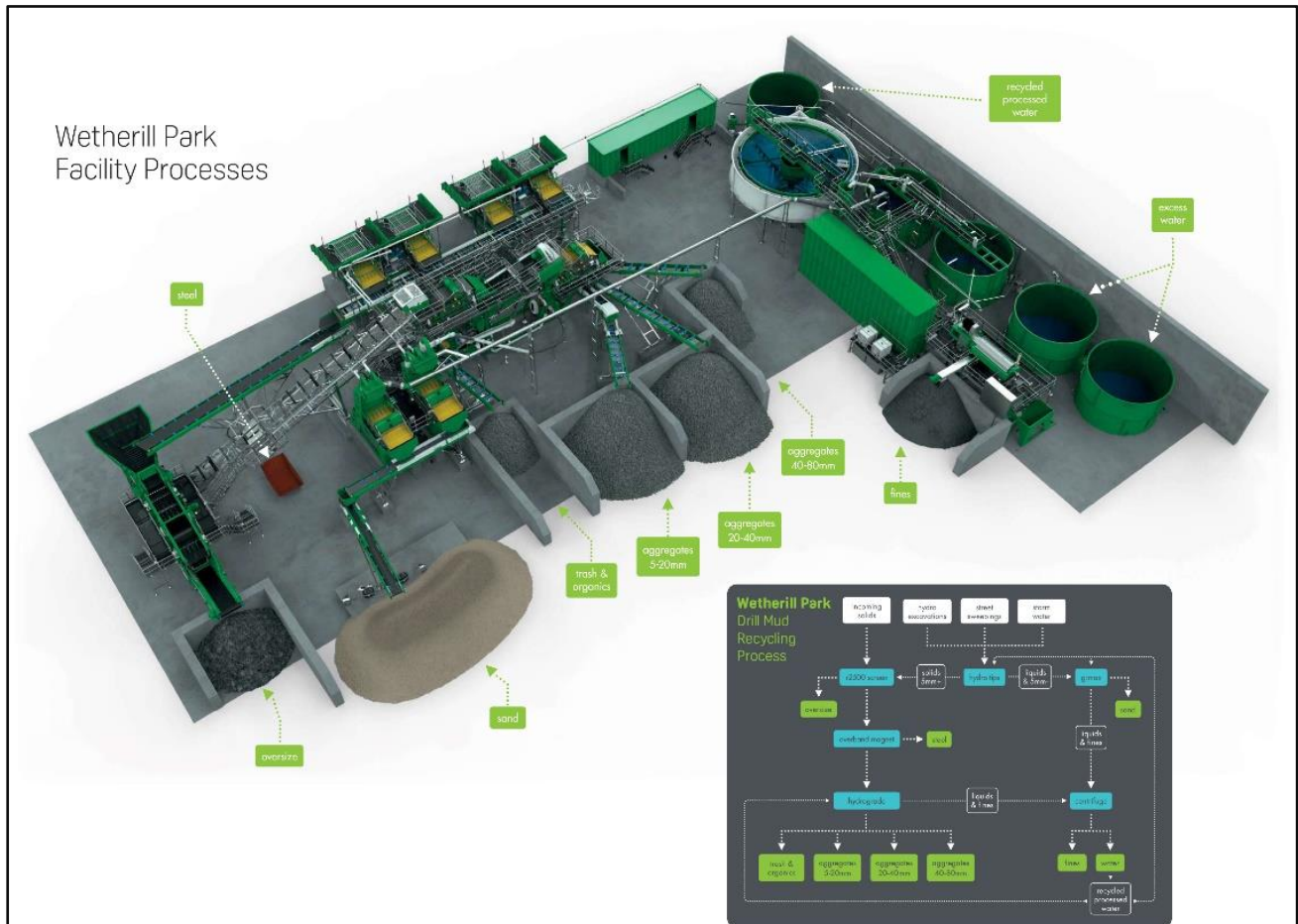


Figure 3: Overview of drill muds processing

The major difference with the Redirect Wash Plant from other recycling facilities is that we aren't just screening material and separating it by size, we are washing/scrubbing it first.

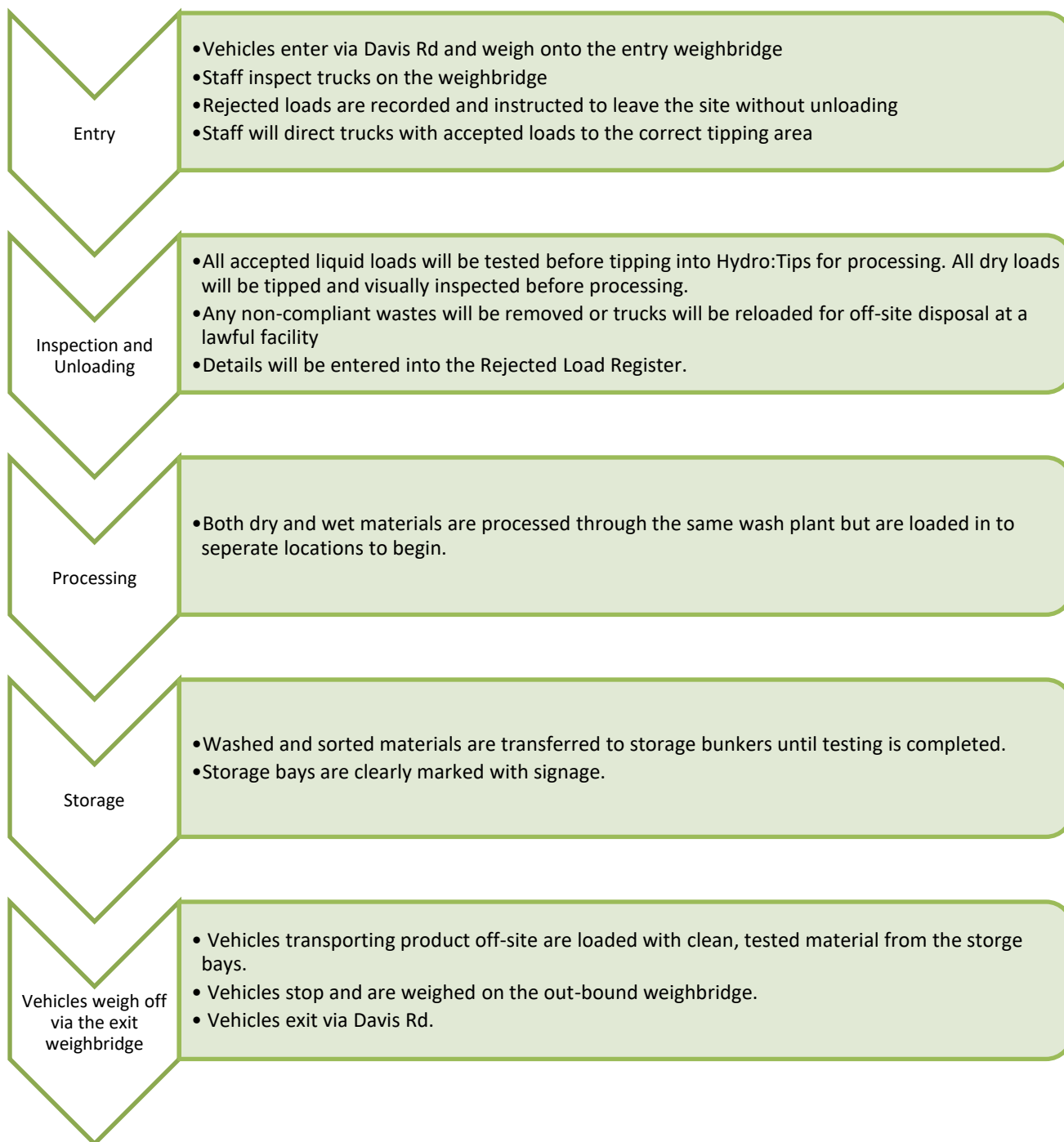
4. Storage

Clean processed materials will be stockpiled in bays until required testing is complete. Finished products from the system include aggregates of varying sizes, dewatered fine cakes, residual waste, organic material, ferrous metals and wastewater. Once data has been received confirming it meets reuse requirements it will be either made available for resale or transferred to another facility for further processing as needed.

5. Loading and transfer of material off-site

There will be various end use markets for products processed by Redirect such as the construction industry, land rehabilitation and garden markets. Material will be made to wholesale customers only, not the general public. All loads that leave site are to be tracked to the customer and details such as weight, product and location recorded. Testing data and conformance letters to be provided. All vehicles will exit on to Davis Road.

Figure 4. Process flow chart for the operation of the Waste Management and Recycling Facility.



2.7.3 Operating hours

Table 8 provides the approved operational hours.

Table 8 Operational Hours as approved under SSD-7401-Mod-2.

OPERATION	RECEIVAL	DISPATCH	PROCESSING
Hydro-Excavation, Drill Muds and Fluids Processing Facility	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours
FGO Facility (Stage 2 operation)	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours
FLD Facility (Stage 2 operation)	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours
Landscaping Material Supplies Facility (Stage 2 operation)	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours	Not Applicable

Despite the Facility largely being permitted to operate 24 hours a day, seven (7) days a week, Condition B58 allows for the works listed below to occur outside the hours specified in **Table 8**:

- 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.

2.7.4 Waste materials to be received

The waste materials to be accepted and recycled at the site are given below. The waste classification of each material under the NSW EPA's *Waste Classification Guidelines* (2014) is also given (**Table 9**). Estimated annual quantities of received materials are detailed in the Facility Waste Management Plan (see **Attachment 4**).

Table 9. Wastes and Raw Materials received at the Facility

RECEIVED WASTES AND RAW MATERIALS	WASTE CLASSIFICATION
Soils (ENM and VENM)	General Solid Waste (non-putrescible)
Clay/Sands/Stone/Gravels/Aggregates (VENM)	General Solid Waste (non-putrescible)
Drilling mud and/or muddy waters from hydro excavation, drilling and pot holing operations	Liquid Waste
Sawdust	General Solid Waste (non-putrescible)
Spent filter sand media	General Solid Waste (non-putrescible)
Street Sweepings	General Solid Waste (non-putrescible)
Stormwater Waste	Liquid Waste
Wood Waste	General Solid Waste (non-putrescible)
Asphalt Waste (including asphalt resulting from road construction)	General Solid Waste (non-putrescible)

RECEIVED WASTES AND RAW MATERIALS	WASTE CLASSIFICATION
Building and demolition waste	General Solid Waste (non-putrescible)
Rail Ballast	General Solid Waste (non-putrescible)

2.7.5 Products transported from the facility

A summary of products for off-site transfer is provided in **Table 10** below.

Table 10 Specification of waste materials approved to be exported from the Facility

RECEIVED WASTES AND RAW MATERIALS	PROCESSING OR END USE	FINISHED PRODUCTS
Soils (ENM and VENM)	Sold as raw product	Finished Products include Mine Mix, Naturaliser, BioNRich, Earth4Turf
Clay/Sands/Stone/Gravels/Aggregates (VENM)	Sale to end user	Clay/Sands/Stone/Gravels/Aggregates
Drilling mud and/or muddy waters from hydro excavation, drilling and pot holing operations	Screening and Processing through CD Enviro System	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
Sawdust	Sale to end user	Sawdust
Spent filter sand media	Sold as raw product	Component of Mine Mix, Naturaliser, BioNRich, Earth4Turf
Street Sweepings	Screening and Processing through CD Enviro System	Washed aggregate, organics transferred to EPA licenced composting site
Stormwater Waste	Screening and Processing through CD Enviro System	Washed aggregate, organics transferred to EPA licenced composting site
Wood Waste	Decontamination & shredding	Screened and re-used in particle board manufacture, unsuitable wood sent to an EPA licenced facility
Asphalt Waste (including asphalt resulting from road construction)	Screening and Processing through CD Enviro System	Washed aggregate for re use in recycled products
Building and demolition waste	Screening and Processing through CD Enviro System	Washed aggregate for re use in recycled products
Rail Ballast	Screening and Processing through CD Enviro System	Washed aggregate for re use in recycled products

2.7.6 Processing Capacity

In accordance with the SSD-7401 Consolidated COA, the Facility will have a total processing capacity of 350,000 tonnes per annum (tpa), consisting of:

- 100,000 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; and
- 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.

In addition to the above, the Facility will store and sell up to 40,000 tpa of bulk landscape materials once all Stages are operational. No processing of bulk landscape materials will occur.

Stage 1 of operation will only include the processing of 100,000 tpa of hydro-excavation, drill muds and fluids, with approved amounts of General Solid Waste (non-putrescible) (see **Table 10**) processed onsite within the dry portion of the Stage 1 drill muds facility (see **Section 2.7**). The quantum of General Solid Waste (non-putrescible) processed onsite will be limited to that that can poured directly into the facility tip pit to avoid any storage or processing outside of the Stage 1 footprint (i.e. bulk landscaping facility will not be operational).

Facility operations shall aim to achieve a recycling rate of 97.5% of all waste and a disposal rate of not more than 2.5% to landfill.

2.7.7 Waste storage during operational phase

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

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

Facility operations shall aim to achieve a recycling rate of 97.5% of all waste and a disposal rate of not more than 2.5% to landfill.

2.7.8 Trade Waste Agreement

The drill mud processing facility is designed to optimise water recovery from the drill muds and significantly reduce the water content in the outgoing recycled products. However, as outlined under Condition B30 of the SSD-7401 Consolidated COA, there is an expectation that wastewater will need to be discharged to sewer under a TWA. The sewer connection will be a 225 mm diameter gravity main located on the northern side of Davis Road which will connect to the 300 mm diameter trunk sewer main.

All extracted wastewater from the drill mud processing facility will be piped to three tanks for re-use and eventual discharge to sewer subject to conditions presented in a Sydney Water TWA. Tanks will be bunded in accordance with the *Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin* (EPA,1997). At the time of writing this OEMP, a TWA is still in negotiation with Sydney Water. Once approved, the TWA will be attached to this OEMP at **Attachment 5** to aid in ongoing site management.

Prior to release, the wastewater will undergo treatment through flocculation and centrifuge to remove suspended solids and the mud fractions, and, therefore, removing contaminants potentially bound in the soils.

Final acceptance standards will be determined for the TWA in collaboration with Sydney Water. Wastewater will be sampled and analysed prior to a metered release to ensure compliance with the TWA.

Northrop (2015) estimated that water extracted from the drill mud processing plant coupled with rainfall collected within the bunded area and potable water inputs for the polymer mixing will result, on average, with 103.4 kL/day requiring release to sewer under the TWA. This rate is assuming 164 tonnes of drill muds and fluids are received daily at the site.

Testing and Holding

Process waters and subsequently wastewaters will be held in a process water tank and two clean water storage tanks following treatment in the centrifuge (refer to Appendix A of SGWMP). Waters held in these tanks will be reused in the drill muds processing until there is an oversupply in water. At this point waters will be tested and when capacity is at 80%.

Discharge / Transport Offsite

If the water in the clean water storage tanks (see Appendix A of SWMP) meets the TWA conditions, then it will be discharged to sewer. If the water is not suitable for discharge, the water will be trucked from site to an appropriately licensed waste facility.

Discharge flow will be measured using an *ABB Wastemaster FEV-DN65* flowmeter (may be updated following issue of TWA).

Discharge of excess wastewater will only occur in designated timeframes under the Sydney Water TWA. These may be updated following issue of the TWA but are expected to be:

- **Monday to Friday** – 08:00 to 20:00.
- **Saturday** – 09:00 to 15:00.
- **Sunday** – 10:00 to 15:00.

2.8 Infrastructure

Key infrastructure at the Facility are summarised in **Table 11**.

Table 11 Key Infrastructure at the Facility (Stage 1).

INFRASTRUCTURE	DESCRIPTION
Office and amenities	An office, meeting room and bathroom amenities are located in the main administration at the entrance to the Subject Site (east of main driveway).
Access	<p>All vehicles enter via 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.</p> <p>In addition, a combined ingress / egress driveway, providing a 5.5 m width has been installed adjacent to the eastern property boundary. This access / egress location will be restricted to use by staff accessing the office complex only, the remain clear for access by Fire NSW in the event of an emergency.</p>
Weighbridge	<p>Originally, one weighbridge has been constructed to facilitate Stage 1 of operations. Additional weighbridges will be constructed as site capacity increases. This OEMP will be updated accordingly.</p> <p>There are no weighbridges located immediately inside the entry/exit access point. This allows for multiple trucks to enter the site at any one time and not queue onto Davis Road.</p>
Car parking	Initially, 12 parking spaces will be provided for Stage 1 operations.
Processing Plant and Equipment (Lower / Mid-Levels)	<p>Partially enclosed shed over drill mud processing plant and equipment, including truck unloading area. Shed area, 7,970m² for the complete shed covering the drill muds processing and bulk landscaping facility.</p> <p>Drill mud processing plant and equipment with 4 x hydro-tips and 1 x tip-pit.</p> <p>Bulk landscape material storage bays inside shed.</p> <p>Demolition of remaining site buildings.</p>
Stormwater System / Rainwater Harvesting System	<ul style="list-style-type: none"> 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 73m² of gravel road drains directly to the SPEL Ecoceptor 6000 prior to draining into receiving environments. 317m² of hardstand fronting Davis Rd and 1676m² of landscaping will drain into existing roadside drainage structures prior to flowing into the receiving environment.

3 Environmental Management Framework

3.1 Roles and Responsibilities

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

Table 12 Roles and Responsibilities

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

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

3.2 Communication Protocols

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

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

Table 13 Key Contacts

NAME	POSITION	CONTACT NUMBER
Neale Hogarth	Operations Manager	0403 996 518
Michael Stewart	Site Manager	0432 165 376
James Sutton	Environmental Manager	0414 987 168

3.3 Conditions of Approval

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

- SSD-7401 Consolidated COA (includes SSD-7401, SSD-7401-MOD-1, SSD-7401-MOD-2 and SSD-7401-MOD-3).
- The facility Environment Protection Licence (EPL 21092 – to be updated).
- SSD-7401 EIS, including appendices and the EIS Statement of Commitments.
- SSD-7401-MOD-1 SEE, including appendices.
- SSD-7401-MOD-2 application letter, titled Proposed modification to SSD-7401 – 24 Davis Road, Wetherill Park, NSW and dated 25 August 2021 (including appendices).
- SSD-7401-MOD-2 Response to Submissions (RTS), dated 29 October 2021 (including appendices).
- SSD-7401-MOD-2 Space Urban response to DPIE request for further information letter, titled *Response to Department of Planning, Industry and Environment Request for Information, dated 19 November 2021 – SSD-7401-MOD-2* and dated 22 November 2021 (including attachments).
- SSD-7401-MOD-3 Environment Assessment, dated 20 December 2021 (including appendices).
- SSD-7401-MOD-3 RTS, dated 21 February 2022 (including appendices).
- Any statutory guidelines referenced within the above documents.

3.4 Legal Requirements

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

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

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

- Lawlex Legislation Service.
- Publications relevant to the waste industry.
- Environment Manager Magazine.
- NSW EPA news bulletins.
- Department of Planning and Environment publications.
- Direct notification by Commonwealth and State Government Departments.

Management shall maintain summaries of legal requirements related to the Operations and environmental aspects.

Table 14 Legal Requirements.

LEGISLATION	ASSOCIATED REGULATIONS	GENERAL INTENT	RELEVANCE TO THE FACILITY
Protection of the Environment Operations Act 1997	<p><i>Protection of the Environment Operations (General) Regulation 2021</i></p> <p><i>Protection of the Environment Operations (Clean Air) Regulation 2021</i></p> <p><i>Protection of the Environment Operations (Noise Control) Regulation 2017</i></p> <p><i>Protection of the Environment Operations (Waste) Regulation 2014</i></p>	<p>One of the aims of the Protection of Environment Operations Act 1997 (POEO Act) is to reduce risks to human health and prevent the degradation of the environment by the use of mechanisms that promote the following:</p> <ul style="list-style-type: none"> • Pollution prevention and cleaner production, • The reduction to harmless levels of the discharge of substances likely to cause harm to the environment, • The elimination of harmful wastes, • The reduction in the use of materials and the re-use, recovery or recycling of materials, • The making of progressive environmental improvements, including the reduction of pollution at source, and • The monitoring and reporting of environmental quality on a regular basis. 	<p>Outlines requirements for a range of activities related to waste facilities including licensing, monitoring and reporting and Resource Recovery Orders and Exemptions</p>
Waste Avoidance and Resource Recovery Act 2001		<p>Minimise the consumption of natural resources and the final disposal of waste and achieve integrated waste and resource management planning.</p>	<p>The operation of the Facility must uphold principles of ecologically sustainable development and focus on waste minimisation and resource recovery over disposal.</p>

LEGISLATION	ASSOCIATED REGULATIONS	GENERAL INTENT	RELEVANCE TO THE FACILITY
Environmental Planning and Assessment Act 1979	<i>Environmental Planning and Assessment Regulation 2021</i>	Encourage the proper management, development and conservation of natural and artificial resources and protection of the environment.	The Project has been approved under Part 4 of the EP&A Act. ReDirect Recycling must comply with all aspects of the Project Approval. Any works that are not consistent with the Project Approval will require additional assessment and approval.
Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)		<i>The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)</i> sets out the requirements for the approval of the Commonwealth Minister for Sustainability, Environment, Water, Population and Communities for actions that may have a significant impact on matters of National Environmental Significance (NES).	The Project will not result in a significant impact on any matters of NES and, as such, does not require a referral to the Minister for the Environment and Heritage.
Contaminated Land Management Act 1997	<i>Contaminated Land Management Regulation 2013</i>	The <i>Contaminated Land Management Act 1977 (CLM Act)</i> is administered by the NSW Environment Protection Authority (EPA) and local councils. It provides a regime for investigating and, where appropriate, remediating land affected by contamination which represents a significant risk of harm to human health or the environment. The CLM Act specifies responsibilities for managing contaminated land and the role of the EPA in the assessment of contamination and the supervision of the investigation, remediation and management of contaminated sites.	The site has been subject of contamination from previous industrial use, however site remediation works have been undertaken and an EPA contaminated site audit has also been undertaken. No known contaminated areas remain on the site. An unexpected finds protocol (UFP) accompanies the project CEMP to manage unexpected finds during construction of the facility.
Fairfield Local Environmental Plan 2013		Provides the local planning and legislative framework for the development. Outlines the approval process and identify the applicable local planning controls that relate to the proposed development.	Determines the development approval process.
Work Health and Safety Act 2011	<i>Work Health and Safety Regulation 2017</i>	To secure and promote the health, safety and welfare of people at work.	The operations must provide a safe work environment.
Environmentally Hazardous Chemicals Act 1985	<i>Environmentally Hazardous Chemicals Regulation 2017</i>	Control of activities related to chemical waste.	Influences waste permissibility.
Public Health Act 2010	<i>Public Health Regulation 2012</i>	To increase the standard of health in NSW.	Outlines requirements for safe drinking water.
Water Management Act 2000	-	To protect, enhance and restore water, associated ecosystems and water quality.	Effects of the facility and waste operations must be managed.

3.5 Licences, permits, and approvals

All necessary licences, permits and approvals required for the proposed activity will be obtained and maintained as required throughout the life of the Project. An EPL has been obtained for the development (EPL 21092), which currently covers construction of the Facility and is attached as **Attachment 13**. reDirect Recycling are currently in the process of updating this EPL to address operation of the Facility. Operation of the Facility will be undertaken in accordance with relevant statutory and other obligations including legislation and regulations, policies, approvals, licences and agreements. Any changes arising during operation of the Facility will be identified (see **Section 7**) and this OEMP will be updated accordingly (see **Section 11**).

3.6 Inductions and Training

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

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

3.6.1 General Site Induction

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

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

3.6.2 Works Specific Induction

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

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

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

3.6.3 General Environmental Awareness

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

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

- OEMP non-conformance reporting requirements.

3.6.4 Tool-box Talks

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

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

3.6.5 Training records

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

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

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


3.6.6 Training Review

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


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

3.7 Work Health, Safety and Environmental Policy

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



Work Health, Safety and Environment Policy



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


The Company:

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


Our core aims and objectives are:

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

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



John Borg
 Company Director
 February 2020



Michael Borg
 Company Director
 February 2020

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

4 Environmental Considerations

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

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

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

4.1 Traffic and access

The 2017 Traffic Impact Assessment prepared by Thompson Stanbury as part of the Facility EIS found that:

- The low traffic demands within Davis Road provide regular and extended gaps within directional traffic flows thereby providing good conditions with which to undertake turning movements to and from the site access driveways. Impedance associated with such movements are therefore projected to be minimum thereby resulting in efficient site access conditions
- The proposed layout out of the site has been designed so as to provide the maximum possible sight distance between the access driveway and the adjoining public road traffic movements. In consideration of this and the above discussion, the projected additional traffic movements generated by the proposed use are envisaged to be provided safe and efficient conditions within which to access and exit the site.

The above statements from the 2017 Traffic Impact Assessment prepared by Thompson Stanbury remain relevant under this OEMP.

In addition, the swept analysis undertaken under SSD-7401-MOD-1 by Pavey Consulting Services indicated that heavy vehicles (12.5 m single unit truck, 19 m semi-trailer, 19 m truck and dog) can:

- Enter and exit the site without any encroachment on the opposing Davis Road west bound travel lane, formalised road verge.
- Be accommodated in the proposed 12.5 m vehicle crossing provide a suitable splay on the exit side is provided in accordance with Council design guidelines.
- Manoeuvre within the site in a safe and efficient manner without any unreasonable encroachment on internal passenger vehicle parking areas or structures.

Further analysis of SSD-7401-MOD-3, undertaken by Pavey Consulting Services in 2021-2022, determined that the updated design remains suitable for safe and efficient operation of Facility, concluding the following:

- The revised on-site parking provisions are adequate to accommodate for projected demand given the likely number of employees and visitors on-site at any one time provided by the applicant.
- The proposed site access arrangements provide for the safe and efficient conditions with which to access and vacate the site.
- The internal circulation arrangements are projected to provide for safe and efficient internal movements and can accommodate the peak operation demands of the use, wholly within the site.

Facility construction will include the installation of two driveways, 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.

- A combined ingress / egress driveway, providing a 5.5 m width adjacent to the eastern property boundary facilitating service access to the office complex and emergency access for Fire NSW.

The suitability of the proposed access driveway with respect to accommodating passenger vehicles is assessed based on guidelines provided within the *Australian Standard for Off-Street Car Parking* (AS2890.1-2004). Both of the proposed combined ingress/egress driveway suitably accords with the design criteria specified within AS2890.1-2004.

In accordance with Condition B55 of the SSD-7401 COA, this OEMP includes an Operational Traffic Management Plan (OTMP), including a Driver Code of Conduct and a Traffic Control Plan (TCP) (see **Attachment 9**). These documents will be reviewed annually and following changes to site operations and activities. Traffic management documentation will assist reDirect Recycling in managing any potential adverse effects of excess heavy traffic to the site and the local community.

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

4.2 Air quality

The project site exists within an industrial precinct that is dominated by heavy industrial activities. The nature of these activities surrounding the site have the potential to also generate dust emissions. Four waste facilities are in proximity to the site, including:

- Veolia / SUEZ Eastern Creek.
- Erskine Park Landfill (Cleanaway).
- Cleanaway Kemps Creek Resource Recovery Park.
- Cleanaway Wetherill Park Waste Motor Oil Recycling.

The Facility proposes to process up to 150,000 tpa of General Solid Waste (GSW) within a partially enclosed building. The nature and extent of the handling and processing of these materials within the sheds, combined with their high moisture content, suggests that the risk of significant dust generation associated with this waste stream is minimal.

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

Although not included in Stage 1 of operation, the dust emission sources associated with material handling and storage of bulk landscaping supplies at the modified development will have the largest potential to generate dust. However, when compared to the currently approved facility, dust emissions associated with the bulk landscaping materials will be significantly reduced due to their containment within a partially enclosed shed. Specifically, potential dust emission sources associated with the handling and storage of bulk landscaping material may include:

- Truck dumping of bulk landscaping material
- Movement of material by front end loader to storage bays
- The unloading of storage bays by front end loader
- The loading of trucks by front end loader
- Wind erosion of stockpiles within the partially enclosed shed.

Australia's annual total emissions for the year to December 2019 were estimated to be 532.4 megatonnes (Mt) of CO_{2-e} (DEE, 2020). A comparison of the project emissions with those of the waste sector, undertaken under a Greenhouse Gas Assessment by Advanced Environmental Dynamics (AED) suggests that the project will contribute an additional 0.022% to this sector and an additional 0.0005% to the annual national total (excluding land use, land use change and forestry).

An operational Air Quality and Odour Management Plan (AQOMP) for the operation of the Facility has been prepared by AED in accordance with Condition B24 of the SSD-7401 Consolidated COA (see **Attachment 2**). This AQOMP will be enacted for the duration of operation of the Facility.

4.3 Noise and Vibration

The SSD-7401-MOD-1 Noise and Vibration Impact Assessment (NVIA) (Global Acoustics Pty Ltd, 2020) indicated that noise and vibration generated by the modified proposal would have little to no impact on the nearest residential receivers to the site. These are located more than 1,500 metres away, and there are a substantial number of industrial premises and buildings along the propagation path. It is considered highly unlikely proposed operations would be discernible at residential locations.

The SSD-7401-MOD-1 NVIA noise model predictions at the site boundary were less than the recommended noise amenity criterion for industrial premises, with the exception of two minor exceedances (2 dB or less) immediately to the west of site. The premises immediately to the west is a metal recycling operation, which currently generates relatively high noise levels.

Premises located east of the subject site all have a solid concrete wall adjoining the common boundary, which form the rear walls of the buildings located along that boundary. Predicted external noise levels at the front of those buildings were typically 20 dB or more below the amenity criterion.

SSD-7401-MOD-2 and SSD-7401-MOD-3 did not include any modification to site processing methodology, processing machinery, traffic generation or modification of the drill muds Facility structure. As such, no additional impacts to the acoustic amenity of the subject site surrounds are expected when comparing SSD-7401-MOD-2 and SSD-7401-MOD-3 to SSD-7401-MOD-1.

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

4.4 Odour

Condition B24 of the SSD-7401 Consolidated COA requires the preparation of an AQOMP prior to operation of the Facility. Odour impacts from the Facility relate to the operation of the Food and Garden Organics (FGO) facility and Food and Liquid Depackaging (FLD) facility. The FGO and FLD facilities will not be utilised under Stage 1 of operation, for which this OEMP has been prepared. As such, this OEMP does not require odour impact mitigation under the AQOMP due to the negligible odour generation from activities to be conducted under Stage 1 of operation.

4.5 Visual Amenity

The Visual Impact Assessment (VIA) prepared for SSD-7401-MOD-1 (RPS, 2020) concluded that the “*design principles of the development seek to achieve visual integration of the built form with the existing visual character at both, local and regional scales*” following the application of the following methods to mitigate the potential visual impact of the construction and operation of the facility upon the surrounding environment:

- The built form of the proposed buildings are of a similar scale to the surrounding industrial and commercial buildings
- Building materials selected will reduce colour contrast and blend any new and existing structures, as far as possible, into the surrounding landscape
- The existing buildings are being reused, which will reduce the visual impact during the construction phase
- The existing vegetation buffer along the southern boundary will be retained and supplementary planting incorporated where possible (in accordance with the screen planting principles)
- Retention of existing trees within the site to assist in fragmenting views of the proposed development.

SSD-7401-MOD-2 and SSD-7401-MOD-3 did not include any changes to the drill muds processing Facility design. In addition SSD-7401-MOD-2 and SSD-7401-MOD-3 included triggered revegetation measures that, if required, would result in enhanced shielding of the Facility from Davis Rd.

4.6 Vermin and Pests

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

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

4.7 Stormwater and Flooding

The existing Council owned stormwater network within Davis Road conveys stormwater to the east discharging into an unnamed concrete lined channel running from the south-west to the north-east of the Wetherill Park industrial estate. The concrete channel discharges into Prospect Creek near Widemere Road, approximately 1 km east of the site.

The site lies within the Georges River catchment which covers an approximate area of 960 km². Flowing through south-western Sydney, the Georges River eventually discharges into Botany Bay. The primary tributary of the Georges River in the area is Prospect Creek which begins at Prospect Reservoir and flows for approximately 26 km through the local government areas of Holroyd, Fairfield, Liverpool and Bankstown, before discharging into the Georges River downstream of Chipping Norton Lake. The site is approximately 500 m south of Prospect Creek and 800 metres south of Prospect Reservoir.

A qualitative flood impact assessment has been undertaken to satisfy the flooding requirements of the SEARs. The assessment was based on a review of the Wetherill Park Overland Flood Study. The subject site is marginally affected by the probable maximum flood (PMF) and 1% AEP flood extent. Flood management onsite will be undertaken in accordance

with the Facility Flood Emergency Response Plan (FERP), prepared by Northrop Consulting Engineers Pty Ltd under Condition B40 of the SSD-7401 Consolidated COA (see **Attachment 6**).

In addition, water management onsite will be undertaken as outlined by the Facility Surface and Groundwater Management Plan (SGWMP) (see **Attachment 7**). The SGWMP has been prepared by Senversa Pty Ltd (Senvessa) to address Condition B49 of the SSD-7401 Consolidated COA and will be enacted throughout the duration of operation of the Facility.

A Surface Water Assessment (SWA) has been prepared by Eclipse Consulting Engineers Pty Ltd (Eclipse) (2021) for the Facility. The adopted stormwater management design will be as follows:

- A portion of roof water runoff is to be directed by downpipes to above-ground rainwater harvesting tanks which have been sized to meet the Facility's reuse demand for non-potable water. One rainwater harvesting tank has been proposed to provide a reuse volume of 5000 L. The harvested volume from a portion of the warehouse roof is to be internally reused through amenities connections with tank overflows reporting to the stormwater system. The remainder of the roof water collected is to be directed to the stormwater system.
- Surface water runoff from the hardstand areas and roof areas not connected to the rainwater tanks is to be conveyed by a new stormwater network near the eastern and western boundaries of the Site. The network carries stormwater towards the south in a gravity-driven pipe network. Stormwater is to be discharged to a sandfilter formed from the structure of a weighbridge pit used on the Site by the previous occupants.
- Discharges from the sandfilter are directed to the south-eastern corner of the Facility to a proprietary treatment device. A SPEL Ecoceptor 6000 series is proposed as the proprietary treatment device, which has been designed and sized to effectively meet the requirements of the Site.
- From the proprietary treatment device, the existing outlet connection point of stormwater into Fairfield City Council's stormwater system along Davis Road will be maintained.

To minimise impacts on the downstream watercourse ecology and health, stormwater treatment devices have been incorporated into the design of the development. These include the following:

- **Sandfilter:** The sandfilter provides media-based filtration. The media consists of highly permeable sand which effectively removes suspended solids and nutrients. The basin has been designed to allow for 600 mm of extended detention, at which points overflows are directed to the outlet sump.
- **Humeceptor:** Stormwater is lastly directed to a proprietary Ecoceptor device. The Ecoceptor is an underground fibreglass stormwater treatment solution that traps pollutants, sediments, and light liquids. The Ecoceptor 6000 series can store up to 11500L of pollutants.

The performance of the proposed stormwater management strategy has been assessed against an equivalent design of the proposed development with no stormwater treatment measures. This has been conducted using MUSIC 6, conceptual stormwater modelling software. The proposed treatment train will effectively reduce all residual pollutant loads by the target quantities specified by Fairfield City Council. Further to this, the development is not expected to result in changes to the downstream hydrologic flow regime and as such is not expected to result in additional nutrient enrichment within downstream water bodies.

Water usage onsite will be monitored once operations commence on the subject site to ensure reuse measure are operating as expected. This will also enable the water balance model (**Attachment 3**) to be updated and/or calibrated after 12 months of operation to gain a better understanding of water usage throughout the subject site and where both operational and environmental improvements can be made.

Additional monitoring of stormwater treatment devices and / or impacts will be undertaken as outlined under Section 8.2 of the SWA (see **Attachment 3**), repeated in Section 7 is this OEMP.

4.8 Groundwater

A Groundwater Impact Assessment (GIA) was undertaken in 2016 for the current approved development by Douglas Partners (refer Appendix 14 of 2017 EIS for SSD-7401 prepared by RPS) to determine the existing hydrogeological and groundwater quality conditions of the site and to assess the potential of the proposed development to impact groundwater or Groundwater Dependant Ecosystems (GDE's).

Results of the 2016 GIA indicated that the proposed development poses a low risk of significantly impacting groundwater supply or quality. Results from four newly established monitoring bores at the development site were generally in line with historical monitoring results and confirm previous groundwater quality results undertaken as part of contamination assessments prepared for the site. Underlying groundwater resources are considered to be unsuitable for beneficial use in the area of the site and there are no high priority GDE's within or near the site. The proposed development is not considered to present a potential risk to GDE's, groundwater bores, or natural drainage features.

Groundwater monitoring management will be undertaken as outlined under the SGWMP (see **Attachment 7**).

4.9 Liquid spills

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

4.10 Pollution incident

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

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

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

4.11 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 (SAIL).

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.

4.12 Fire prevention and protection

A Fire Management Procedure is designed to ensure that in the event of a fire starting, all reasonable and practicable measures are taken to minimise or prevent environmental harm, including air, water or land pollution. Control measures outlined in **Section 5** and **Attachment 8** are included as part of an operational fire management procedure:

The risk of fire at the site is considered minimal. The warehouse building complies with the requirements of the National Construction Code 2019, and its fire protection systems are inspected regularly, in accordance with the *Environmental Planning and Assessment Regulation 2021*.

An Emergency Response Plan (Condition B51) has been prepared and attached to this OEMP (see **Attachment 8**).

4.13 Waste Management

Section 2.7.4 provides a summary of waste materials received at the Facility while **Section 2.7.5** provides an outline of materials transported from the facility. See **Attachment 4** for the Facility Waste Management Plan (WMP), prepared in

accordance with Condition B12 of the SSD-7401 Consolidated COA. The WMP will be enacted throughout the duration of operation of the Facility.

4.14 Heritage

An Aboriginal Cultural Heritage (ACHA) Assessment and a Historic Heritage Assessment (HHA), undertaken for SSD-7401 in 2016 by RPS (refer Appendix 17 and 18 respectively of 2017 Environmental Impact Statement prepared by RPS) inform this OEMP.

The assessment of Aboriginal heritage concluded that the development is not anticipated to have any impact on any items of indigenous heritage due to the disturbed nature of the site, the lack of any listed sites on the relevant heritage databases, and the results of the site inspection.

The review of historic heritage concluded that the development is not anticipated to have any impact on any items of historic heritage due to the disturbed nature of the site and the lack of any listed sites on the relevant heritage databases.

4.15 Contamination

A targeted site investigation for contamination was undertaken at the site in 2017 by Douglas Partners as part of the Response to Submission (RTS) for the 2016 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 was 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 is not required for the 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 development.

An Unexpected Finds Protocol (UFP), prepared in accordance with Condition B71 of SSD-7401, was implemented during construction of Stage 1 (as required under Condition C2). Although not relevant for operation of the Facility, this UFP will be implemented for Stage 2 of construction. The intent of the UFP is to ensure that should a potentially contaminating material be encountered it could be appropriately managed. Therefore, it is considered that the existing site investigation for contamination is adequate.

5 Management Plans and Mitigation Measures

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

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

- AQOMP (Air Quality and Odour Management Plan), see **Attachment 2**.
- WMP (Waste Management Plan), see **Attachment 4**.
- FERP (Flood Emergency Response Plan), see **Attachment 6**.
- SGWMP (Surface and Groundwater Management Plan), see **Attachment 7**.
- ERP (Emergency Response Plan), see **Attachment 8**.
- OTMP (Operational Traffic Management Plan), see **Attachment 9**.

reDirect Recycling have prepared a Conceptual Decommissioning Management Plan (DMP) to provide indicative management guidelines for the decommissioning of the Facility in accordance with Schedule 2, Condition B80 of SSD-7401. The conceptual DMP will be reviewed and updated as required twelve (12) months prior to the closure of the Facility (Condition B80g) to clarify the scope of works required for the decommissioning of the Facility and rehabilitation of the subject site (if required). The Conceptual DMP is included in this OEMP in **Attachment 12**.

In addition to the above, reDirect Recycling have prepared a Conditions Compliance Report (CCR) in accordance with Schedule 2, Condition C6 of the SSD-7401 COA, which states the following:

C6. The Applicant must submit a Conditions Compliance Report to the Planning Secretary with any Environmental Management Plans, to track compliance with the conditions of this approval during the construction and operation of the Development. The Conditions Compliance Report must include procedures for rectifying any non-compliance identified.

This CCR shall be implemented alongside Facility management plans throughout the duration of operation of the Facility and is included in this OEMP in **Attachment 10**.

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

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

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

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	All new buildings and structures, and any alterations or additions to existing buildings and structures will be constructed in accordance with the EIS and relevant requirements of the BCA. <i>Note: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the Development.</i>	Operations Management	On-going
	(If required) Prior to the construction of any utility works associated with the Development, reDirect Recycling will obtain relevant approvals from service providers.	Operations Management	On-going
	All plant and equipment used for the Development will be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Site Management	On-going
	Unless agreed otherwise (with the relevant authority) reDirect Recycling will: (a) repair, or pay the full costs associated with repairing any public infrastructure that is damaged by the Development; and (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the Development.	Operations Management	On-going
	Facility lighting shall be installed in such a manner so as to comply with the following: (a) complies with the latest version of AS 4282 (INT) - Control of Obtrusive Effects of Outdoor Lighting; and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	Site Management	On-going
	Sign and fence installation to occur as per approved layout.	Operations Management	On-going
	The site perimeter fence shall be maintained for the life of the development.	Operations Management	On-going
	Site security gates are to be locked when entry / exit to and from the Facility are not being monitored (i.e. during extended periods without extended deliveries).	Site Management	On-going
Traffic and Access	Monitoring of traffic to be done by the Site Manager and weighbridge operator at all times	Site Management	Continuous during opening hours
	All vehicles will enter and leave the site in a forward direction	Site Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	On-site traffic limited to 15 km per hour	Site Management	On-going
	Internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development will be constructed and maintained in accordance with the latest version of AS 2890.1 and AS 2890.2;	Site Management	Prior to commencement
	Signage will be maintained to ensure safe and efficient traffic flow. Waiting bays to be clearly marked.	Site Management	Prior to commencement
	The various operating areas will be clearly marked, and signage erected to direct heavy vehicles to the relevant operating areas	Site Management	Prior to commencement
	Pedestrian paths on-site will be clearly marked using on-ground delineation and / or signage at all times	Site Management	Prior to commencement
	All vehicles will turn off their engines when stationary (no idling), where practicable.	Site Management	On-going
	The Facility will not result in any vehicles parking or queuing on the public road network.	Site Management	On-going
	A spotter will be used for reversing vehicles when available.	Site Management	On-going
	Heavy vehicles and bins associated with Facility operation will not be parked on local roads or footpaths in the vicinity of the site.	Site Management	On-going
	All vehicles will be wholly contained on site before being required to stop, where practical.	Site Management	On-going
	All loading and unloading of heavy vehicles will occur inside the building	Operations Management	On-going
	Heavy vehicles only enter and exit via the western driveway.	Operations Management	On-going
	The eastern driveway will be reserved for service and emergency access only.	Operations Management	On-going
	The turning areas in the car park will be kept clear of any obstacles, including parked cars, at all times.	Operations Management	On-going
	Material delivery and export will be scheduled to minimise the number of vehicles onsite at any one time.	Site Management	On-going
With respect to minimising the number of vehicles onsite at any one time (above), material delivery and export will be scheduled to minimise periods of time with vehicle onsite to reduce risk to pedestrians.	Site Management	On-going	
Where possible heavy vehicle movements will be scheduled to avoid the morning and afternoon peak traffic periods.	Site Management	On-going	

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Site haulage to be as per Traffic Management Plan (see Attachment 9).	Operations Management	On-going
	All heavy vehicles drivers inducted to the Facility shall abide by the Drivers Code of Conduct (see Attachment 9) both when onsite and when on the public road network.	Operations Management	On-going
	The Driver Code of Conduct is to be signed by individual drivers and authorised representative of reDirect Recycling at the time when drivers attend their site induction or shortly thereafter.	Site Management	On-going
	Drivers must ensure that following tipping that the tailgate is locked before leaving the site.	Truck drivers	On-going
	Trucks entering and leaving the premises that are carrying loads will be covered at all times, except during loading and unloading.	Site Management	On-going
	The entry to the site has been designed such that one vehicle can be on the entry weighbridge and one 19m vehicle (or two 8.8m vehicles) can be waiting to enter without queuing outside of the site boundary;	Site Management	Prior to commencement
	Internal roadway markings and traffic signage will be erected to direct and guide site traffic movements.	Site Management	Prior to commencement
	Delineation of two-way traffic flows will occur through the provision of direction arrows on the internal roadway.	Site Management	Prior to commencement
	Delineation on the access driveway will be provided in accordance with RMS' Delineation Guidelines Section 4 – Longitudinal Markings and Section 10 – Pavement Arrows.	Site Management	Prior to commencement
	Traffic control will be provided onsite and will be coordinated by the individual process area supervisors and weighbridge operator, with direct 2-way radio contact with the truck drivers. As such all trucks will be required to have a 2-way radio programmed with a dedicated site channel.	Site Management	On-going
	All process area supervisors will be required to carry portable 2-way radios to allow for constant contact with the weighbridge operator and truck drivers;	Operations Management	On-going
	The Site Manager and the process area supervisors will be responsible for overseeing the general driver behaviour, including any drivers disobeying internal traffic signage and road markings;	Site Management	On-going
	Electronic swipe tags, vehicle scanners and / or a similar electronic devices will be utilised at the weighbridges for incoming and outgoing loads to reduce the amount of time trucks are held at the entry/exit.	Site Management	On-going
	Within the site, hold lines will be established where trucks can temporarily wait to enter the relevant process area or the outgoing weighbridge.	Site Management	Prior to commencement
	Should queuing start to extend towards Davis Rd, the site controller shall hold all departing vehicles at the loading points to enable clearance of the weighbridge for incoming vehicles.	Site Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Management of vehicles within the hold lines will be overseen by the process area supervisors and weighbridge operator.	Site Management	On-going
	Hold lines will be marked with appropriate signage, numbering, and road markings.	Site Management	Prior to commencement
	The weighbridge operator will direct incoming trucks to the respective process area and a hold line when required.	Operations Management	On-going
	Process area supervisors will be responsible for advising drivers when it is safe to manoeuvre and reverse trucks for waste unloading within process buildings;	Operations Management	On-going
	When leaving the site, trucks will coordinate by 2-way radio with the weighbridge operator regarding their ability to exit the site or whether to wait at a hold line for further instruction;	Operations Management	On-going
	A 'Left Turn Only' sign will be erected at the exit weighbridge to instruct all drivers to turn left when re-entering Davis Road;	Site Management	Prior to commencement
	All drivers, as part of a site induction, will be informed of preferred haul routes to be used when hauling to and from the facility; and	Operations Management	On-going
Odour	All stormwater improvement devices will be regularly maintained and serviced to ensure that anaerobic conditions do not occur	Site Management	On-going
	All general waste produced at the facility will be contained in appropriate waste receptacles and will be removed from site on a weekly basis, or more regularly as required	Site Management	On-going
	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going
Air Quality	All vehicles to comply with strict speed limit of 15 km/hr internal and external to the building	Site Management	On-going
	Dust-causing activities will be stopped when visible dust is observed leaving the subject site. Works will not re-commence until additional mitigation measures are applied to achieve compliance or more favourable weather occurs.	Site Management	On-going
	All internal and external trafficable surfaces are to be sealed	Site Management	Prior to commencement
	Regular watering within vegetated landscaping areas will be used to suppress dust emissions when required.	Site Management	On-going
	All trucks entering and leaving the premises carrying loads must be covered at all times, except during loading and unloading.	Truck drivers	On-going
	Limit load sizes to ensure material is not above the level of truck sidewalls	Truck drivers	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Good dust management procedures will be implemented within the building including sweeping and moistening of paved areas, as required.	Site Management	On-going
	Good dust management procedures will be implemented outside of the building, and the general Site including sweeping to remove dust and other debris.	Site Management	On-going
	Driveways and onsite haulage paths will be regularly swept.	Site Management	On-going
	Activities with the potential to cause fugitive dust emissions will be located away from the subject site boundary wherever possible.	Site Management	On-going
	Training of all staff and personnel accessing the site in the need to minimise dust generation will occur as part of site inductions and regular tool-box talks.	Site Management	Inductions prior to commencing employment / contract. Regular / as needed toolbox talks
	Any areas of bare soils will be revegetated as soon as possible following identification.	Site Management / Environmental Management	As needed
	All waste to be contained in appropriate 3-sided storage bays	Site Management	On-going
	Regularly transport residual waste off-site to landfill.	Site Management	On-going
	Review of any complaints received relating to dust and of reports from monitoring conducted as a result will inform whether additional air quality control measures should be implemented.	Site Management	On-going
	Toolbox meetings to discuss any safety and compliance issues, including dust and odour, that have arisen since the previous meeting.	Operations Management	Monthly
	Dust on site will be visually monitored by the Site Manager and process area supervisors. Should weather forecasting indicate adverse weather conditions, activities with the potential to produce dust will be reduced or ceased until conditions become more favourable.	Site Management	On-going
	Recycled water will be utilised across the operations to maintain hard surfaces and areas that have the potential to produce dust	Site Management	On-going
	An on-site weather station will be installed at the facility to monitor local wind speed, wind direction, and temperature to assist with onsite dust management.	Site Management	Prior to commencement
	No materials will be burnt onsite.	Site Management	On-going
	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	<p>In the event that corrective action for a dust source is required, the following will be attempted (listed in order of action):</p> <ul style="list-style-type: none"> (a) Repair the item of plant if deemed to be faulty, to ensure good working order. (b) Locate the activity behind a dust screen or enclosure. (c) Eliminate the dust source by substitution with another plant/method with lower dust emission. (d) Seek advice of an air quality specialist if a solution is not found. 	Site Management / Environmental Manager	When triggered
Greenhouse Gases	Use of building materials for walls, floors, roofs, that provide insulation and aid in reduced energy costs.	Site Management	Prior to commencement
	Integration of energy efficient glazing and shading where possible.	Site Management	Prior to commencement
	Maximisation of natural ventilation and use of inverter air conditioning systems.	Site Management	Prior to commencement
	Use of natural lighting.	Site Management	Prior to commencement
	Potential future use of photovoltaic cells and battery storage to generate power onsite.	Site Management	Potential use
	Use of light sensors to minimise lighting related electricity usage.	Operations Management	On-going
	Use of high efficiency lighting.	Operations Management	On-going
	Use of variable frequency drive motor controls on stationary equipment to minimise electricity consumption.	Operations Management	On-going
	Waste transfer vehicles to leave site with full loads to reduce the number of traffic movements and diesel consumption	Operations Management	On-going
	All vehicles/plant and machinery will be turned off when not in use and regularly serviced to ensure efficient operation.	Site Management	On-going
Truck routes and loading capacity will be designed and optimised to reduce the distance and effort required by the vehicles.	Operations Management	On-going	
Visual Amenity	The built form of Facility buildings are of a similar scale to the surrounding industrial and commercial buildings.	Operations Management	Prior to commencement
	Building materials selected will reduce colour contrast and blend any new and existing structures, as far as possible, into the surrounding landscape.	Operations Management	Prior to commencement
	The existing vegetation buffer along the southern boundary will be retained and supplementary planting will be incorporated where possible.	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Vegetation fronting Davis Rd has been retained wherever possible to assist in fragmenting views of the Facility.	Operations Management	On-going
	Native flora species will be used for landscaping and / or compensatory planting. Species selection will be consistent with Cumberland Plain Woodland CEEC, which will create habitat for fauna and be commensurate with native vegetation in the locality.	Operations Management	On-going
Noise and Vibration	All vehicles will comply with strict speed limit of 15 km/hr internal and external to the building	Site Management	On-going
	Best management practice will be implemented including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Facility.	Operations Management	On-going
	Facility operations will have regards to meteorological conditions that may exacerbate noise impacts to sensitive receivers (e.g. strong source to receiver vectors).	Operations Management	On-going
	Noise suppression equipment on plant will be maintained effectively at all times.	Site Management	On-going
	All doors and openings are to be completely closed during noisy activities wherever possible.	Site Management	On-going
	Operators will be instructed to throttle down or switch off idle plant and equipment.	Site Management	On-going
	Defective plant will not be used operationally until fully repaired.	Site Management	On-going
	Regularly assess noise emissions and relocate, modify, and/or stop operations if adverse noise impacts are expected to occur beyond the site boundary.	Operations Management	On-going
	All site vehicles owned by ReDirect Recycling will be fitted with broadband reversing alarms only.	Site Management	On-going
	Mobile plant operation will only occur inside the building and mobile plant will be fitted with broadband noise reversing alarms.	Site Management	On-going
	Noise emissions from the Facility will be in compliance with the requirements of the NSW EPA's <i>Noise Policy for Industry</i>	Operations Management	On-going
	Vibration generating equipment will be isolated on resilient mounts from any connective structures	Operations Management	On-going
	Inertia blocks will be utilised to add system mass to reduce vibration where required;	Operations Management	On-going
Balance weights to be utilised to correct rotation of poorly balanced parts where required.	Operations Management	On-going	

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Vibration generating plant to be located, where practical, as far from neighbouring industrial buildings as possible.	Operations Management	On-going
	Mountings for all high vibration generating equipment will be installed such that there are no rigid connections between the equipment and the supporting structure.	Operations Management	On-going
Surface Water / Stormwater	Any activity with the potential to generate leachate will be suitably bunded, with leachate captured and disposed of at a suitably licenced facility. No leachate is to enter the stormwater system.	Site Management	On-going
	Stormwater systems will be inspected and maintained as outlined under Section 7.4	Operations Management / Maintenance Contractor	Quarterly
	Ongoing surface water monitoring will be undertaken as outlined under Section 7.7	Environmental Management	On-going
	Stormwater runoff from some roof tops will be captured and diverted to a 5 kL rainwater tank for re-use on site.	Site Management	On-going
	All drill mud processing is taking place inside of the shed preventing surface waters from coming into contact with muds.	Site Management	On-going
	Stormwater runoff from the hardstand areas, rooftops and parking areas will flow into stormwater drains, through the sand filter bed and into an Ecoceptor prior to being discharged.	Operations Management	On-going
	No waste soils or products will be stored in areas where rainwater can come into contact and generate leachate.	Site Management	On-going
	Process waters will continue to be re-used in drill muds processing until there is an excess in the system at which point the process water will be released to sewer under the TWA (see Section 2.7.8) or trucked off site if it does not meet TWA requirements.	Operations Management	On-going
	An alarm system which sounds and flashes once the amount of wastewater within the wastewater tanks reaches 80% of the total capacity will be installed prior to operation.	Operations Management	Prior to commencement
	All waste soil and product stockpiles will be stored inside the main shed to prevent exposure to meteorological conditions and potential generation of leachate.	Site Management	On-going
	If any waste product is intended to be stored in an area where rainwater can infiltrate the stockpiles and generate leachate in the future, then a leachate management plan will be prepared subordinate to the SGWMP.	Operations Management	On-going
Stormwater will only be stored on site within the sand filter bed, which has been designed to allow for 600 mm of extended detention, at which point overflows are directed to the outlet sump and the Ecoceptor. The only other surface water to be retained on site will be the rainwater harvested from the drill mud processing shed roof, which will be stored in a 5 kL rainwater tank.	Operations Management	On-going	

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Sediment and erosion controls will be implemented to mitigate migration of sediments and fines into drains and minimise potential impact on the surrounding off-site environment. General controls include those in Landcom (2004) <i>Managing Urban Stormwater: Soils and construction</i> - Volume 1, 4th edition.	Site Management	On-going
	All trafficable areas will be sealed to minimise erosion and tracking of dirt off-site.	Site Management	Prior to commencement
	Minimise dust and materials within the car park area, driveway, ramp and on Davis Road and minimising tracking from the loader via mechanical cleaning of truck wheels and tailgates prior to leaving site where practicable.	Site Management	On-going
	Clean stormwater drains and pits in the carpark area periodically.	Site Management	On-going
	Suitable sediment and erosion controls will be implemented during excavation works via temporary sediment fencing or similar.	Site Management	During any works that include ground disturbance capable of causing erosion.
	Minimise tracking of soils from the receiving areas and processing sheds via mechanical cleaning of wheels and tailgates of trucks prior to leaving site.	Site Management	On-going
	Cleaning of tracked materials in the car park area, ramp, driveway and on Davis Road using street sweeper (or similar) on a regular basis and prior to rainfall events if practicable.	Site Management	On-going
	Delivery and unloading of bulk materials will be avoided during rainfall and / or strong vectors where practicable.	Site Management	On-going
	Maintenance of site vehicles and / or machinery will occur offsite where possible.	Site Management	On-going
	If undertaken onsite, the maintenance of site vehicles and / or machinery will be undertaken upon a sealed surface with appropriate controls (e.g. bunding, weather cover) in place.	Site Management	On-going
	All plant onsite will be fitted with spill kits, with additional spill kits to be maintained onsite within the drill muds facility and site office.	Operations Management	On-going
	Wastewater from the hydro-excavation, drill mud and fluids processing facility will not enter the stormwater management system.	Operations Management	On-going
	All spills will be cleaned up as soon as possible, to be managed as per the Facility Pollution Incident Response Management Plan.	Site Management	On-going
	Site structures to be regularly checked for erosion and scouring.	Operations Management / Maintenance Contractor	Monthly or after rain event

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Treatment areas and structures will be regularly checked for the build-up of litter material.	Operations Management / Maintenance Contractor	Monthly or after rain event
	Inflow areas and pit grates will be inspected and maintained to be clear of litter and debris.	Operations Management / Maintenance Contractor	Monthly or after rain event
	The sediment chamber of the Ecoceptor will be regularly checked and cleaned and any damaged covers replaced.	Operations Management / Maintenance Contractor	Monthly or after rain event
	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.	Operations Management / Maintenance Contractor	Monthly or after rain event
	Ensure downpipe leaf eaters, first flush devices and litter screens are unblocked and are operating correctly.	Operations Management / Maintenance Contractor	Monthly or after rain event
	Spill kits will be utilised at all process areas.	Operations Management	On-going
	Staff will be appropriately trained on spill containment and management.	Operations Management	On-going
	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going
	Inspect and remove any build-up of sediment, debris, litter, and vegetation within drainage system.	Operations Management / Maintenance Contractor	Monthly or after rain event
	Prior to operation, the bulk landscape storage and load-out area will be fully sealed with a two-coat tar seal to reduce the generation of sediment material.	Site Management	Prior to commencement

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Remove grate and inspect internal walls and base, repair where required. Remove any collected sediment, debris, litter, and vegetation. (e.g. Vacuum truck) Inspect and ensure grate is clear of sediment, debris, litter, and vegetation. Ensure flush placement of grate on refitment.	Operations Management / Maintenance Contractor	Quarterly/ after major storm
	Inspect all drainage structures as per Section 7.4.1 and the SGWMP (Attachment 7), noting any dilapidation, carry out required repairs.	Operations Management / Maintenance Contractor	Bi-annually
	Maintenance of stormwater structures will refer to manufacturer's operation and maintenance manual.	Operations Management / Maintenance Contractor	As per manufacturer's manual
Stormwater – Rainwater Tanks	Inspect first flush device to ensure correct operation. Remove accumulated litter & debris. If device is not functioning properly repair or replace.	Operations Management / Maintenance Contractor	Bi-annually
	Stormwater systems will be inspected and maintained as outlined under Section 7.4	Operations Management / Maintenance Contractor	Quarterly
	Check for evidence of access by animals, birds or insects including the presence of mosquito larvae. If present, identify access point and close. If evidence of algal growth, find and close points of light entry.	Operations Management / Maintenance Contractor	Bi-annually
	Check structural integrity of tank including roof and access covers. Any dilapidation including holes or gaps will be noted and repaired.	Operations Management / Maintenance Contractor	Bi-annually
Flooding	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.	Operations Management	On-going
	A <i>Floodsafe Emergency Kit</i> will be maintained onsite. The Floodsafe Emergency Kit should include the following items: (a) Copy of Emergency Response Plan for the Facility. (b) Chemical Register. (c) Air horn and hand-held loudspeaker.	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	(d) Portable radios with spare batteries. (e) A torch with spare batteries. (f) A first aid kit. (g) Candles and waterproof matches. (h) Waterproof bag for valuables. (i) Drinking water and non-perishable food items. (j) A copy of emergency contact phone numbers. (k) 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.	Site Management	On-going
	The Flood Emergency Response kit will be inspected on a minimum bi-annual basis. Maintenance of the Flood Emergency Kit will be undertaken as required to ensure all components are present and in operating condition.	Operations Management	Bi-annual
	Flood management and response will occur as outline under the Facility Flood Emergency Response Plan, (see Attachment 6).	All management	On-going
	Yearly (at minimum) evacuation drills will be implemented as part of ongoing training onsite.	Operations Management	Yearly
	All contractors and machine operators will be inducted on the environmental sensitivities of the work site(s) and relevant safeguards.	Operations Management	On-going
	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.	Operations Management	At commencement of operation
	The flood Emergency Assembly Point will be located within the drill muds warehouse as shown in Attachment 6 .	All management	On-going
	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.	Operations Management	Triggered
	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.	Site Management	Triggered
	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	Site Management	Triggered

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	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.	Site Management	Triggered
	For emergency assistance during flood events, please call the SES on 132 500.	Site Management	Triggered
Groundwater	Groundwater monitoring to occur as outlined under Section 7.6	Operations Management	See Section 7.6
	If a potentially contaminating substance is to be stored or used on the site, further groundwater monitoring will be undertaken if necessary, to provide data on the background concentrations (if any) of the substance in the groundwater.	Operations Management	If triggered
	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. 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.	Operations Management	If triggered
	Spill kits will be stationed and utilised at all individual process areas.	Operations Management	On-going
	Staff and contractors will be appropriately trained on spill containment and management.	Operations Management	On-going
	Staff and contractors will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going
Vermin and Pests	Remove and dispose off-site of any waste that has the potential to generate odour and attract pests or vermin.	Site Management	Daily
	Regularly clean waste floors, walls, and all loading areas, including mechanical sweeping of the building floor following periods of high traffic volumes.	Site Management	Daily
	All overhead structures and internal roofs are visually inspected weekly to ensure they are kept clean.	Site Management	Ongoing
	The subject site will be kept in good condition to limit harbourage for pests by ensuring grounds and gardens are kept free from excessive weeds and undergrowth.	Operations Management	On-going
	The drainage sumps and catch drains will be inspected daily and cleaned regularly to prevent providing a potential habitat for pests.	Site Management	Daily

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Litter patrols will be conducted on a routine basis to remove any windblown litter. Incorporated in the litter patrol is an inspection for the emergence of potential vector habitats.	Site Management	Triggered at discretion of Operations Management, Site Management and / or Environmental Management
	Inspection of the site by a registered pest controller will be undertaken.	Operations / Environmental Management	As needed
	If required, implement a spray and bait program as directed by the registered pest controller.	Operations Management	As needed
Biodiversity	All rehabilitation works are to be completed as per approved Landscape Plans (see Attachment 11).	Operations Management / Landscape Contractor	On-going
	Exclude all machinery and human activity from the patch of Cumberland Plain Woodland CEEC.	Operations Management / Landscape Contractor	On-going
	No clearing of retained native vegetation will occur without approval from DPE.	Operations Management / Landscape Contractor	On-going
	Install a barrier suitable for operation in the post construction stage to separate site operations from the biodiversity values present within the patch of Cumberland Plain Woodland CEEC.	Site Management	Prior to commencement
	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 (<i>Themeda triandra</i>).	Operations Management / Landscape Contractor	On-going
	Weed treatment will occur alongside maintenance of landscaping within subject site. This supports compliance with the NSW <i>Biosecurity Act 2015</i> .	Operations Management / Landscape Contractor	Quarterly
	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going
	No impact to retained vegetation parcels is expected during operation, however the following process will be applied to rehabilitate any vegetated areas identified as requiring rehabilitation during operation: <ul style="list-style-type: none"> Any compacted ground will be ripped and blended to aerate surface soils and prevent ponding. 	Operations Management / Environmental Management	As needed

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	<ul style="list-style-type: none"> • 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 (<i>Themeda triandra</i>). • Wherever possible, <i>Eucalyptus moluccana</i> (Grey Box), <i>Eucalyptus tereticornis</i> (Forest Red Gum) and <i>Corymbia maculata</i> (Spotted Gum) will be sourced for tree planting as part of rehabilitation works. • 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: <ul style="list-style-type: none"> ○ 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. 		
Hazardous Substances	<p>All chemicals, fuels and oils used on-site will be stored in accordance with:</p> <ul style="list-style-type: none"> (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's 'Storing and Handling of Liquids: Environmental Protection – Participants Handbook' if the chemicals are liquids. <p>To the more stringent version of the above.</p>	Site Management	On-going
	<p>The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.</p>	Operations Management	On-going
	<p>Dangerous goods, as defined by the Australian Dangerous Goods Code, will be stored and handled strictly in accordance with:</p> <ul style="list-style-type: none"> (a) all relevant Australian Standards; 	Site Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	<p>(b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p> <p>(c) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA,1997).</p> <p>In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement will be adhered to during operation.</p>		
Pollution	All chemicals, fuels and oils used on site will be stored in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007	Operations Management	On-going
	Accidental spillage or poor management of fuels, oils, lubricants, hydraulic fluids, solvents and other chemicals during the operation of the Development will be controlled through spill management actions to prevent water quality and ecological impacts.	Operations Management	On-going
	Spills, leaks or other discharge of any waste(s) or other material(s) will be cleaned up as soon as practicable after it becomes known.	Operations Management	On-going
	Dangerous goods will be stored on site according to their respective ADG classes and compatibility.	Operations Management	On-going
	In the event of an incident, notification and actions in the Pollution Incident Response Management Plan are to be activated	Operations Management	On-going
	Pollution Incident Response Management Plan training is to be provided as part of environmental training and the plan is to be tested at least once a year.	Operations Management	Training – ongoing / as needed Testing – at least once per year
Hazards and Risks	A strict no smoking policy is enforced on site when in proximity of any combustible materials. Smoking will only be permitted in clearly signposted areas	Operations Management	On-going
	Fire extinguishers will be positioned at readily accessible points, including on mobile plant, so that their use in an emergency is not restricted	Operations Management	On-going
	All equipment is to be regularly serviced in line with the manufacturer's recommendation	Operations Management	On-going
	Ensuring that the temperature of all stockpiles and windrows is monitored in accordance with established workplace procedures.	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	In the event that a fire cannot be extinguished using water or soil, the use of fire retardants should be considered (expert advice should be sought from Fire and Rescue NSW before taking action with retardants)	Operations Management	On-going
	Once the fire has been extinguished, affected areas should be monitored on a continual basis until materials have cooled	Operations Management	On-going
	All fire water will be contained on site	Operations Management	On-going
	All staff will be trained in the use of onsite firefighting appliances	Operations Management	On-going
	Ensuring that combustible materials are not accumulated in areas close to exhausts or engines.	Operations Management	On-going
	Stockpiles of waste materials in the designated waste storage area will be limited to 4m in height.	Operations Management	On-going
	Waste contained in hook lift bins will not exceed the rim of the bin	Operations Management	On-going
	Stockpiles of organic material such as timber and mulch will be limited to a maximum of 3m in height in the processing and blending areas.	Operations Management	On-going
	Flammable materials, such as paper, plastic, etc. to be stored in metal skip bins.	Operations Management	On-going
	Automatic fire sprinkler system in place in the event of fire, supported by an isolation valve to contain firewater on site.	Operations Management	On-going
	All mobile plant and equipment will be fitted with fire extinguishers.	Operations Management	On-going
	All mobile plant and equipment will be regularly serviced to ensure they are in a safe and functioning condition	Operations Management	On-going
	An Emergency Response Plan has been prepared and implemented for the facility.	Operations Management	On-going
	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.	Operations Management	On-going
	All staff on site will be appropriately trained in the handling of dangerous goods.	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	Flammable and combustible liquids will be stored in accordance with <i>AS 1940-2004: The Storage and Handling of Flammable and Combustible Liquids</i> .	Operations Management	On-going
Waste	No materials or waste (as defined by the POEO Act) generated outside the Site will be received at the Site for storage, treatment, processing or reprocessing except as expressly permitted by the EPL.	Operations Management	On-going
	The Facility will not receive or process more than 350,000 tonnes per annum (tpa), consisting 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; and (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.	Operations Management	On-going
	The Facility will not store more than 40,000 tonnes per year of landscape material supplies at the site and no processing of landscape supplies will be conducted.	Operations Management	On-going
	The Facility will not store general solid (putrescible) and liquid waste at the site for more than 48 hours from the time of receipt unless in the event of an emergency and approved by the Secretary.	Operations Management	On-going
	No compost will be stored onsite.	Operations Management	On-going
	Stockpiles of product stored at the landscaping material supplies facility will not exceed 4 m in height measured from the finished ground level.	Site Management	On-going
	Facility operations shall aim to achieve a recycling rate of 97.5% of all waste and a disposal rate of not more than 2.5% to landfill.	Operations Management	On-going
	Waste received at the Facility is assessed and classified in accordance with the EPA's <i>Waste Classification Guidelines</i> as in force, from time to time.	Site Management	On-going
	Management will record the amount of waste (in tonnes) received at the Subject Site on a daily basis via weighbridges in place.	Operations Management	Daily
	All waste loads outside the building footprint are to be covered.	Site Management	On-going
	All waste materials removed from the site will only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Operations Management	On-going
	All waste will be: (a) stored wholly within the designated waste storage areas; and	Site Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	(b) loaded and unloaded within the designated loading and unloading areas.		
	Subcontractors will be informed of site waste management procedures.	Operations Management	On-going
	Liquid and non-liquid waste(s) will not be unlawfully deposited on the premises.	Site Management	On-going
	Plant and equipment will be regularly maintained.	Site Management	On-going
	Ordering will be limited to only the required amount of materials.	Operations Management	On-going
	Materials will be segregated to maximise reuse and recycling.	Site Management	On-going
	Routine checks would be undertaken of waste sorting and storage areas for cleanliness, hygiene and OH&S issues, and contaminated waste materials.	Environmental Management	On-going
	Local commercial reuse opportunities will be investigated where reuse on-site is not practical.	Operations Management	On-going
	Separate skips and recycling bins will be provided for effective waste segregation and recycling purposes.	Site Management	On-going
	Training and awareness of the requirements of the WMP and specific waste management strategies will be undertaken.	Operations Management	On-going
	Contaminated waste will be managed, transported, and disposed of in accordance with licensing requirements.	Operations Management	On-going
	Waste removed from site will be transported and disposed of in accordance with licensing requirements.	Operations Management	On-going
	Assessment of suspicious potentially contaminated materials, hazardous materials and liquid wastes will be undertaken.	Operations Management	On-going
	Regular monitoring, inspection and reporting requirements will be undertaken and findings implemented.	Operations Management	On-going
All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going	
Cultural Heritage	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development	Operations Management	On-going

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	All works on site will cease in the event that any Aboriginal cultural object(s) or human remains are uncovered. If human remains are uncovered, work will immediately stop, with no further disturbance to the remains and NSW Police will be notified. Heritage NSW and the Aboriginal community will be contacted if the remains are suspected to be of Aboriginal origin. If other Aboriginal objects are discovered, work will be immediately stopped, with no further disturbance to the objects and notification to Heritage NSW by calling Environment Line on 131 555. Works must not resume in the designated area until the relevant written consent is received from NSW Police and/or Heritage NSW. Any Aboriginal objects discovered must be registered on the Aboriginal Heritage Management Information System (AHIMS), in accordance with section 89A of the <i>National Parks and Wildlife Act 1974</i> .	Operations Management	On-going
Historical Heritage	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development	Operations Management	On-going
	If during the course of development works suspected historic heritage material is uncovered, work will cease in that area immediately. Heritage NSW will be notified immediately and works will only recommence when an approved management strategy has been developed.	Operations Management	On-going
Contamination and Soils	Ongoing groundwater monitoring will be undertaken as outlined under Section 7.6	Environmental Management	On-going
	Ongoing surface water monitoring will be undertaken as outlined under Section 7.7	Environmental Management	On-going
	Should unexpected contamination be encountered, a suitably qualified environmental consultant will be engaged to assess the conditions in accordance with a site Unexpected Finds Protocol and implement remediation activities in accordance with Australian Standard AS 4976 – 2008 <i>The Removal and Disposal of Petroleum Underground Storage Tanks</i> and WorkCover NSW, <i>Code of Practice: Storage and Handling of Dangerous Goods, 2005</i> ;	Operations Management	Triggered
	Any excavated materials that are considered to be potentially contaminated will be placed within containment bins for testing, disposal, treatment, or re-use; and	Operations Management	Triggered
	All contractors and staff will receive an onsite environmental induction at the commencement of their employment at the development.	Operations Management	On-going

6 Environmental Incidents Management Strategy

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

The following procedure is for general environmental incidents that have the potential to cause material harm to the environment. Smaller, minor incidents will be managed in accordance with the Facility's Environmental Emergency Response Plan (see **Attachment 8**), with relevant contacts listed in **Table 16** below.

Table 16 Emergency Contacts

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

6.1 Responsibility

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

All employees and contractors are to:

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

6.2 Incident Management

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

6.2.1 Preventative Action

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

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

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

6.2.2 Notify

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

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

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

- The appropriate regulatory authority (refer to **Table 6**);
- If the NSW EPA is the appropriate regulatory authority - the NSW EPA;
- If the EPA is not the appropriate regulatory authority - the local authority for the area in which the pollution incident occurs (i.e. Fairfield City Council);
- NSW Health;
- SafeWork NSW; and
- Fire and Rescue NSW.

Relevant contact details are listed in **Table 6** for the regulatory authorities that have an interest in the Facility.

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 Planning Secretary no later than 14 days after the incident or potential incident (See **Section 7.2.2**).

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

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

6.2.3 Assistance

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

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

If adequate resources are not available and the incident threatens public health, property or the environment, it is essential that Fire and Rescue Service NSW and/or the EPA be contacted. Relevant contact details are listed in **Table 6** for the regulatory authorities that have an interest in the Facility.

6.2.4 Investigate

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

6.2.5 Remedial Action

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

Remedial action may include:

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

6.2.6 Record

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

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

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

6.2.7 Review

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

6.3 Preventative Actions

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

6.4 Environmental Response Plans

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

- **Sections 5, 6 and 7** of this OEMP.
- Procedure for Traffic Management under the TMP (**Attachment 9**).
- Procedure for Dust and Litter Minimisation under WMP (**Attachment 4**) and AQOMP (**Attachment 2**).
- Procedure for Minimising Noise Pollution in **Sections 5 and 7** of this OEMP.
- Procedure for Non-Conforming Waste under WMP (**Attachment 4**).
- Procedure for Stormwater Pollution Prevention under **Sections 5 and 7** of this OEMP, the SGWMP (**Attachment 7**) and SWA (**Attachment 3**).
- Procedure for flood management under the FERP (**Attachment 6**).
- Procedure for Emergency Preparedness and Response under **Sections 5 and 6** of this OEMP and the ERP (**Attachment 8**).
- Procedure for Fire Prevention under **Section 5** of this OEMP and the ERP (**Attachment 8**).
- Procedure for Weighbridge Management under **Sections 7** of this OEMP and the WMP (**Attachment 4**).
- Pollution Incident Response Management Plan.
- Waste Management Plan (**Attachment 4**).

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

7 Monitoring & Reporting

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

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

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

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

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

7.1 Ongoing Recording Requirements

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

Table 17 Records to be maintained onsite

CONDITION	ITEM	FREQUENCY
-	All documents / records listed in the following subsections of this OEMP	As per the following subsections
A17	All weighbridge records will be maintained as required by the POEO (Waste) Regulation and for the life of the development. The weighbridge records will be made immediately available on request by the Secretary and/or the EPA. Incoming: record all incoming wastes and resources by category, customer, and place of origin. Outgoing: all outgoing loads will be weighed and recorded by category, customer, destination and transporter.	As applicable.
A18	All waste classification records will be maintained for all wastes received on the site and waste disposed from the site for the life of the development. The waste classification records will be made immediately available on request by the EPA and/or the Secretary.	As applicable.
B3	The quantity of waste received onsite (in tonnes) each day will be recorded on a site register, to be provided to regulatory authorities if requested	Daily
B5	All sampling and waste classification data will be maintained for the life of the Facility in accordance with the requirements of the EPA	As applicable.
B15	Facility Management will retain disposal records for all waste disposed of under the Construction and Demolition Waste Management Plan for 4 years and provide these to the EPA as requested	Retain for four (4) years after obtaining.
EPL	The following surface water and groundwater monitoring data will be retained onsite: (a) Sample collection date(s). (b) Sample collection time(s). (c) Sample location. (d) Name of person(s) who collected sample.	Records maintained for four (4) years following relevant sampling event.

7.2 Continuous Monitoring

7.2.1 Monitoring & Actions

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

7.2.2 Reporting

In accordance with Condition 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 9.3.1** of this OEMP.

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

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

7.3 Monthly Monitoring

7.3.1 Monitoring

A monthly site inspection will be undertaken by the Site Manager, Environmental Manager or appropriate delegate throughout the duration of operation of the Facility. The intent of the inspection will be to identify any potential non-compliances (managed as per Section 3.4 of CCR - **Attachment 10**), or potential improvements for site management that would reduce environmental impacts or aid in overall compliance of operations.

7.3.2 Reporting

Personnel undertaking monthly inspections of operations will record results and recommendations on a monitoring card (see **Attachment 14** for example). The monitoring card may be replaced by a digital / tablet monitoring form if deemed to be more sustainable or suitable for ongoing management of the Facility.

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

7.4 Quarterly Monitoring

7.4.1 Stormwater System Maintenance

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

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

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

ITEM TO BE MONITORED	MONITORING TASK	PURPOSE OF MONITORING	MAINTENANCE ACTION
GENERAL			
Environmental Incident or Unexpected Find	<p>Environmental incident in driveway, ramp or car park etc.</p> <p>Visual indications of gross contamination at ground surface, drain or stormwater control device (e.g. a visible sheen, hydrocarbon odour or staining, gross waste).</p>	<p>Check whether additional environmental controls or monitoring are required.</p> <p>Assess notification requirements (e.g. to FCC, EPA).</p>	<p>Implement additional environmental controls (e.g. spill clean-up, erosion controls).</p> <p>Review and conduct additional sampling of stormwater discharge, as required.</p>
Sediment Build Up	<p>Check for excessive build- up of sediment in stormwater system including pits and pipes.</p> <p>If sediment build up is noted, identify source.</p>	<p>If sediment accumulates in stormwater pits and pipes, capacity reduction can occur.</p> <p>Excessive build-up of sediments in Ecoceptor can reduce the effectiveness of the devices over time.</p> <p>Erosion and sedimentation of stored waste material may contribute to increased transport of pollutants.</p>	<p>Once sediment source has been identified and stabilised, remove accumulated sediment by flushing the system and/or emptying the Ecoceptor</p>
Erosion or Scour	<p>Check for erosion and scour around the structures.</p> <p>If scour is noted check for source of scour.</p>	<p>Erosion impairs filtration systems by preventing uniform distribution of flow through the system.</p>	<p>Fill in any holes with appropriate filter media.</p> <p>Provide energy dissipation if required.</p>
Litter (Anthropogenic)	<p>Check for litter in and around treatment areas and structures.</p>	<p>Litter can potentially block inlet and outlet structures resulting in flooding, as well as detract from the system's visual amenity.</p>	<p>Address source of litter with appropriate action.</p> <p>Remove litter</p>
Litter (Organic)	<p>Check for organic litter, including leaves and sticks.</p>	<p>Organic litter can provide an additional source of nutrients to the filtration systems.</p> <p>Accumulated organic matter can also create offensive odours and can reduce percolation of water into the filter media.</p>	<p>Identify and address sources of organic litter with appropriate action.</p> <p>Remove litter.</p>
Inlet and Outlet Pits	<p>Ensure inflow areas and grates over pits are clear of litter and are in good/safe condition.</p>	<p>If pits become blocked it is likely to greatly reduce the amount of stormwater entering the system.</p>	<p>Remove debris and repair any structural damage as required.</p>

ITEM TO BE MONITORED	MONITORING TASK	PURPOSE OF MONITORING	MAINTENANCE ACTION
	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.
	<i>Maintenance is generally to be in accordance with the manufacturer's instructions and procedures.</i>		
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.
Sand Filter	Monitor ponding and its duration compared to design infiltration period.	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.
	Remove deposited sediment and debris from the sand level and inlet/outlet areas.		Replace sand and inspect drainage as appropriate.
	Regularly check the structural integrity of hydraulic structures.		

ITEM TO BE MONITORED	MONITORING TASK	PURPOSE OF MONITORING	MAINTENANCE ACTION
Exceedance of water quality objectives	<p>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.</p> <p>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) <i>Australian and New Zealand Guidelines for Fresh and Marine Water Quality</i> for heavily disturbed environments; and, primary contact recreation (PCR) guidelines adopted from National Health and Medical Research Council (NHMRC) (2011), <i>Australian Drinking Water Guidelines</i> and NHMRC (2008) <i>Guidelines for Managing Risks in Recreational Water</i>.</p>	<p>Verify soil and erosion, and stormwater, management controls in SSD-7401 are performing as designed.</p>	<p>Review the above triggers and actions.</p>

7.5 Waste Monitoring and Recording

Waste monitoring, recording and document storage required for operation of the Facility is outlined under Section 11 of the Facility WMP (see **Attachment 4**). In summary, Section 11 of the Facility WMP includes the following items:

- **Section 11.1 Waste Recording** – Outlines items that must be recorded during operation and the method of storage that will be implemented throughout operation.
- **Section 11.2 EPA Waste and Resource Reporting Portal** - Monthly reporting will be undertaken with reference to Section 88 of the *Protection of the Environment Operations Act 1997*. Levy liable facilities must submit a waste contribution monthly report (WCMR) to the EPA to report on all waste received and waste sent for recycling in order to determine whether the facility is liable for payment of the waste levy.
- **Section 11.3 EPL Annual Return** – details the requirements surrounding the submission of the Annual Return for the Facility, including submission date, components of the Annual Return and requirements surrounding potential transfer of the Facility EPL. This information is also outlined under this OEMP in **Section 7.10.1**.
- **Section 11.4 EPA Request for Information** - outlines the methodology that will be undertaken in the event that the NSW EPA requests a written report to address possible pollution from the Facility.
- **Section 11.5 Pollution Complaints** – outlines the methodology to be undertaken in the event of a pollution complaint.
- **Section 11.6 Document Storage** – outlines waste related documents to be retained onsite and period of retention.

7.6 Ground Water Monitoring

Senversa Pty Ltd (Senversa) prepared the Facility SGWMP to outline water monitoring requirements during the operation of the Facility. The full scope of monitoring and reporting with respects to groundwater is outlined in Section 5.0 of the SGWMP (**Attachment 7**) but can be summarised as follows:

- **Baseline monitoring** – undertaken every six (6) months in first two (2) years of operation. A Baseline Groundwater Assessment Report will be prepared following these events in accordance with Section 5.6 of the SGWMP.

- **Periodic** – annual monitoring (including data report) with data reviewed for summary report after three (3) years. Annual monitoring will inform the preparation of an annual data report, which may also be included in the AEMR for that year.
- Additional monitoring when triggered as outlined under Section 5.5, Table 5.4 of the SGWMP. Triggered monitoring events will be included in the AEMR for the year in which they occur.

In addition to the above, an interpretive report will be prepared after three (3) years of operation in accordance with Section 5.6 of the SGWMP.

Triggered events, including responses are outlined under Table 5.4 of the SGWMP (**Attachment 7**). The scope of sampling and level of analysis required for triggered events will be determined in consultation with a suitably qualified contamination / groundwater consultant.

Sampling will utilise groundwater wells installed by Senversa in March-April 2022. The Senversa groundwater wells have been installed in the locations listed below (see Figure 2 of the SGWMP - **Attachment 7**):

- 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 time of works):

- 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.

7.7 Surface Water Monitoring

Surface water monitoring will be undertaken as outlined under Section 4.3 of the SGWMP (see **Attachment 7**), summarized as follows:

- **Weekly monitoring** – general walkover of the site, with results included in AEMR if applicable. This monitoring may result in required maintenance if non-compliances, ponding, spills and / or damage to stormwater structures are identified.
- **Quarterly monitoring** – monitoring and maintenance to be undertaken as stipulated above in **Section 7.4.1**. The results of quarterly monitoring and following actions will be documented to be included in the Facility AEMR as relevant.
- **Surface water sampling** – undertaken at two locations bi-annually (following a rainfall event) for two years then annual (subject to review of results) in accordance with Section 4.3 of the SGWMP. Sampling results and resultant actions will be documented to be included in the Facility AEMR as relevant.
- **Triggered** – undertaken following environmental incident and / or unexpected find. The scope will be dependent on the trigger and should be determined in collaboration with a suitably qualified environmental consultant. Results of these sampling events will be documented for compliance and to be included in the AEMR as relevant.

Due to minimal surface water being detained on site, monitoring locations consist of the following:

- General site areas outside of covered and controlled processing areas (e.g. driveway, car park area, ramp).
- Sand filter bed inflow sampling point (to assess quality of surface water across the site prior to treatment) – **SW1**.
- Ecoceptor outflow sampling point (to assess quality of surface water across the site following treatment and prior to discharge from site) – **SW2**.

Surface water monitoring locations are shown on Figure 2 of the SGWMP (see **Attachment 7**).

7.8 Noise Monitoring

Condition B60 of the SSD-7401 Consolidated COA requires the operator of the Facility to ensure that that noise generated by operation of the Facility does not exceed the noise limits, measured in dB(A) at all residential receivers as per below:

- Day - $L_{Aeq(15 \text{ minute})} - 35$.
- Evening - $L_{Aeq(15 \text{ minute})} - 35$.
- Night - $L_{Aeq(15 \text{ minute})} - 35$.
- Night - $L_{A1(1 \text{ minute})} - 45$.

As stated in **Section 4.3**, the closest residential receiver is located more than 1.5 km from the Facility. In addition, Stage 1 of operations includes the operation of the drill muds Facility, which is located within the semi-enclosed shed to allow all-weather operation and mitigate noise generation. Further mitigation measures (see **Section 5**) will be applied to minimize noise impacts during operation.

Given the number of industrial premises between the Subject Site and the nearest residential receiver, the establishment of noise monitoring locations to monitor compliance with Condition B60 is not considered to be practical as a routine practice. As such, it is proposed that noise monitoring will be driven on a complaints-based system, whereby a noise complaint attributed to Facility operation will be investigated by the Environmental Manager, which may include the establishment of noise monitoring locations in the proximity of the complainant.

In accordance with Condition B60, any monitoring and assessment of noise generated by the Facility will be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the *NSW Industrial Noise Policy*. Monitoring and assessment will be undertaken by a suitably qualified consultant, with the implementation of additional noise mitigation measures in the event that operational noise is intrusive to surrounding receivers and / or is deemed non-compliant with the SSD-7401 Consolidated COA.

Results of any noise monitoring and assessment will be included within the AEMR for the relevant year (see **Section 7.9**). It is noted that a modification in operations may require an update of this OEMP in accordance with **Section 11**.

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

7.9 Annual Environmental Management Review (AEMR)

7.9.1 Monitoring

In accordance with Condition C9, the Facility Operations Manager / Environmental Manager will annually review the environmental performance of the Development to the satisfaction of the Secretary. This review will be undertaken within three months of the completion of each year.

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

A third party, suitably qualified consultant may be engaged to prepare the Annual Environmental Management Review (AEMR) on behalf of reDirect Recycling. The AEMR will be reviewed and issued by reDirect Recycling as per the following section.

7.9.2 Reporting

Annual Monitoring will inform the preparation of the AEMR that will:

- Describe the development that was carried out in the previous calendar year, and the Development that is proposed to be carried out over the next year;
- Include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of these results against the:
 - the relevant statutory requirements, limits or performance measures/criteria;
 - requirements of any plan or program required under this consent;
 - the monitoring results of previous years; and
 - the relevant predictions in the EIS.
- Identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;

- Identify any trends in the monitoring data over the life of the Development;
- Identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and
- Describe what measures will be implemented over the next year to improve the environmental performance of the Development.

In order to fulfil the requirements of Condition C9, each AEMR will be submitted to the Secretary of DPE for acceptance. All actions and recommendations outlined under the AEMR will be undertaken as soon as practicable.

AEMR reporting will include the completion of the Facility CCR (see **Attachment 10**) to track compliance with the SSD-7401 Consolidated COA. In accordance with Section 3.4.3 of the CCR, a copy of the non-compliance summary table (see **Attachment 10**, page 37) will be included in the final AEMR submitted to the Secretary of DPE for acceptance.

In accordance with Condition C15, each AEMR will be uploaded to the reDirect Recycling website following acceptance from the Secretary.

7.10 NSW Environment Protection Authority (NSW EPA)

7.10.1 Waste and Resource Reporting Portal

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

7.10.2 Annual Return (EPL 21092)

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

EPL 21092 was issued on 10 January, as such the relevant **reporting period** is between 10 January each year. The NSW EPA will provide the form to complete the Annual Return each year, to be completed within 60 days from the completion of the relevant reporting period.

The Annual Return will require the following:

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

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

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

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

Where EPL 21092 is transferred to a new licensee (Condition R1.3 of EPL 21092):

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

Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee (ReDirect Recycling) will prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on (Condition R1.4 of EPL 21092):

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

7.10.3 EPA Request for Information

Condition R3 (R3.1 – R3.4) of EPL 21092 outlines the methodology that will be undertaken in the event that the NSW EPA requests a written report to address possible pollution. Under Condition R3.1, the NSW EPA may request a written report in the following circumstances:

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

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

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

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

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

7.11 Independent Environmental Audits

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

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

Division 2B of Part 6 of the EP&A Act applies to these audits, which are for the purposes of ascertaining information in relation to the environmental performance of the Development and the adequacy of strategies, plans and programs. Audits must:

- Be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary.
- Include consultation with the relevant agencies.
- Assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals).
- Review the adequacy of any approved strategy, plan or program required under the abovementioned consents.
- Recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents.

7.12 Facility Website

In accordance with Condition C15, copies of the following document will be maintained on the reDirect Recycling website:

- All current statutory approvals for the Facility.
- Any directions given by the Secretary.
- Application documents (EIS, RTS, SEE).

- Approved Layout Plans and drawings/
- All approved strategies, plans and programs required under the conditions of this consent;
- A comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs.
- A complaint register updated on a monthly basis (see **Section 9.3**).
- The annual reviews of the Development.
- Any independent environmental audit of the Development and reDirect Recycling's response to the recommendations in any audit.
- Any other matter required by the Secretary.

The above information will be maintained up to date on the reDirect Recycling website. Maintaining the information listed above will further support compliance with Condition C12 "*The Applicant must provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent*" of the SSD-7401 COA.

7.13 Monitoring / Management Schedule

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

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

Table 19 Auditing Schedule.

RELEVANT CONDITION(S)	ITEM	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
Overall Compliance	Site Inspections	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Overall Compliance	Quarterly Stormwater Maintenance			✓			✓			✓			✓
B12 (WMP)	Waste Contribution Monthly Report	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
C7 (OTMP)	OTMP and Drivers Code of Conduct Compliance Review			✓			✓			✓			✓
B49 (SGWMP)	Baseline Groundwater Monitoring (first two years of operation)						✓						✓
B49 (SGWMP)	Ongoing Groundwater Monitoring						✓						

RELEVANT CONDITION(S)	ITEM	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
B49 (SGWMP)	Site Walkover (weekly)	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓✓
B49 (SGWMP)	Surface Water Sampling (First two years of operation)						✓						✓
B49 (SGWMP)	Surface Water Sampling (remainder of duration of operation unless determined otherwise)						✓						
C9	Yearly Internal Audit (Annual Environmental Management Review)						✓						
C15	Complaints Register (see Section 9.3).	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
EPL 21092 (R1.1, R1.2, R1.5, R1.7)	EPL Annual Return (Due 60 days from 10 January)	✓	✓										
C13	Initial Independent Audit (Audit Report)	Within one (1) year of the commencement of Operation. Undertaken as outlined under Section 7.11.											
C13	Additional Independent Audits (Audit Reports)	Every three years (1) following the Initial Independent Audit. Undertaken as outlined under Section 7.11.											

8 Compliance Management

8.1 Compliance Tracking

reDirect Recycling have prepared a CCR (**Attachment 10**) with reference to the NSW DPE document *Compliance Reporting – Post Approval Requirements* (2020). The CCR will be completed as part of AEMR reporting each year.

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

8.2 Non-compliances

8.2.1 Identification

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

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

8.2.2 Response

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

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

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

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

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

9 Communicating the OEMP

9.1 Internal Communications

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

Table 20: Minimum internal communications.

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

9.2 External Communications

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

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

Table 21 Minimum external communications.

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

9.3 Community complaints

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

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

Community complaints relating to the Facility can be received via:

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

9.3.1 Handling Procedure

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

Receive

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

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

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

Assistance

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

Investigate

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

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

Action

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

Inform

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

Record

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

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

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

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

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

Preventative Action

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

Dispute Resolution

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

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

10 Document Control

The following documents are controlled documents controlled by Operations Manager:

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

10.1 Document Control Procedure

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

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

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

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

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

11 OEMP Updates

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

11.1 Required Updates

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

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

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

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 Planning Secretary. DPE will be notified of minor changes, seeking feedback as to whether approval of the updated document is required by the Planning Secretary.

11.2 Management Review

In addition to the above, routine monitoring and / or Management Review of the Facility may identify the need for updating the OEMP. The Management Review is facilitated by the Operations Manager or Environmental Manager, ensuring the recommendations of the Management Review are implemented. Under Condition C9, compliance of the Facility is to be assessed and reported on a yearly basis (see **Section 7.4.1**), however additional Management Reviews may be undertaken at any time at the discretion of the Operations Manager or Environmental Manager to assess compliance of operations and to determine whether the OEMP is suitable, adequate and effective for the Facility.

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

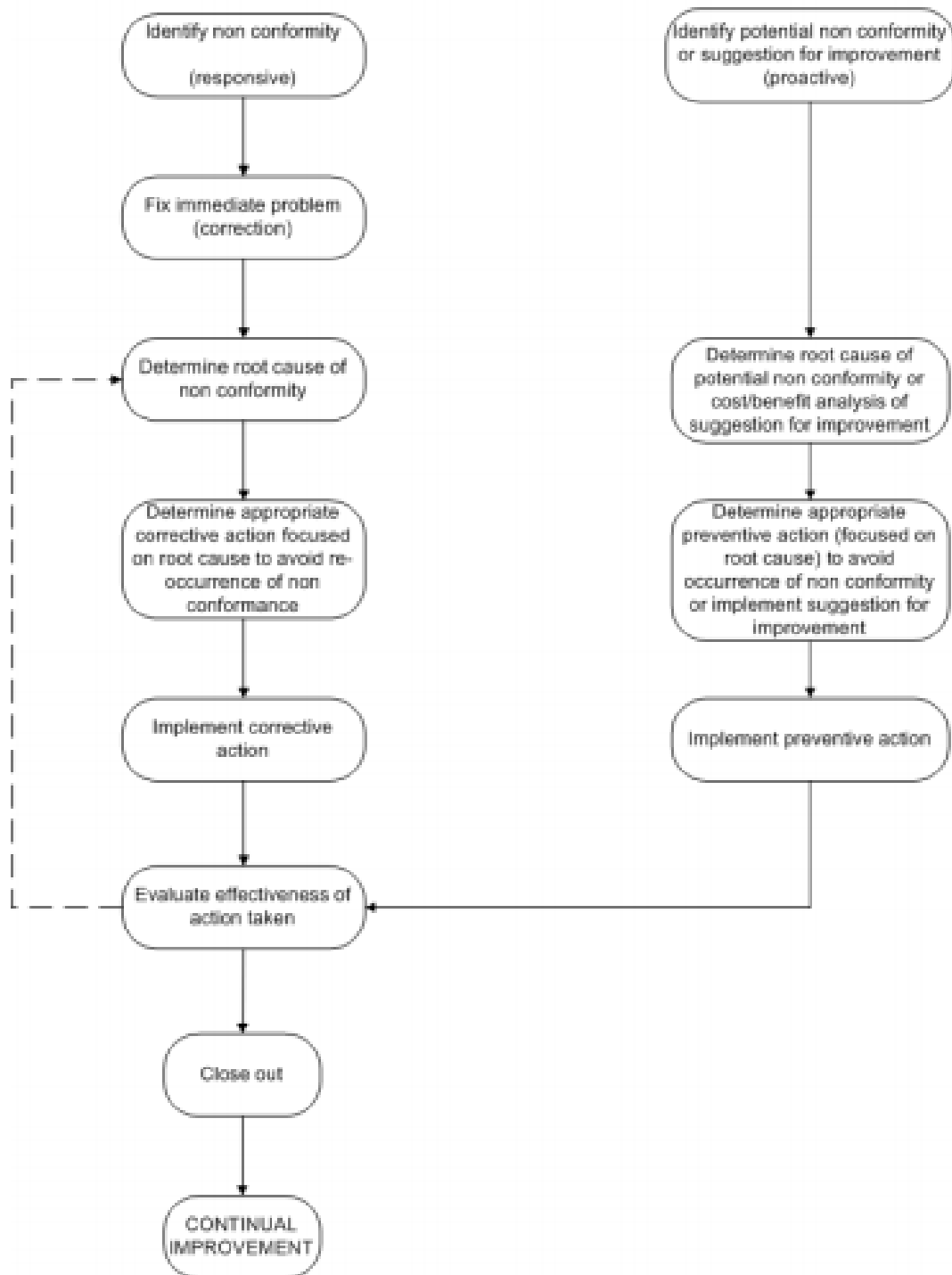
11.3 Staged Development

This OEMP pertains to Stage 1 of operation of the Facility. As such, in accordance with Condition A15 and A16 of SSD-7401 COA, this OEMP (and sub-plans) addresses items relevant to Stage 1 operations only (see **Section 1.1.2**). This OEMP will be updated to address the operation as a whole prior to the commencement of operation of Stage 2 of the Facility (unless further staging occurs).

11.4 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 (see **Section 7**) and consultation (see **Section 9**) may advise improvements or modifications to site management and practices. **Figure 5** below outlines the method of continuous improvement to be applied following monitoring and site auditing events while **Figure 6** below outlines the methods to be applied in the event that an incident occurs onsite (see **Section 6.2**), current or potential future non-conformances are identified during monitoring, or following audits undertaken at the Facility.

Figure 6 Continuous Improvement Process.



12 Conclusion

The OEMP has been in accordance with Condition C4 of SSD-7401 Consolidated COA and considers AS/NZS ISO 14001:2016 *Environmental management systems* and *Environmental Management Systems Guidelines - Risk-based licensing* (NSW EPA, 2015). This OEMP outlines the policies, systems and procedures that reDirect Recycling have committed to for protecting the environment during the operation of the Facility, while also considering how key environmental and operational issues will be managed.

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

Attachment 1: SSD-7401 Consolidated Approval & Approved Plans

Attachment 2: Air Quality and Odour Management Plan

Attachment 3: Stormwater Assessment



Attachment 4: Waste Management Plan

Attachment 5: Trade Waste Agreement

Attachment 6: Flood Emergency Response Plan

Attachment 7: Surface & Groundwater Management Plan

Attachment 8: Emergency Response Plan

Attachment 9: Operational Traffic Management Plan

Attachment 10: Conditions Compliance Report

Attachment 11: Approved Landscape Plans

Attachment 12: Conceptual Management Plan

Decommissioning

Attachment 13: EPL 21092



Attachment 14: Example Environmental Inspection Form

WETHERILL PARK RESOURCE RECOVERY FACILITY

Monitoring Card

Inspection Date	
Staff / Contractor Name	
Staff / Contractor Position	
Staff / Contractor Company	

Purpose of Inspection

<input type="checkbox"/>	General Inspection	<input type="checkbox"/>	Management Plan Audit
<input type="checkbox"/>	Compliance Audit	<input type="checkbox"/>	Other, please state:

Results

Non-compliances	
Opportunities for Improvement	

Recommended Actions

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

