



# Operational Waste Management Plan

ReDirect Recycling Pty Ltd  
Resource Recovery and Recycling Facility

24 Davis Road Wetherill Park, NSW

**Date:** 10/01/2024

**Prepared by:** Space Urban Pty Ltd

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# 1 Introduction

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## 1.1 Project Approval

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

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

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

## 1.2 Project Description

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

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

- Bulk landscape materials and growing media.

The recovered resources will be transferred either directly to end use markets or to other facilities or processors for value adding to achieve maximum value for the beneficial use. Following construction of all stages, 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 WMP covers the operation of the Facility conducted under **Stage 1** of SSD -7404-MOD-3. **Stage 1** includes the drill mud processing area. Operation of **Stage 2** will require an update to this WMP to include the bulk landscape area and the organics processing area. Any further division of Stage 2 into substages (e.g. Stage 2 and Stage 3) will be communicated with DPE as required under the SSD-7401 Consolidated COA.

Facilities covered under this WMP (Stage 1) include:

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

### 1.3 Site Location

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

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

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

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

### 1.4 Land Ownership

The Subject Site is currently owned by Davis Road Property Development Pty Ltd of which Bettergrow Pty Ltd hold a 50% share, however in this instance the sole Applicant was Bettergrow Pty Ltd. Owners consent was obtained for SSD-7401 and all subsequent modification applications as required.

### 1.5 Project Status

Construction of Stage 1 of the Facility is nearing completion. This WMP has been submitted alongside Management Plans required prior to the commencement of operation of the Facility under Schedule 2, Condition C4 of the SSD-7401 Consolidated COA.

## 2 Scope & Objectives

### 2.1 WMP Scope

This WMP has been prepared to address Schedule 2, Condition B12 of SSD-7401, whereby:

*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.*

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

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

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

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

### 2.2 SSD-7401 Conditions of Approval

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

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

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN WMP
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 WMP
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.	<b>Section 8</b>

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN WMP
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"> <li>(a) 100,000 tpa of hydro-excavation, drill muds and fluids, classed as general solid waste (non-putrescible);</li> <li>(b) 150,000 tpa of general solid waste (non-putrescible)</li> <li>(c) 70,000 tpa of food and garden organics classed as general solid waste (putrescible); and</li> <li>(d) 30,000 tpa of packaged and bulk food and liquids, classed as general solid waste (putrescible) and liquid waste respectively.</li> </ul>	<b>Section 8</b>
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.	<b>Section 8</b>
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.	<b>Section 8</b>
SSD -7401	A10	The storage of compost on the site is not permitted.	<b>Section 8</b>
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 to 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.	<b>Section 8</b>
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.	<b>Section 8</b>
SSD -7401	A14	The Applicant must not receive, per week, more than: <ul style="list-style-type: none"> <li>(a) 1,750 tonnes of general solid waste (putrescible) within the FGO building; and</li> <li>(b) 700 tonnes of general solid waste (putrescible) and liquid waste within the FLD building.</li> </ul>	Not relevant to Stage 1 of Operation
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.	<b>Section 11.1</b> <b>Section 11</b>
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.	<b>Section 11.1</b> <b>Section 11</b>
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.	<b>Section 6</b> <b>Section 7</b>
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.	<b>Section 6</b>
SSD -7401	B3	The Applicant must record the amount of waste (in tonnes) received at the site on a daily basis.	<b>Section 11.1</b> <b>Section 11</b>
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.	<b>Section 11.1</b> <b>Section 11</b>
SSD -7401	B5	The Applicant shall only receive waste on site that is authorised for receipt by an EPL.	<b>Section 6</b>

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN WMP
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.	<b>Section 6.3</b>
SSD -7401	B7	The Applicant shall: <ul style="list-style-type: none"> <li>(a) implement auditable procedures to: <ul style="list-style-type: none"> <li>(i) ensure the site does not accept wastes that are prohibited; and</li> <li>(ii) screen incoming waste loads.</li> </ul> </li> <li>(b) ensure that: <ul style="list-style-type: none"> <li>(i) all waste types that are controlled under a tracking system have the appropriate documentation prior to acceptance at the site;</li> <li>(ii) all waste received at the site must be recorded in accordance with clause 27 of the POEO (Waste) Regulation;</li> <li>(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</li> <li>(iv) staff receive adequate training to be able to recognise and handle any hazardous or other prohibited waste.</li> </ul> </li> </ul>	<b>Section 6.2</b>
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, November 2014</i> , or its latest version and dispose of all wastes to a facility that may lawfully accept the waste.	<b>Section 6.3</b>
SSD -7401	B9	All waste must be: <ul style="list-style-type: none"> <li>(a) stored wholly within the designated waste storage areas; and</li> <li>(b) loaded and unloaded within the designated loading and unloading areas.</li> </ul>	<b>Section 5</b>
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: <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation;</li> <li>(b) include suitable provision to monitor the: <ul style="list-style-type: none"> <li>(i) quantity, type and source of waste received on site;</li> <li>(ii) quantity, type and quality of the outputs produced on site; and</li> </ul> </li> <li>(c) ensure that: <ul style="list-style-type: none"> <li>(i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and</li> <li>(ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste, including asbestos.</li> </ul> </li> </ul>	<b>Section 6.3</b>



APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN WMP
SSD -7401	B12	<p>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:</p> <ul style="list-style-type: none"> <li>(a) detail the type and quantity of waste to be received during operation of the Development;</li> <li>(b) include procedures for diversion of waste to other facilities during unexpected machinery breakdown; and</li> <li>(c) details the requirements for non-conforming waste handling and removal.</li> </ul>	This WMP
SSD -7401	B13	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) not commence operation until the Waste Management Plan is approved by the Planning Secretary; and</li> <li>(b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary</li> </ul>	NA
SSD -7401	B15	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) retain disposal records for all waste disposed of under the CDWMP* for 4 years and provide these to the EPA as requested;</li> <li>(b) not commence construction until the CDWMP is approved by the Planning Secretary; and</li> <li>(c) implement the most recent version of the CDWMP approved by the Planning Secretary.</li> </ul> <p><i>*Construction condition – potential administration component during operation</i></p>	<b>Section 6</b>
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	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.	Defer to Water Management Plan
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	<b>Section 6.9</b>
SSD -7401	B32	Wastewater from the hydro-excavation, drill mud and fluids processing facility is not permitted to enter the stormwater management system.	<b>Section 6.9</b>
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"> <li>(a) the wastewater management system is operational; and</li> <li>(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"> <li>(i) all relevant Australian Standards; and</li> <li>(ii) NSW EPA's Spill Management Bunding guidelines.</li> </ul> </li> </ul>	Defer to Water Management Plan

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN WMP
SSD -7401	B34	<p>Prior to the commencement of operations of the FLD building, the Applicant must:</p> <ul style="list-style-type: none"> <li>(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);</li> <li>(b) line the FLD building tip pit with an impermeable barrier to prevent leachate from entering groundwater;</li> <li>(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</li> <li>(d) ensure the liquid food waste tanks are bunded in accordance with all relevant Australian Standards and NSW EPA's Spill Management Bunding guidelines.</li> </ul>	Not relevant for Stage 1 of Operation
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	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.	<b>Section 8</b>
SSD -7401	B69	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>(a) ensure all waste loads are covered unless fully contained with building(s); and</li> <li>(b) maintain the site in a clean and tidy state at all times.</li> </ul>	<b>Section 8</b>

APPROVAL INSTRUMENT	CONDITION NUMBER	CONDITION / COMMITMENT	SECTION(S) IN WMP
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"> <li>(a) detailed baseline data</li> <li>(b) a description of:                             <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(ii) any relevant limits or performance measures/criteria; and</li> <li>(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.</li> </ul> </li> <li>(c) a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;</li> <li>(d) a program to monitor and report on the:                             <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the Development; and</li> <li>(ii) effectiveness of any management measures (see (c) above).</li> </ul> </li> <li>(e) a contingency plan to manage any unpredicted impacts and their consequences;</li> <li>(f) a program to investigate and implement ways to improve the environmental performance of the Development over time;</li> <li>(g) a protocol for managing and reporting any:                             <ul style="list-style-type: none"> <li>(i) incidents;</li> <li>(ii) complaints;</li> <li>(iii) non-compliances with statutory requirements; and</li> <li>(iv) exceedances of the impact assessment criteria and/or performance criteria.</li> </ul> </li> <li>(h) a protocol for periodic review of the plan.</li> </ul>	This WMP

### 2.3 WMP Objectives

The key objective of the Operational WMP is to ensure that waste is minimised. To achieve this objective, ReDirect Recycling (acting on behalf of Bettergrow) will undertake the following:

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

## 2.4 Environmental Protection Licence (EPL 21092)

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

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

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

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

This WMP (and overarching OEMP) have been prepared with reference to management and reporting requirements under EPL 21092, even though it is noted that EPL 21092 currently addresses site preparation and construction of the Facility and is therefore not strictly applicable to operation of the Facility (beyond the inherent obligation to prevent pollution in line with Sections 120, 124, 125, 126 and 142A of the POEO Act).

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

## 3 Development description

### 3.1 Facility Description

Consent for SSD-7401 was initially granted by NSW DPE on 22 December 2017. Consent for SSD-7401-MOD-1 was approved by the NSW DPIE on 21 April 2021. Consent for SSD-7401-MOD-2 was granted by NSW DPIE on 30 November 2021 while consent for SSD-7401-MOD03 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"> <li>(a) 100,000 tpa of hydro-excavation, drill muds and fluids.</li> <li>(b) 70,000 tpa of food and garden organics.</li> <li>(c) 30,000 tpa of packaged and bulk food and liquids.</li> <li>(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&amp;D waste.</li> </ul>
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 <sup>2</sup> . 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 <sup>2</sup> food de-packaging building.
Garden and food organics sorting building (Upper level)	2,260m <sup>2</sup> 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"> <li>• Northern extent of warehouse roof space drains into drains into a 5000 L water tank.</li> <li>• Warehouse roof space, eastern concrete 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.</li> <li>• 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</li> <li>• 73m<sup>2</sup> of concrete road drains directly to the SPEL Ecoceptor 6000 prior to draining into receiving environments.</li> <li>• 317m<sup>2</sup> of hardstand fronting Davis Rd and 1676m<sup>2</sup> of landscaping will drain into existing roadside drainage structures prior to flowing into the receiving environment.</li> </ul>

ELEMENT	SSD-7401-MOD-3 SUMMARY
Received wastes	<ul style="list-style-type: none"> <li>• Soils (ENM and VENM).</li> <li>• Clay/Sands/Stone/Gravels/Aggregates (VENM).</li> <li>• Drilling mud and/or muddy waters from hydro excavation, drilling and pot holing operations.</li> <li>• Garden Mixes/Top Dressings/Mulches.</li> <li>• Garden Organics.</li> <li>• Food and Garden Organics.</li> <li>• Solid Food Waste.</li> <li>• Liquid Food Waste.</li> <li>• Sawdust.</li> <li>• Spent filter sand media.</li> <li>• Street Sweepings.</li> <li>• Stormwater Waste.</li> <li>• Wood Waste.</li> <li>• Asphalt Waste (including asphalt resulting from road construction).</li> <li>• Building and demolition waste.</li> <li>• Rail Ballast.</li> </ul>
Finished products	<ul style="list-style-type: none"> <li>• Finished Products include Mine Mix, Naturaliser, BioNRich, Earth4Turf.</li> <li>• Clay/Sands/Stone/Gravels/Aggregates.</li> <li>• Engineering material as per the EPA exemption.</li> <li>• Liquid fraction either to sewer, to composting facility, or to another licenced facility for further processing/re-use.</li> <li>• Garden Mixes/Top Dressings/Mulches.</li> <li>• Material transferred to EPA licenced composting sites for the production of a range of growing media suitable for domestic and agricultural use.</li> <li>• Material transferred to EPA licenced composting sites for the production of a range of growing media suitable for domestic and agricultural use.</li> <li>• Liquid fraction applied to processed FOGO, composting, or sent to another licenced facility for further re-use.</li> <li>• Sawdust.</li> <li>• Component of Mine Mix, Naturaliser, BioNRich, Earth4Turf.</li> <li>• Washed aggregate, organics transferred to EPA licenced composting site.</li> <li>• Wood waste screened and re-used in particle board manufacture - unsuitable wood sent to an EPA licenced facility.</li> <li>• Washed aggregate for re use in recycled products.</li> </ul>
Traffic Generation	<ul style="list-style-type: none"> <li>• Up to 432 movements per day for Stage 1 and Stage 2 combined operation.</li> </ul>
Workforce	<ul style="list-style-type: none"> <li>• Up to 40-50 full-time equivalent construction jobs. Up to 25 operational jobs.</li> </ul>

### 3.1.1 Operating hours

Table 3 provides the approved operational hours.

**Table 3 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	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours
FLD Facility	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours	Monday to Sunday, 24 Hours
Landscaping Material Supplies Facility	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 3**:

- 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.

### 3.2 Key contact details

**Table 4** lists the key contacts for the Facility.

**Table 4 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 Spills Response	To be arranged
Complaints and Feedbacks	Wella Way Head Office 02 4340 9800

**Table 5** lists the contact details for the regulatory authorities that have an interest in the operations of the Facility.

**Table 5 Regulatory Authority Contact List.**

REGULATORY AUTHORITY	CONTACT DETAILS
Department of Planning and Environment (DPE) Head Office - Parramatta	Ph: 1300 420 596 (Planning) Ph: (02) 9338 6600 (Industry) Ph: 1300 361 967 (Environment, Energy and Science) info@planning.nsw.gov.au
Environment Protection Authority (EPA) Environment Line	131 555 or 02 9995 5555 info@epa.nsw.gov.au
Fairfield City Council	(02) 9725 0222 mail@fairfieldcity.nsw.gov.au
SafeWork NSW Incident notification	13 10 50
Fire and Rescue NSW	Smithfield Fire Station (permanently staffed): 02 9493 1041 Yennora Fire Station (permanently staffed): 02 9493 1073
NSW Police and / or NSW Ambulance Service	000

## 4 Legislative and Statutory Framework.

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### 4.1 Legislation

Legislation relevant to waste management includes:

- *Environmental Planning and Assessment Act 1979* (EP&A Act);
- *Protection of the Environment Operations Act 1997* (POEO Act);
- *Protection of the Environment Operations (General) Regulation 2009*;
- *Protection of the Environment Operations (Waste) Regulation 2014*;
- *Waste Avoidance and Resource Recovery Act 2001* (WARR Act);
- *Contaminated Land Management Act 2021*;
- *National Greenhouse and Energy Reporting Act 2007* (Cth);
- *Biosecurity Act 2015*; and
- *Environmentally Hazardous Chemicals Act 1985*.

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

### 4.2 Guidelines and Standards

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

- Waste Classification Guidelines Part 1: Classifying waste (NSW EPA, 2014);
- Waste Classification Guidelines Part 2: Immobilisation of waste (NSW EPA, 2014);
- Waste Reduction and Purchasing Policy 2011-2014 (WRAPP), NSW Government;
- Guidelines on Resource Recovery Exemptions - Land Application of Waste Materials as Fill (2011, DECCW);
- Storing and Handling Liquids, Environmental Protection: Participants Manual (NSW DECC, 2007); and
- National Environment Protection (Assessment of Site Contamination) Measure 1999 (National Environment Protection Council, April 2013).
- Resource Recovery Order under Part 9, Clause 93 of the *Protection of the Environment Operations (Waste) Regulation 2014* - The treated drilling mud order 2014
- Waste Levy Guidelines (NSW EPA, 2018).



# 5 Site Processing

## 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.

See **Section 5** for further information regarding details to be recorded for the tracking of materials being transported to and from the Facility.

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.

In the event of weighbridge breakdown, the above details will be recorded manually, to be uploaded into the system as soon as possible following resumption of operation.

## 2. Tipping and inspection of waste

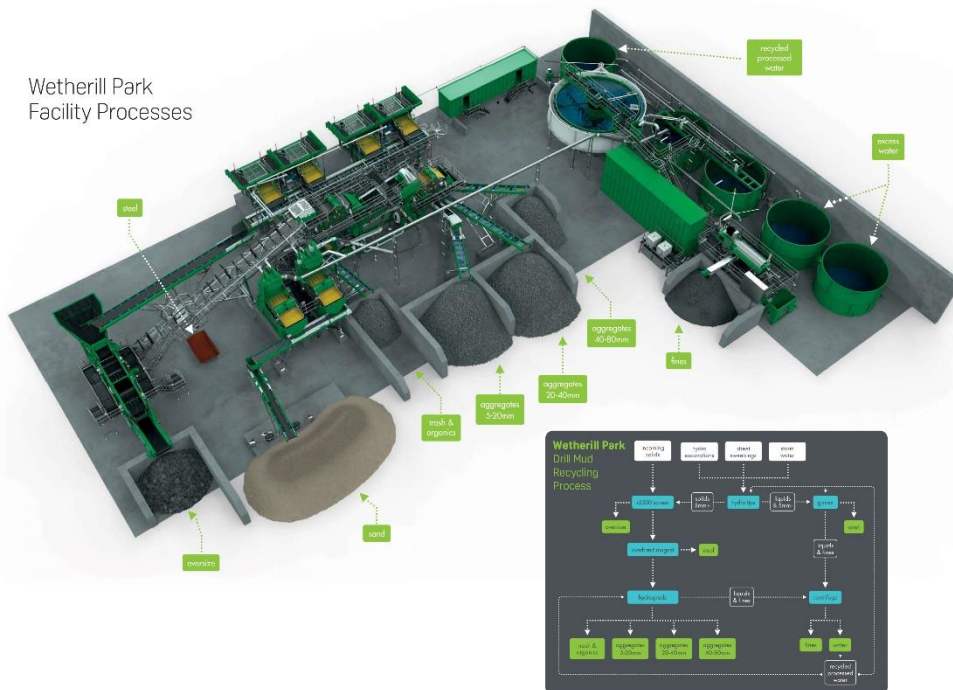
There are 2 major categories of waste that will be accepted on site. Wet and Dry.

**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. The solids that are separated by the Hydrotip are conveyed to the R2500 screen. The R2500 is the entry point for dry material.



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. Output products from the drill muds processing system will include:

- 0-5 mm washed sand
- 5-20 mm washed aggregate
- 20-40 mm washed aggregate
- 40-80 mm oversize washed stone
- Dewatered fines cake
- Organic/Trash material
- Ferrous Metals
- Wastewater.

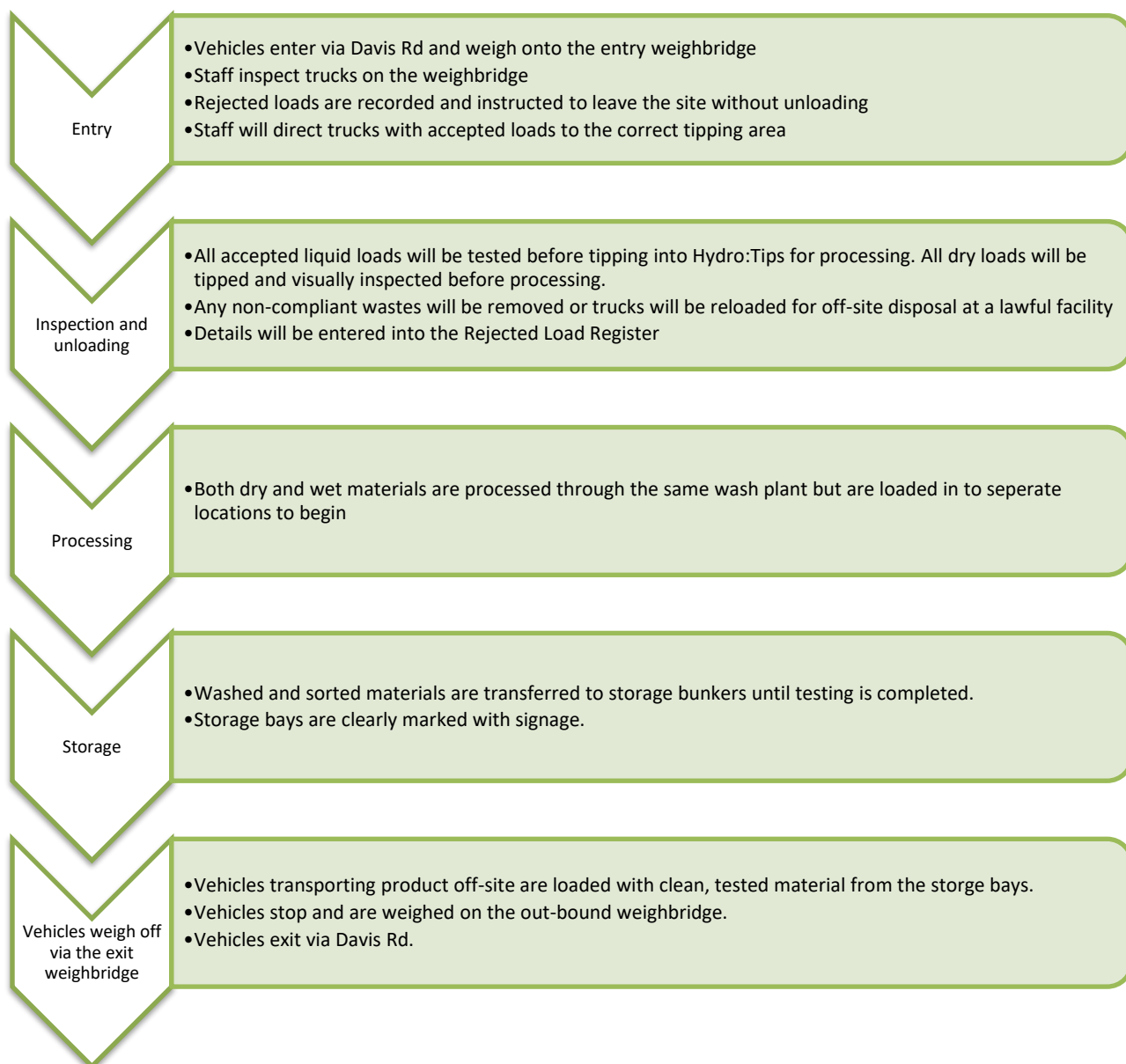
In addition to the above, the R2500 processing will produce an oversize material (over 80mm). This material may be fed through the machine a second time if easily broken apart, otherwise the material will be taken off site, likely to a company with a licence to crush material.

#### **4. Storage**

Clean processed materials will be stockpiled in bays until required testing is complete. 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 1. Process flow chart for the operation of the Waste Management and Recycling Facility.**

### 5.1 Waste materials to be received

The waste materials to be accepted and recycled **under Stage 1 of operations** are given below. The waste classification of each material under the NSW EPA's *Waste Classification Guidelines* (2014) is also given (**Table 6**).

**Table 6. Wastes and Raw Materials received at the Facility**

RECEIVED WASTES AND RAW MATERIALS	WASTE CLASSIFICATION	ESTIMATED ANNUAL QUANTITY PROCESSED ONSITE (TONNES)
Soils (ENM and VENM)	General Solid Waste (non-putrescible)	20,000
Clay/Sands/Stone/Gravels/Aggregates (VENM)	General Solid Waste (non-putrescible)	25,000
Drilling mud and/or muddy waters from hydro excavation, drilling and pot holing operations	Liquid Waste	100,000
Sawdust	General Solid Waste (non-putrescible)	0
Spent filter sand media	General Solid Waste (non-putrescible)	5,000
Street Sweepings	General Solid Waste (non-putrescible)	35,000
Stormwater Waste	Liquid Waste	35,000
Wood Waste	General Solid Waste (non-putrescible)	0
Asphalt Waste (including asphalt resulting from road construction)	General Solid Waste (non-putrescible)	1,000
Building and demolition waste	General Solid Waste (non-putrescible)	1,000
Rail Ballast	General Solid Waste (non-putrescible)	1,000

## 5.2 Products transported from the facility

A summary of products for off-site transfer **under Stage 1 of operation** is provided in **Table 7** below.

**Table 7 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

RECEIVED WASTES AND RAW MATERIALS	PROCESSING OR END USE	FINISHED PRODUCTS
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

### 5.3 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. No processing of bulk landscape materials will occur.

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.

## 6 Waste Monitoring Program

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As stated in **Section 1.2**, the main waste types and materials to be accepted at the site under complete operation include:

- Hydro-excavation and drill muds (Stage 1);
- Garden organics, commingled food and garden organics, and food waste (Stage 2); and
- Bulk landscape materials and growing media (Stage 2).

However, this WMP has been prepared to address **Stage 1** of operation only, relating to the hydro-excavation and drill muds facility. The delivery, processing and export of wastes from the hydro-excavation and drill muds processing area is broadly explained earlier in this WMP in **Section 5**.

This Section has been prepared to address the requirement for a Waste Monitoring Program as outlined under Condition B11 of the SSD-7401 Consolidated COA.

### 6.1 Potential Waste Streams

**Table 8** outlines expected waste generation during operation of Stage 1 of the Facility.

**Table 8: Potential waste streams generated during operation**

TYPE OF WASTE TO BE GENERATED	PROPOSED ONSITE STORAGE AND TREATMENT FACILITIES	DESTINATION
Cardboard packaging / Office paper	Paper and Cardboard to be separated for recycling at source. Paper and Cardboard to be reused where possible, or compacted for recycling	Recycling contractor for recycling
Plastic packaging	Bale up on-site. Store in waste storage and recycling area(s)	Recycling contractor for recycling. Non-recyclable plastics to be disposed as general waste
Pallets	Stored on-site in designated area	Return to supplier for reuse
Waste/reject product	Store in waste storage and recycling area	Returned to supplier
Liquid wastes	Wastewater from drill mud/hydro-excavation to be stored in the following locations: <ul style="list-style-type: none"> <li>• 1 x 100,000L tank for wastewater reuse.</li> <li>• 2 x 100,000L tank for wastewater storage and disposal.</li> </ul>	Wastewater to be reused where required. Additional wastewater is to be disposed under Trade Waste Agreement with Sydney Water.
Recyclable glass, aluminium, metal, and plastic containers	To be separated at source as far as practicable for recycling by contractor	Recycling contractor for recycling
Used Toner Cartridges	To be stored on site for collection by toner supplier	Toner supplier for recycling
General waste	To be stored inside warehouse or retail facility or suitably screened from public areas	Disposed by licenced waste contractor to licenced waste disposal facility
Human wastes	Discharged to sewer	Discharged to licenced facility approved to accept untreated effluent

Waste storage and recycling receptacles are to be located nearby all generation sources. Waste storage and recycling bins to be clearly labelled. The site manager or representative would be responsible for maintaining the waste storage and recycling area, for ensuring bins are emptied and collected as required, and for ensuring that no contamination of waste streams is occurring.

## 6.2 Waste Transport

All waste transport related information will be recorded on an online register, to be stored for the lifetime of the development (Condition A17 of SSD-7401 Consolidated COA).

All waste records and weighbridge records will be made available for review by the NSW EPA (or other relevant authority) upon request.

### 6.2.1 Waste Deliveries to the Facility

Drill muds hydro-excavation waste received at facility will enter via Davis Rd. In accordance with Clause 27 of the *Protection of the Environment (Waste) Regulation 2014*, the following information will be collected by each vehicle making a delivery to the Facility:

- a) Date.
- b) Gross, tare and net weights.
- c) Product description.
- d) Product origin.
- e) Product supplier (if necessary i.e. different from origin).
- f) Carrier.
- g) Truck registration.
- h) Any other details as per the EPA's Benchmark Weighbridge Requirements (see **Attachment 1**). 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.

### 6.2.2 Waste Transport from the Facility

Outgoing loads will be measured either utilizing the site weighbridge or using scales mounted upon site machinery (e.g. loaders) to quantify the load of material transported offsite.

With reference to Clause 28 of the *Protection of the Environment (Waste) Regulation 2014*, the following information will be collected as applicable for each load transported from the Facility for use, recovery, recycling, processing or disposal at another place:

- a) The amount of any waste contained in the load, its waste type and (except where the waste is trackable liquid waste) its waste stream,
- b) The amount of any other material contained in the load and a description of the nature of that other material,
- c) The amount of any waste contained in the load that is spoil generated by dredging activities,
- d) The date and time the load is transported from the facility.
- e) The registration number of the vehicle used to transport the load.
- f) The name and address of the place to which the load is transported and the code or number of any environment protection licence for that place.
- g) In the case of waste or other material in the load that is removed from a stockpile required to have a unique identification number under clause 31(1)(a) of the *Protection of the Environment (Waste) Regulation 2014*—the unique identification number,
- h) In the case of an occupier who is required to pay contributions under Section 88 of the *Protection of the Environment Operations Act 1997*—details of any recycling, mixing, blending or processing of any waste in the load, including the composition as a proportion of waste and other material in any waste-derived material in the load.

In accordance with Clause 32 of the *Protection of the Environment (Waste) Regulation 2014*, the above details will also be recorded for any 'waste' loads transported from the Facility that were measured by means other than the onsite weighbridge (e.g. scales on loaders).

### 6.2.3 Other vehicles utilised during operation

In accordance with Clause 29 of the *Protection of the Environment (Waste) Regulation 2014*, ReDirect Recycling will record the following particulars in relation to vehicles that enter the Facility for a purpose related to the operation of the Facility (whether or not the vehicle is being, or is intended to be, used to deliver or transport waste):

- a) The date and time on which the vehicle enters the facility.
- b) The date and time on which the vehicle leaves the facility.
- c) The registration number of the vehicle.
- d) The purpose of entry.
- e) The weight of the vehicle.



## 6.3 Inspection of Waste & Non-Conforming Waste Procedure

The key processes for managing all waste at the site are detailed below.

### 1. Weighing loads at the weighbridge and data recording

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

### 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 (in accordance with *Operational Waste Management Plan*, Redirect [2022]). 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 visual inspection at the weighbridge the material will be checked against the waste classification report. The load will be tipped onto a concrete hardstand 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.

A designated undercover quarantine bay will be allocated for material found to contain suspected contamination. In the event contaminated materials are discovered post inspection they will be moved to the designated quarantine bay. If asbestos containing materials are suspected to be present in an on-site stockpile, that entire stockpile will be deemed as asbestos containing material, quarantined, classified in accordance with *Waste Classification Guidelines Part 1: Classifying Waste* (NSW EPA 2014), and disposed at a licensed waste facility.

All operators employed at the facility will be trained specifically to undertake visual inspections of waste materials and signs of potential contamination.

## 6.4 Waste Classification Procedure

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

### Step 1: Is it 'special waste'?

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

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

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

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

Liquid wastes are sub-classified into:

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

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

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

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

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

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

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

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

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

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

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

## 6.5 Reuse and Recycling

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

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

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

## 6.6 Resource Recovery Orders

The processing and production of treated drilling mud will be undertaken in accordance with the Facility Environmental Protection Licence (EPL) to meet product requirements as outlined under the Resource Recovery Order (under Part 9, Clause 93 of the *Protection of the Environment Operations (Waste) Regulation 2014*). Testing and recording requirements under a relevant Resource Recovery Order will be required in order for the Resource Recovery Order to remain applicable for site operations.

For reference, drilling mud and drilling mud fluid is defined as the following under the *treated drilling mud order 2014*:

- **Drilling fluid** means a mixture of water and chemical additives including but not limited to bentonite, soda ash (sodium carbonate), sodium hydroxide, lime and polymers.
- **Drilling mud** means a mixture of naturally occurring rock and soil, including but not limited to materials such as sandstone, shale and clay, and drilling fluid generated during drilling operations such as horizontal directional drilling or potholing. This does not include drilling mud that has been generated by:
  - Deep drilling for mineral, gas or coal exploration; or
  - Drilling through contaminated soils, acid sulphate soils (ASS) or potential acid sulphate soils (PASS).

Treated drill fines are likely to constitute recovered aggregate under the NSW EPA *recovered aggregate order 2014* or treated drilling mud under the *NSW EPA treated drilling mud order 2014* following suitable testing and verification processes onsite.

Additional EPA exemptions and orders may be utilised throughout the operation of the Facility. Additional exemptions that are likely to be utilised include (but are not limited to) the following:

- *The stormwater exemption 2014*.
- *The excavated natural material exemption 2014*.

- The excavated public road material exemption 2014.
- The recovered railway ballast exemption 2014.

## 6.7 Waste Handling and Storage

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

- Liquid wastes (other than wastewater) - to be stored in appropriate containers in bunded areas until transported offsite. Bunded areas will have the capacity to hold 110 per cent of the liquid waste volume for bulk storage or 120 per cent of the volume of the largest container for smaller packaged storage.
- All other recyclable or non-recyclable wastes - to be stored in appropriate covered receptacles (e.g. bins or skips) in appropriate locations onsite and contractors commissioned to regularly remove/empty the bins to approved disposal or recycling facilities.
- Wastewater – described below in **Section 6.9**.

## 6.8 Waste Disposal

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

Where possible wastes will be removed off-site to a recycling facility or will be disposed of at a licensed waste facility. Waste contractors and licensed waste management facilities that may be available for offsite waste disposal are included in **Table 9**. Details of waste types, volumes and destinations are to be recorded in the Waste Tracking Register in **Attachment 2**.

**Table 9: Waste contractors and licenced facilities**

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

## 6.9 Wastewater Disposal

The Facility has been designed to accept non contaminated hydro-excavation mud. The drill mud processing undertaken onsite aims to recover and re use the maximum quantity of resources. This will be achieved using a customised washing plant capable of treating over 100 tonnes of incoming material per hour. The process includes a series of shaker screens, high pressure spray bars and scrubbing systems, flocculation and a centrifuge to remove ultra-fine particles. The Facility is capable of reusing water to assist in the process but it will be a water positive process.

In accordance with Schedule 2, Condition B30, ReDirect Recycling are currently in the negotiation for a Trade Waste Agreement (TWA) with Sydney Water, allowing for the transfer of wastewater to sewer once it meets acceptable standards (as outlined under the TWA). in the following quantities:

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 the Facility OEMP 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.

## 6.10 Waste Levy

Licensed waste facilities are liable to pay a levy under Section 88 of the *Protection of the Environment Operations Act 1997*. Resource recovery facilities are required to record waste inputs and outputs and submit monthly reports to the NSW EPA that will determine whether they are required to pay a waste levy. The facility has a system in place using the Facility weighbridge and scales placed on site machinery for recording and reporting of waste transfer as described in this WMP.

In addition, operation of Stage 1 the Facility includes the screening of drill mud and hydro-excavation waste for possible signs of contamination. As such the proposed hydro-excavation and drill muds Facility has been designed such as that the Facility does accept not trackable liquid waste as defined under Schedule 1 of the *Protection of the Environment Operations (Waste) Regulation 2014*.

## 6.11 Waste Recording & Reporting

Waste related recording requirements are outlined under **Section 11** of this WMP.

## 7 Diversion of Waste Products

Schedule 2, Condition B12 of the SSD-7401 Consolidated COA requires this Operational WMP to address “*procedures for diversion of waste to other facilities during unexpected machinery breakdown*”. Construction of the Facility included the provision of an approximately 250,000 L storage pit located immediately west of the hydro-tips. This storage pit provides temporary storage in the event of a short-term machinery breakdown or delivery of products in excess of site processing capability. In the event the breakdown cannot be remedied within one (1) hour, one of the two following options will be implemented:

- Hire suitable machinery to replace broken down equipment (where possible).
- Divert materials being transported to the Facility (see below).
- Cancel incoming loads to the Facility until the breakdown is fixed. This will only occur in the event material diversion is not possible.

In the event of a breakdown requiring the diversion of materials is required, the Vineyard Waste Resource Recovery Facility, located at 48 Industry Road Vineyard NSW 2765 (operated by ReDirect Recycling) shall be the first point of contact.

The Vineyard Waste Resource Recovery Facility is currently permitted to store up to 6000 tonnes of waste product onsite at any one time. This should be satisfactory for short-term diversion of hydro-excavation, drill muds and fluids (liquid waste) given that the Wetherill Park Facility has been designed to process up to 100 tonnes of material per hour.

In the event that an extended breakdown is deemed possible, or the Vineyard Waste Resource Recovery Facility does not have capacity for extended diversion of hydro-excavation, drill muds and fluids (liquid waste), the owners / operators of the facilities listed below in **Table 10** will be contacted for diversion of material. Owners / operators listed in **Table 10** are located within the Greater Sydney region and hold a current EPL under the POEO Act for the *Non-thermal treatment of liquid waste* (as of 9 December 2021). Diversion of material to facilities listed under **Section 6.8 (Table 9)** will be the last option in the event of prolonged machinery breakdown onsite.

**Table 10: Premises in Sydney Region with EPL for *Non-thermal treatment of liquid waste***

POEO LICENCE NUMBER	POEO LICENCE TYPE	NAME	LOCATION
20875	Non-thermal treatment of liquid waste	DEMAST PTY LTD	7 Long Street, SMITHFIELD, NSW 2164
20694	Non-thermal treatment of liquid waste	MAINSTREAM RECYCLING PTY LIMITED	6 SLEIGH PLACE, WETHERILL PARK, NSW 2164
5065	Non-thermal treatment of liquid waste	SUEZ RECYCLING & RECOVERY PTY LTD	NEW ILLAWARRA ROAD, LUCAS HEIGHTS, NSW 2234

## 8 Inductions and Training

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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).

### 8.1 General Site Induction

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

- Relevant details of the facility OEMP and this WMP including purpose and objectives.
- Overview of sub-plans of the facility OEMP and this WMP, including specific requirements relating to personnel onsite.
- Key environmental issues.
- Environmental licenses, permits and approval conditions.
- Relevant legislation.
- Environmental management requirements and responsibilities.
- Mitigation measures for the control of environmental issues.
- Environmental Incident response and reporting requirements.
- Information relating to the location of environmental constraints.
- Environmental personnel and key contacts.
- Appropriate response and management of complaints received from the public, government agencies or other stakeholders in accordance with the protocol detailed in **Section 10.2**.
- Appropriate response and management of environmental incidents in accordance with the strategy detailed in Section 6 of the Facility OEMP.

### 8.2 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. 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.

### 8.3 General Environmental Awareness

All employees and contractor personnel shall receive Environmental Awareness training. The General Environmental Awareness Training program make be undertaken concurrently with 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.

### 8.4 Tool-box Talks

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

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

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

## 8.5 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 in internal management system within the *DataStation* for the facility.

## 8.6 Training Review

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

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



## 9 Mitigation Measures

In addition to procedural items stated in the preceding Sections of this WMP, mitigation measures stated under **Table 11** below will be applied for the duration of operation for the Facility. Mitigation measures stated under **Table 11** relate to the operation of **Stage 1** (drill muds processing) only, with additional items to be addressed under a subsequent iteration of this WMP prior to the commencement of operation of **Stage 2** of the facility (noting that subsequent Staging may occur with concurrence from the Planning Secretary).

**Table 11: Waste related management and mitigation measures to be applied to the Facility**

CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
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: <ul style="list-style-type: none"> <li>(a) 100,000 tpa of hydro-excavation, drill muds and fluids;</li> <li>(b) 70,000 tpa of food and garden organics;</li> <li>(c) 30,000 tpa of packaged and bulk food and liquids; and</li> <li>(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&amp;D waste.</li> </ul>	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



CONSIDERATION	CONTROL	RESPONSIBILITY	TIMING / FREQUENCY
	All waste will be: (a) stored wholly within the designated waste storage areas; and (b) loaded and unloaded within the designated loading and unloading areas.	Site Management	On-going
	Subcontractors will be informed of site waste management procedures.	Operations Management	On-going
	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.	Operations 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

## 10 Incidents and Complaints

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### 10.1 Incident Management

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

Incident reporting will occur as outlined under Section 6.2.2 of the Facility OEMP. In accordance with Condition C10 of SSD-7401, **within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment**, a report shall be supplied to DPE outlining the basic facts. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventive measures. That report must be submitted to the Planning Secretary no later than 14 days after the incident or potential incident.

### 10.2 Complaint Management

A community complaints 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 and/or; and
- Through a government agency (i.e. Council or EPA).

#### 10.2.1 Complaint Handling Procedure

Upon becoming aware of a complaint, reDirect Recycling Site Management are to 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 of the Facility OEMP 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 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 the 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.

# 11 Monitoring and Reporting

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Ongoing monitoring and reporting will be utilised to inform Facility compliance, to be summarised under the relevant AEMR for each year. Monitoring and reporting in-line with the SSD-7401 Consolidated COA are to be undertaken as outlined under Section 7 of the Facility OEMP. Waste related monitoring and reporting requirements are summarised below.

## 11.1 Waste Recording

In accordance with Conditions A17, A18, B3 of the SSD-7401 Consolidated COA, Clauses 27-33 of the *Protection of the Environment Operations (Waste) Regulation 2014* and the NSW EPA *Waste Levy Guidelines* (2018), the following information, where applicable, shall be recorded and held electronically for the lifetime of Facility operation:

- Incoming records as per **Section 6.2.1**.
- Outgoing records as per **Section 6.2.2**.
- Details of vehicles utilised onsite during operation (including vehicles not intended for waste transport) as per **Section 6.2.3**.
- Weighbridge records.
- Machinery scales records (where utilised in quantification of product in lieu of weighbridge).
- Waste classification of waste materials received onsite.
- Amount (in tonnes) of waste / materials received onsite each day.
- Waste classification of waste materials transported from site.
- Data from sampling and classification of wastes / materials onsite.
- Details regarding stockpiles of waste material onsite.
- Records from sampling, monitoring and classification of materials / wastes as relevant under a Resource Recovery Order and / or exemption (where utilised).
- Quantum of material processed (sorted by type) on each day of operation. In accordance with the NSW EPA *Waste Levy Guidelines* (2018), the quantum of material shall be measured in tonnes and will be rounded to two (2) decimal places (0.005 rounded upwards).
- List of personnel / contactors inducted to the Facility

Records will be stored in the following manner (as per Part 3 of *Protection of the Environment Operations (Waste) Regulation 2014*):

- Original records of the information (such as paper documents) will be retained to allow provision to the NSW EPA if requested (in their original form).
- Electronic record-keeping systems will be designed so that details of any adjustments to records are recorded against the adjusted record, including that the record has been amended and the extent of the change.
- All electronic records will be backed up weekly and the back-up records are stored in a secure electronic location.
- Quantity of waste will recorded to two decimal places (e.g. 14.22 tonnes)
- All electronic records will be stored in a format that allows download / export by the NSW EPA to a suitable electronic format (e.g. xls, .xlsx, .csv or .dbf) for review.

Records will be made available to the NSW EPA (or another authorised officer) upon request.

In addition to the above, it is noted that the following reporting requirement (Clause 30 of The *Protection of the Environment Operations (Waste) Regulation 2014*) will need to be adhered to in the event that waste listed under **Table 12** (Clause 15(1) of the *Protection of the Environment Operations (Waste) Regulation 2014*) will be utilised onsite in the manner described below:

*“The occupier of a scheduled waste facility who is required to pay contributions under section 88 of the Act must record the following information in relation to any waste of a kind referred to in the second column of the table to clause 15(1) that is used at the facility for a purpose specified opposite in the third column of that table—*

- a) the amount of waste and its waste type,*
- b) the nature of the purpose,*
- c) the date the waste is used,*
- d) particulars of any certificate issued under clause 15 relating to the use of waste for the purpose.”*

**Table 12: Waste requiring approval from NSW EPA for use onsite**

ITEM	KIND OF WASTE	PURPOSE
1	New asphalt, or new concrete, obtained at a batching plant.	Roads or other construction works.
2	Materials that meet the specifications in the Waste Levy Guidelines.	Roads of a kind specified in the Waste Levy Guidelines or other construction works of a kind specified in the Waste Levy Guidelines.
3	Any one or more of the following— (a) geonets, (b) geotextiles, (c) drainage layer media (having a thickness not greater than 300 millimetres) placed over landfill base and side liners, (d) piping.	Leachate collection systems that are associated with leachate management and are in accordance with the conditions of an environment protection licence.
4	Any one or more of the following— (a) geomembranes, (b) geotextiles, (c) clay liners (having a thickness not greater than 900 millimetres), (d) piping.	Landfill lining systems (including landfill base and side liners) that are in accordance with the conditions of an environment protection licence.
5	Any one or more of the following— (a) geomembranes, (b) geotextiles, (c) clay liners (having a thickness not greater than 900 millimetres), (d) piping, (e) drainage layer media (having a thickness not greater than 300 millimetres) placed over landfill base and side liners.	Stormwater management systems.
6	Any one or more of the following— (a) drainage gravels, (b) piping.	Any one or more of the following that are in accordance with the conditions of an environment protection licence— (a) landfill gas collection systems that are associated with landfill gas management, (b) groundwater management systems, (c) drainage.
7	Any one or more of the following— (a) plastic sheeting, (b) tarpaulins, (c) spray-on foam.	Daily cover for waste at landfill sites, in accordance with the conditions of an environment protection licence.
8	Virgin excavated natural material, or potential acid sulfate soils, not mixed with any other kind of waste.	Placement of the material, ores or soils (in accordance with the conditions of an environment protection licence) to rehabilitate a sand mine.
9	Waste of any kind.	Final capping works, in accordance with the conditions of an environment protection licence, at landfill sites.
10	Waste of any kind.	Bedding layers to protect landfill lining systems if the layers are of a kind specified in the Waste Levy Guidelines.
11	Biofilter media and aggregate layers.	Biofilters for pollution or odour control (including underlying aggregate layers) that are in accordance with the conditions of an environment protection licence.

## 11.2 EPA – 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.

## 11.3 EPL – Annual Return

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.

## 11.4 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; and
- any other relevant matters.

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

## 11.5 Pollution Complaints

Pollution related complaints received are 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 will be produced to any authorised officer of the EPA who asks to see them.

## 11.6 Document Storage

Waste related documentation that will be retained onsite, including the period of retention, is listed in **Table 13** below.

**Table 13: Documentation to be retained onsite**

DOCUMENT	PERIOD OF RETENTION	SOURCE	NOTES
Construction and Demolition Waste Disposal Records	Four years post construction / demolition	SSD-7401 Consolidated COA	To be provided to the NSW EPA as requested.
EPL Annual Return	Four years from issue	EPL	In accordance with Condition R1.6 of EPL 21092, copies of Annual Returns will be retained for at least four (4) years.
EPA Request for Information	Four years from issue	EPL	No retention period stated, however a period of four (4) years will be applied to align with other EPL document retention requirements.
Complaints Register	Four years from date complaint was made	EPL	To be provided to the NSW EPA as requested. Updated monthly at minimum. Maintained on project website.

DOCUMENT	PERIOD OF RETENTION	SOURCE	NOTES
Incident Register	Lifetime of operations	Conditions C10 and C11 of SSD-7401 Consolidated COA.	
Waste Records outlined in <b>Section 11.1</b>	Lifetime of operation	<p>Conditions A17, A18, B3 of the SSD-7401 Consolidated COA.</p> <p>Clauses 27-33 of the <i>Protection of the Environment Operations (Waste) Regulation 2014</i>.</p> <p>NSW EPA <i>Waste Levy Guidelines</i> (2018)</p>	<p>Records will be stored in the following manner (as per Part 3 of <i>Protection of the Environment Operations (Waste) Regulation 2014</i>):</p> <ul style="list-style-type: none"> <li>• Original records of the information (such as paper documents) will be retained to allow provision to the NSW EPA if requested (in their original form).</li> <li>• Electronic record-keeping systems will be designed so that details of any adjustments to records are recorded against the adjusted record, including that the record has been amended and the extent of the change.</li> <li>• All electronic records will be backed up weekly and the back-up records are stored in a secure electronic location.</li> <li>• Quantity of waste will recorded to two decimal places (e.g. 14.22 tonnes)</li> <li>• All electronic records will be stored in a format that allows download / export by the NSW EPA to a suitable electronic format (e.g. xls, .xlsx, .csv or .dbf) for review.</li> </ul>



## 12 Conclusion

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

This WMP has been prepared in accordance with the SSD-7401 Consolidated COA to address waste management, tracking and reporting requirements for the operation of Stage 1 the Facility, including the operation of the drill muds processing facility.

This WMP may require updates to remain consistent with site operations and supporting management plans. This will be undertaken in accordance with Section 10 of the OEMP where applicable.

# Attachment 1: NSW EPA Waste Levy Benchmark Requirements (2019)



## Attachment 2: Waste Tracking Register



**WASTE TRACKING REGISTER**

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