



InfraBuild

ENVIRONMENTAL MANAGEMENT PLAN

Hexham



Sparke Street, Hexham



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1 Summary of Recurring Environmental Obligations

Obligation	Frequency	By Whom	Next Due date	OEMP** Document Reference
Renewal of annual monitoring contract (currently AECOM)	Annually	Branch Manager (BM)	December 2021	-
<i>Description: outsourced environmental monitoring currently done by AECOM</i>				
Noise monitoring	Quarterly	AECOM – data available to BM	AECOM contract renewal December 2021	S10.1 and Appendix 5
<i>Description: noise testing at boundary and nearest receptors (St Josephs and Shamrock)</i>				
Overpressure monitoring	Continuous	Texcel – data available to BM	Texcel contract ongoing***	S10.2
<i>Description: blast monitoring associated with shredder operations</i>				
St Josephs Noise Monitor	Continuous	Texcel – data available to BM	Texcel contract ongoing	S10.3
<i>Description: continuous noise monitor installed at a St Josephs residency</i>				
Meteorological monitoring	Continuous	AECOM – data available to BM	AECOM contract renewal December 2021	S10.4
<i>Description: collection of weather data (rain, wind, temperature) at the shredder site</i>				
Stormwater monitoring	Twice annually*	BM	September 2021	S10.5 and Appendix 4
<i>Description: routine testing of stormwater done by BM/site staff (see below)</i>				
Stack emission monitoring	Quarterly	AECOM – data available to BM	AECOM contract renewal December 2021	S10.7
<i>Description: particle monitoring from the shredder cyclone</i>				
Community Consultative Committee (CCC)	Quarterly or as agreed by CCC	BM	June 2021	S13
<i>Description: reoccurring meeting of local residents living near the shredder</i>				
Independent Environmental Audit	Every 3 years	BM	August 2023	S14.2
<i>Description: external auditor assessing compliance with consent conditions</i>				
Annual Environmental Monitoring Report	Annually	AECOM	AECOM contract renewal December 2021	S15.1
<i>Description: annual review of monitoring data supplied to Planning NSW</i>				
Monthly EPA Waste Reports	Monthly	BM	End of month	S15.2
<i>Description: monthly tonnage reports supplied to the NSW EPA</i>				

*obligation subject to confirmation by NSW EPA via license amendment

**OEMP dated April 2021 submitted to DPIE

***Texcel National Contract managed by Head Office



2 Operation Environmental Management Plan

2.1 Purpose

Site Management shall use the Operation Environmental Management Plan (OEMP), and their Employees, Contractors and Subcontractors whom are required to carry out on-site work related to the Shredder Plant Operation.

The purpose of this plan is to define strategies, responsibilities, requirements and procedures that will ensure compliance with Legislated Requirements and Consent Authorities conditions regarding Environmental Performance of Shredder Plant Operations.

The plan provides for the identification of high-risk tasks and the control of associated risk at each stage of the Shredder Mill Operation process by both Recycling Personnel and their Contractors.

2.2 Objectives

The objectives of the Operation Environmental Management Plan are to:

- Ensure that operation of the facility is performed and maintained to meet or exceed the requirements of relevant Environmental Legislation and operating conditions as determined by Consent Authorities
- Facilitate and maintain effective lines of consultation regarding Environmental Performance issues between Operations Management, Contract Personnel, Consent Authorities and the Community
- Minimise any adverse environmental impacts associated with operation of the development
- Provide for on-going environmental management of the development
- Provide for regular monitoring and reporting of Operation Environmental Performance of the development

2.3 Scope

The Plan applies to the Recycling Metal Shredding Facility located at Sparke Street, Hexham, NSW.

3 GFG Alliance Environmental Policy

The Recycling Metal Shredder Facility at Hexham is committed to ensuring its business operates in an environmentally responsible manner having regard to all stakeholders' interests.

The environmental policy endorsed by GFG Alliance can be found at **Appendix 1** of this document.

4 General Standards

4.1 Legislation and Consent Authority Conditions

- The Protection of the Environment Operations Act 1997
- Protection of the Environment Operations (Waste) Regulation 2014
- Determination of a Development Application DA No. 345-7-2003-i, lodged with the Department of Infrastructure, Planning and Natural Resources on 25th July 2003. Version – MOD-49-3-2005-i- approved 17 May 2005 (the "DPIE Consent")



- Environment Protection Authority – Environment Protection Licence # 5345 and updated from time to time. [Online: <https://apps.epa.nsw.gov.au/prpoeoapp/>]
- Work Health & Safety Act 2011
- Work Health & Safety Regulations 2017

4.2 Infrabuild Recycling WHSE Management System

Recycling has several workplace health and safety procedures which support this Operational Environmental Management Plan:

- PRO001 - Responsibilities, Authorities and Accountability Procedure
- PRO008 - Inspection, Testing and Monitoring Procedure
- PRO018 - Incoming Scrap Deliveries Procedure
- PRO019 - Lead Acid Batteries Procedure
- PRO021 - Stockpile Management Procedure
- PRO035 - Hazardous Chemicals Procedure
- PRO045 - Asbestos Management Procedure
- PRO051 - Radiation Detection and Management Procedure
- PRO056 - Unacceptable Scrap Manual
- PRO057 - Waste Management Procedure
- PRO071 - Scrap Car Acceptance Policy

Copies of these documents and any other relevant forms can be accessed from the internal Recycling Intranet page and are accessible by Operations Management.

4.3 Site-Specific Management Plans that support this OEMP

Recycling has several site-specific operational procedures which support this Operational Environmental Management Plan:

- Hexham Traffic Management Plan (HEX-OPS-PC-SOP-602) - includes requirements that address Consent Condition 7.5b (Transport Management Plan) and associated Driver Induction Requirements (Do's and Don'ts);
- Hexham Emergency Response Plan (HEX-OHSE-RM-TOOL-601) – includes requirements that address Consent Condition 7.5c (Flood Emergency Management Plan) and Site Management & Emergency Contact Details;
- Surface Water Mitigation and Monitoring Plan, AECOM 22 December 2020 outlines details of stormwater infrastructure and constitutes a Stormwater Management Plan for the purposes of Consent Condition 7.5d.

The following Management Plans form part of the OEMP and included as appendixes.

- Appendix 2 - Waste Management Plan (Consent Condition 7.5f)
- Appendix 3 - Landscape Management Plan (Consent Condition 7.5e)
- Appendix 4 - Stormwater Sampling Locations and Analytes (Consent Condition 7.5d)
- Appendix 5 - Noise Management Plan (Consent Condition 7.5a)

5 Definitions





- Environmental Representative (ER) - A person duly appointed by Recycling Management to represent their interests during the operation of the development.
- Authorised Officer - A person duly appointed by the Consent Authority or Government Department to represent their interests during the operation of the development.
- DPIE - NSW Department of Planning, Industry and Environment.
- EPA - NSW Environmental Protection Agency

6 Operational Roles & Responsibilities

Within the Recycling WHSE Management System, Procedure 001, Responsibilities, Authorities and Accountability Procedure outlines the Operation Roles and Responsibilities for each level of the organisation. Also, salaried employees hold a position description outlining their responsibilities. Site-specific responsibilities for Hexham personnel over and above the obligations outlined in PRO001 are outlined below.

6.1 Operations Management

- Management shall ensure to its best endeavours that the operation of the Metal Shredding Facility does not impact adversely on the environment.
- Management will ensure that all operational personnel know and understand their relevant responsibilities within the OEMP.
- Management will ensure that Metal Shredding Facility operations comply with all Relevant Legislation and Consent Authority licences and conditions of operation.
- Management will ensure as a matter of Policy that it's Metal Shredding Facility operations environmental performance is monitored periodically, reviewed and improved where appropriate.
- Management will ensure that effective arrangements for community consultation and complaints handling procedures are maintained during operation of the facility.

6.2 Operations Employees

- Employees will comply with the requirements of the OEMP.
- Employees must co-operate with Management to enable compliance with all Relevant Legislation and Consent Authority licences and conditions of operation.

Without limiting the generality of the foregoing, an employee contravenes the above if he/she;

- Fails to comply, so far as the Employee is reasonably able, with instructions given by Management.
- Fails to properly use such protective clothing and equipment as is provided or provided for, by the employer in a way the employee has been properly instructed to use it;
- Misuses or damages any equipment provided in the interests of Environmental Protection.
- Fails to report to Management any situation at the workplace that the employee has reason to believe could constitute a hazard to the environment and which the employee cannot correct.
- Fails to report to Management any injury or harm caused to the environment of which, the employee is aware of that arises during, or in connection with the employee's work.



6.3 Supervision

- Operation Management will ensure by way of inspections and audits that the Metal Shredding Facility operates in accordance with the requirements of the OEMP.
- Operations Management will provide to their Employees and Subcontractors under their control any such information, instruction, training and supervision as is necessary to enable them to perform their work in a safe and efficient manner and ensure that they are not exposed to risk or present a risk of harm to the environment.
- Operations Management must ensure that there is an adequate and reliable procedure and means of communication between an Employee or Subcontractor and the person supervising the Employee or Subcontractor.

7 Operational Conditions

7.1 Hours of Operation – Shredder

The shredder must only be operated between the hours of 0700 and 1800 Monday to Saturday, and at no time on Sundays and Public Holidays, except, where the following requirements are complied with the shredder may be operated between the hours of 1800 and 2200, Monday to Friday:

- an unplanned and unforeseeable situation arises at the premises by which the operation of the NSW re-melt steel industry is at risk of being negatively impacted by a shortage of shredded scrap, and
- Operations Management informs the EPA Hunter Office, and all affected noise receptors within a 1.5Km radius of the shredder, in writing at least 24 hours prior to commencing out of hours operation, and
- an officer appointed by Operations Management is on site, solely for ensuring compliance with noise limits at various locations.

Note “All noise receptors within 1.5 Km of the shredder” is currently limited to:

- The notice boards of Saint Joseph’s Retirement Village, Hexham.
- The residences on Old Maitland Road, west of Saint Joseph’s Retirement Village.
- The residences on Pacific Highway and intersecting streets, Hexham between Ironbark Creek and No 59 Pacific Highway, Hexham.

7.2 Operation Hours – Ancillary Activities

Operations Management shall only undertake activities ancillary to the operation of the metal shredder, including the operation of all associated plant, equipment and machinery, loading/unloading of materials, materials handling and ingress/egress of heavy vehicles to/from the site, between 7:00am and 10:00pm Monday to Saturday, and at no time on Sunday or Public Holidays

Notwithstanding 9.2.1 Operations Management may seek the DPIE Director-General’s approval to alter the hours of operation for ancillary activities specified under the DPIE Consent condition 4.8A. In seeking the Director-General’s approval, the Operations Management shall provide the required information as specified in the DPIE Consent Conditions.

8 Transport Conditions

Site transport arrangements are governed by the Hexham Traffic Management Plan (HEX-OPS-

PC-SOP-602) and associated Driver Induction Requirements (“Do’s and Don’ts”) addresses the requirements of Consent Condition 7.5b (Transport Management). General conditions applying to all drivers include:

- Drivers are reminded that the first part of Spark Street is a Public Street and subject to a speed limit of 50 kilometers per hour at all times.
- Drivers are expected to follow NSW road rules and respect the rights of, and be courteous to, other road users.
- Drivers must report all accidents and near miss incidents to the Traffic Controller / Operations Supervisor.

Operations Management shall regularly inspect Sparke Street and the intersection at the Pacific Highway for debris that may be associated with the operation of the Shredder Facility and arrange for its removal from trafficable pavement and road shoulders.

8.1 Purchase of Western End of Sparke St

Condition 7.5(b)(iii)-(iv) of the DPIE consent relates to tracking of mud and traffic control between the shredder yard (previously Lots 29-30 DP803794) and the HM yard (previously Lot 1 DP874409). InfraBuild Recycling purchase this property in 2011 and members of the public are no longer able to access the roadway between the two yards.

9 Noise Conditions

Operations Management shall operate and maintain the development to ensure that noise generated during the operation of the development does not exceed the noise limits specified in Table 1, at those locations and during those periods indicated.

The maximum allowable noise contributions apply under:

- wind speeds up to 3 ms⁻¹ (measured at 10 metres above ground level); and
- temperature inversion conditions up to 3oC per 100 metres.

Table 1 - Operation Noise Limits

Location	Day 7:00am to 6:00pm Monday to Saturday 8:00am to 6:00pm Sundays and Public Holidays	Evening 6:00pm to 10:00pm on any day	Night 10:00pm to 7:00am Monday to Saturday 10:00pm to 8:00am Sundays and Public Holidays	
	LAeq (15 minute)	LAeq(15 minute)	LAeq(15 minute)	LA1(1 minute)
Any residence in Shamrock Street, Hexham, affected by noise from the premises	47	48	45	55

St Joseph's Retirement Village and any associated residence in Old Maitland Road, Hexham, affected by noise from the premises	53	42	41	56
Any operating industrial premises affected by noise from the premises	70	70	70	N/A

Note: 5dB(A) shall be added to the measured level should the noise be substantially tonal or impulsive in character.

Operations Management has installed noise-monitoring equipment at the St Joseph's Catholic Care of the Aged facility, in consultation with the owners of that property, and to the satisfaction of the DPIE Director-General.

Operations Management shall operate the noise monitoring equipment on an on-going basis, as may be agreed with the St Joseph's Catholic Care of the Aged facility, to monitor noise impacts from the development on that property.

All noise monitoring data shall be made available to the St Joseph's Catholic Care of the Aged facility.

Operations Management may only cease noise monitoring in accordance with this condition, after having consulted with the St Joseph's Catholic Care of the Aged facility, and only with the agreement of the DPIE Director-General.

For the purpose of assessment of noise impacts specified under condition 4.3 of the DPIE Consent, noise from the development shall be measured within one meter of the boundary of any affected residential or industrial premises.

Existing operational Management procedures and manuals shall be updated to incorporate the new site and any new requirements. Measures shall include:

- Recycling's specific Safety Management Manual and Safety Management Procedures.
- Scrap metals containing dangerous goods shall not be accepted for processing.
- All incoming scrap feed material shall be visually inspected prior to shredding.
- Potentially explosive devices, including gas cylinders, are removed prior to shredding where possible.
- LPG gas bottles shall not be accepted for shredding – except those known to be degassed and vented from authorised suppliers.
- All potentially explosive devices, including gas cylinders, shall be disposed of in an environmentally satisfactory manner.
- The shredder mill water spray system shall be operated whenever scrap car bodies are being shredded.

10 Environmental Monitoring

10.1 Quarterly Noise Monitoring

Operations Management have appointed a consultant to carry out operation noise monitoring and compliance auditing as required by the DPIE Consent – See **Appendix 5** (Noise Management Plan).

10.2 Explosion Overpressure Monitoring

Operations Management has installed at the Eastern most boundary of the site and shall maintain and operate suitable instrumentation, in accordance with Australian Standard 2187.2-1993, to monitor and measure explosion overpressures traveling in a northerly direction towards residences at Shamrock Street and to the satisfaction of the EPA. Records of all blasts recorded shall be maintained.

10.3 St Josephs Continuous Noise Monitor

Operations Management will ensure the continuous noise monitor at St Josephs Retirement Home is operational and maintained.

10.4 Meteorological Monitoring

- Operations Management has installed and shall maintain and operate Suitable instrumentation to monitor (by sampling and obtaining results by analysis) the parameters specified in Table 2.
- Operations Management shall monitor the parameters specified in Table 2 using the specified units of measure, averaging period, frequency, and sampling method in the table.
- Records of all-weather conditions recorded shall be maintained.

Table 2 – Meteorological monitoring

Parameter	Units of Measure	Averaging Period	Frequency	Method
Rainfall	mm	1 Day	Daily	AM-4
Wind Speed @ 10m	m/s	15 minute	Continuous	AM-2 and AM-4
Wind Direction @ 10m	°	15 minute	Continuous	AM-2 and AM-4
Temperature @ 10m	°C	15 minute	Continuous	AM-4
Temperature @ 2m	°C	15 minute	Continuous	AM-4
Sigma Theta @ 10m	°	15 minute	Continuous	AM-4
Additional Requirements <ul style="list-style-type: none"> - Siting - Measurement 				AM-1 & Am-4 AM-2 and AM-4

10.5 Storm Water Quality Monitoring

Operations Management shall ensure the quality of storm water leaving the site by adhering to the Surface Water Mitigation and Monitoring Plan prepared by AECOM and dated 22 December 2020. Appendix 4 summarizes key components of the Storm Water Monitoring Plan including:

- identification of contaminants to be tested;
- monitoring frequencies; and
- location of the storm water quality monitoring.

10.6 Dust Monitoring

Operations Management shall operate and maintain the development in a manner that minimises dust emissions from the site. All activities undertaken on the site shall be carried out in a manner that minimises the generation of dust, and emissions from the site and traffic-generated dust including:

- Hardstand areas shall be regularly washed down to prevent a build-up of fine materials;
- All Vehicle traffic surfaces within the site shall be vacuum cleaned as required;
- All onsite equipment shall be maintained so that they operate efficiently to reduce emissions;

Operations management may undertake due diligence monitoring of dust emissions from time to time to evidence appropriate management of dust on site.

10.7 Stack Emission Monitoring

Operations Management has appointed a consultant to carry out all Shredder Stack Emission sampling as required by the DPIE Consent.

- All air emission stacks shall be fitted with sampling points, which comply with the Clean Air (Plant and Equipment) Regulation 1997 and Australian Standard 4323.1-1995.
- Operations Management shall operate the development to ensure that the concentrations of Total Solid Particles, lead (Pb), and mercury (Hg) discharges from the shredder plant do not exceed the limits specified in Table 3.
- Operations Management shall periodically determine the pollutant concentrations specified in Table 4, as discharged from the shredder plant employing the sampling and analysis method specified and at the frequency indicated in the table. All monitoring shall be carried out strictly in accordance with Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (EPA 2007).

Table 3 – Maximum Allowable Discharge Concentration Limits (Air)

Pollutant	Maximum Allowable Discharge Concentration Limit	Reference Conditions
Lead (Pb)	5.0mg/m ³	dry, 273K, 101.3kPa
Mercury (Hg)	1.0mg/m ³	dry, 273K, 101.3kPa
Total Solid Particles	100/m ³	dry, 273K, 101.3kPa

10.8 Monitoring Records

The results of any monitoring required by EPA Licence 5345 must be recorded and retained as set out in this condition. All records required to be kept by EPA Licence 5345 must be:

- in a legible form, or in a form that can readily be reduced to a legible form;
- kept for at least 4 years after the monitoring or event to which they relate took place; and
- produced in a legible form to any Authorised Officer of the EPA who asks to see them.

The following records must be kept in respect of any samples required to be collected for the

purposes of this licence:

- the date(s) on which the sample was taken;
- the time(s) at which the sample was collected;
- the point at which the sample was taken; and the name of the person who collected the sample.

11 Waste Management

- Operations Management shall only store, treat, process or reprocess material as outlined in the EPA Licence 5345.
- Operations Management shall ensure that an EPA Authorised Liquid Waste Disposal Company is appointed to remove all Scheduled Liquid Waste from the premises in accordance with EPA Licence 5345.
- Operations Management shall ensure that all Solid Waste Residue arising from Shredding Operations is dispatched as required to appropriately approved waste disposal facilities – See Appendix 2.
- General putrescible and solid waste generated by employees shall be collected in waste bins then transferred to skips to be collected by a registered contractor;
- Sludge and oils from the First Flush System shall be removed as required by a registered contractor.

12 Dangerous Goods Management

- Operations Management shall ensure that all chemicals, fuels and oils shall be stored in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund.
- Self-bunded containers are used across the location where required to contain possible spills.
- Hydrocarbon spill kits shall be maintained on site to manage spills.
- In the event of a major spills accident a sand bund shall be established, if necessary, upstream of the culvert beneath the Pacific Highway and the Fire Brigade Hazmat Unit and EPA notified;
- Spills occurring on Lots 1 will be captured in the First Flush Pit – If, the spill was to occur after a heavy rainfall event (a 1 in 30-year event) and the First Flush Pit was full – Trained Staff shall block the outlet of the On-Site Detention basin to contain the spill.

13 Community Consultative Committee

- Operations Management has established a Community Consultative Committee for the development to provide a forum for the discussion of the environmental performance of the development, provision of relevant data, and the receipt of community complaints and concerns.
- The Committee shall include, but not necessarily be limited to representatives from the St Joseph's Catholic Care of the Aged facility and the Shortland / Birmingham Gardens / Sandgate Residents' Action Group.
- Operations Management shall ensure that the Committee meets at least monthly during the first six months of operation of the development, after which meeting frequency shall



be by agreement between Operations Management and the Committee, and for the approval of the Director-General.

- Records of Minutes from CCC Meetings shall be maintained by Operations Management and copies shall be produced upon request from the DPIE Director-General or NSW EPA Authorised Officer

14 Auditing, Complaints Handling and Notifications

14.1 Internal Environmental Performance Auditing

- Operations Management shall ensure that regular internal audits are carried out by suitably trained and competent Company Personnel to ensure Shredder Plant Operation overall compliance with Legislation, Consent Authority and EPA Licence Conditions.
- Internal Environmental Audits are to identify any observed non-conformance so that corrective actions can be taken and where possible identify opportunities to improve Operation Environmental Performance where appropriate.
- Internal Audit Reports are to be included in the Monthly Environmental Report to Company Executive Management.

14.2 Independent Environmental Auditing

- As may be directed by the Director-General, the Applicant shall commission an independent person or team to undertake an Environmental Audit of the development. The independent person or team shall be approved by the Director-General prior to the commencement of the Audit. The Audit shall:
 - be carried out in accordance with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing;
 - assess compliance with the requirements of this consent, and other licences and approvals that apply to the development;
 - assess the environmental performance of the development against the predictions made and conclusions drawn in the documents referred to under condition 1.2 of this consent; and
 - review the effectiveness of the environmental management of the development, including any environmental impact mitigation works.
- An Environmental Audit Report shall be submitted to the Director-General within two months of the completion of the Audit, detailing the findings and recommendations of the Audit and including a detailed response from the Applicant to any of the recommendations contained in the Report.

14.3 Notification of Environmental Incidents / Near Miss Events

- In the event of an environmental emergency such as a fuel spill or other emission exceeding regulatory requirements, the employees that caused it, or those closest to the location, will take all reasonable steps to stop, control and contain the pollutant so as to minimise its impact on the environment.
- Operations Management will provide Employees and Contractors/Subcontractors with the Recycling procedure for the internal reporting of Environmental incidents/near misses/serious occurrences. Employees and Contractors/Subcontractors shall use this procedure and forms when notifying Operations Management of Environmental



accidents/near misses/serious occurrences and incidents.

- Employees and Contractor/Subcontractor must report any Environmental near miss or serious occurrence to Operations Management or the Environmental Representative, as soon as reasonably practical.
- Employees and Contractor/Subcontractor must supply any information regarding the Environmental incident to Operations Management or the Environmental Representative.
- Operations Management shall report all incidents of harm to the environment to the following authorities:
 - Environment Protection Authority of NSW in accordance with EPA licence conditions
 - The Director-General of DPIE (refer DPIE Consent Conditions 44.3 through to 44.5 - Reporting of Environmental Incidents).

14.4 Recording of Pollution Complaints

Operation Management, throughout the life of the development have made available the following Community Complaint Facilities:

- a 24-hour telephone number (02 4961 9700) on which complaints about the development may be registered;
- a postal address (PO Box 329 Liverpool, NSW 2170) to which written complaints may be sent; and
- an email address (lesley.harpeng@infrabuild.com) to which electronic complaints may be transmitted.

These details shall also be provided on the Infrabuild internet site. The telephone number, the postal address and the email address shall be maintained throughout the life of the development.

Operations Management must keep a legible record of all complaints made to Management or any employee or agent of the Management in relation to pollution arising from any activity to which EPA Licence 5345 applies.

The record must include details of the following:

- 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;
- and if no action was taken by the licensee, the reasons why no action was taken.

The record of a complaint must be kept for at least 4 years after the complaint was made and must be produced to the DPIE Director-General or any Authorised Officer of the NSW EPA who asks to see them.

14.5 Notification of EPA and DPIE of any change to Environmental Representative

NSW EPA will be notified of any change of Environmental Representative within 14 days of the change. The Environmental Representative is listed in the Hexham Emergency Response Plan (HEX-OHSE-RM-TOOL-601). The notification should be marked attention to the Newcastle office of the NSW EPA: waste.operations@epa.nsw.gov.au and the DPIE general email: information@planning.nsw.gov.au. Note that it is not expected that a change to the Environmental Representative does not trigger the requirement for a resubmission of this OEMP to DPIE.

15 Performance Reviews

15.1 Preparation of Annual Environmental Management Report (AEMR)

The requirement to prepare and submit an AEMR is contained in Consent Condition 8.3. The AEMR is due within 3 months of the EPL anniversary, being 18 March of every year. The AEMR should be submitted to DPIE via the Major Projects planning portal website: <https://www.planningportal.nsw.gov.au/major-projects> and a copy sent to Newcastle City Council at: mail@ncc.nsw.gov.au.

15.2 NSW EPA Monthly Waste and Annual Shredder Floc Reports

Operations Management will submit Monthly Waste Reports to the NSW EPA in accordance with the licence conditions R4.1 and R4.2.

Appendix 1 – GFG Alliance Environmental Policy

GFG Alliance Australia

Environment Policy



GFG Alliance Australia's primary operations include mining, metal recycling, steelmaking, the manufacture of intermediate and finished steel products, and the distribution and sale of metal and mineral products.

We seek to improve business sustainability by valuing environmental, social and economic considerations in our decision-making.

We are committed to pursuing a high standard of environmental management throughout our operations and strive for continual improvement of environmental performance, the efficient use of resources, and the minimisation or prevention of pollution.

Specifically, it is our policy to:

- Establish, review, document and monitor measurable environmental objectives and targets to continually improve environmental performance whilst taking into account evolving community expectations, management practices, scientific knowledge, technology and business structure.
- Use energy, fresh water and other resources more efficiently, including an emphasis on local scrap metal recovery and recycling. Use green, renewable long term sources of power where possible. Promote and improve the environmental credentials of GFG Alliance Australia, our operations, our products and their application.
- Comply with applicable environmental laws, regulations and mandatory standards. Where these do not exist, apply appropriate internal standards that reflect our commitment to prevent or minimise adverse environmental impacts resulting from our operations, products and services.
- Communicate on environmental issues with relevant governments and communities directly affected by our operations, and contribute to the development of policies, legislations and regulations that may affect GFG Alliance Australia operations.
- Control and manage environmental risks arising from our operations by implementing systems to identify, assess, control, and monitor those environmental risks.
- Educate and appropriately train workers and contractors to assist with GFG Alliance Australia's understanding of environmental standards and assignment of appropriate accountabilities and responsibilities to those individuals.
- Inform relevant workers, contractors and suppliers of goods and services to GFG Alliance Australia managed sites of their obligations regarding this policy, to manage policy implementation, facilitate stakeholder understanding and be committed to continual policy maintenance and improvement.

Sanjeev Gupta
Executive Chairman
November 2017

www.gfgalliance.com

Version No: 8 | Issued 1.11.2017 | Authorised by GFG Alliance Australia OHSE Council | Intranet version is the only controlled version

Appendix 2 – Waste Management Plan

Aim

- To minimise any detrimental effect of Shredder Operations Waste on the surrounding Environment
- To monitor generated wastes and review effectiveness of actions and measures utilized to control them

Scope

Applicable to all wastes generated from the operation of the Shredding Facility.

Identification of Wastes

Flock – Non-Metallic Solid Shredder Residue

Flock material usually consists of non-metallic material such as foam, electrical components, plastics, rubber, dirt and residues left after the mechanical shredding of car bodies, steel sheets and miscellaneous items.

The Hexham shredding facility has multiple screening processes, mechanical and electrical to recover most metallic parts from generated flock.

Independent analysis of flock has determined a Solid Waste classification.

Control Measures for Ensuring Compliance

- Flock shall be stored in walled bunkers (open at 1 side) until dispatched by truck to EPA Licensed Landfills.
- Trucks taking Flock from Hexham Shredder shall ensure that the load is suitably covered to prevent spills of Flock en-route.
- Operations Management shall ensure that Flock is only dispatched to suitably EPA Licensed Landfill Operators
- Operations Management in accordance with EPA Licence 5435 shall where practicable, implement appropriate procedures to ensure that all scrap, dust and litter is contained within the designated receival and load out areas.
- Operations Supervision shall monitor the Flock storage area and take appropriate action to ensure that Flock does not migrate to other areas on site – especially during adverse weather conditions such as high wind.
- Operations Supervision shall ensure that Flock storage and removal operations do not generate and cause dust to migrate off site.
- Flock storage and environmental impact shall be included in Internal Environmental Audits conducted by Company WHSE Officers and reviewed by Operations and Executive Management.
- Operations Management shall keep Monthly Flock Generation and Dispatch Statistics and shall review the effectiveness of Flock control measures and improve such measures where appropriate.

Waste Oil / Water, Hydrocarbons / Water Mixtures & Emulsions

Waste oil / water, hydrocarbons / water mixtures and emulsions arise from the de-lousing of un-compacted motor vehicles.

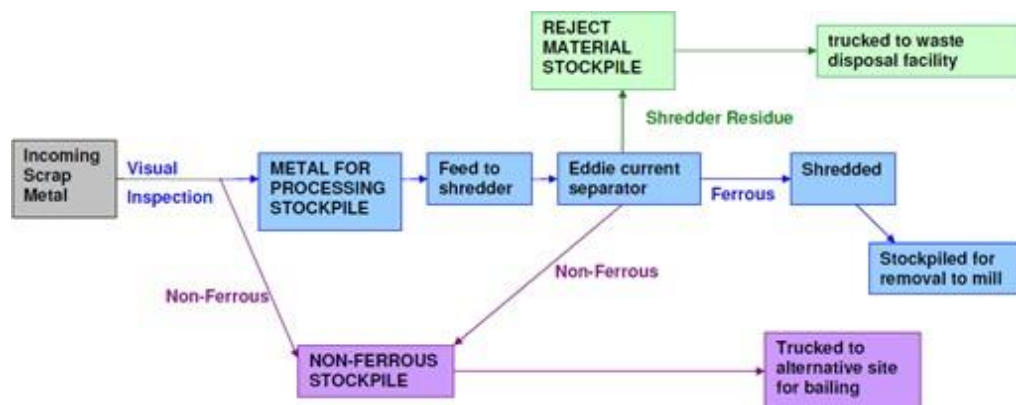
Un-compacted motor vehicles delivered to site usually result from dumped derelict vehicles being recovered from environmentally sensitive areas, Council arranged pickups and the General Public responsibly disposing of such vehicles.

Quantities of this category of waste is difficult to estimate due to the varying conditions of un-compacted cars presented – Statistical analysis of such waste recovered, and dispatched post operation of the Shredding Facility will provide an accurate figure.

Control Measures for Ensuring Compliance

- Operations Management shall ensure that all scrap motor vehicles delivered to the Hexham Shredding Facility from Company controlled sources have been compacted and/or de-loused of fluids.
- Operations Management / Supervision shall review scrap motor vehicle deliveries from Company controlled sources and, should vehicles be found to contain fluids, take appropriate action to ensure future deliveries conform.
- Operations Supervision shall perform inspections of the designated scrap vehicle area and take appropriate action should any evidence of fluid migration from the bunding be detected.
- Operations Supervision shall monitor quantities of motor vehicle fluids stored and shall arrange disposal through an accredited provider of such service.
- Operations Supervision will ensure that levels of stored scrap motor vehicle fluids are kept to minimal levels especially in times of inclement weather or impending flood.

Operations Management shall monitor compliance to the Waste Management Plan and DISCIPLINARY ACTION up to and including cancellation of employment and work contracts will be instigated against Company Personnel or Service Providers found not to be complying with the Waste Management Plan.



Appendix 3 – Landscape Management Plan

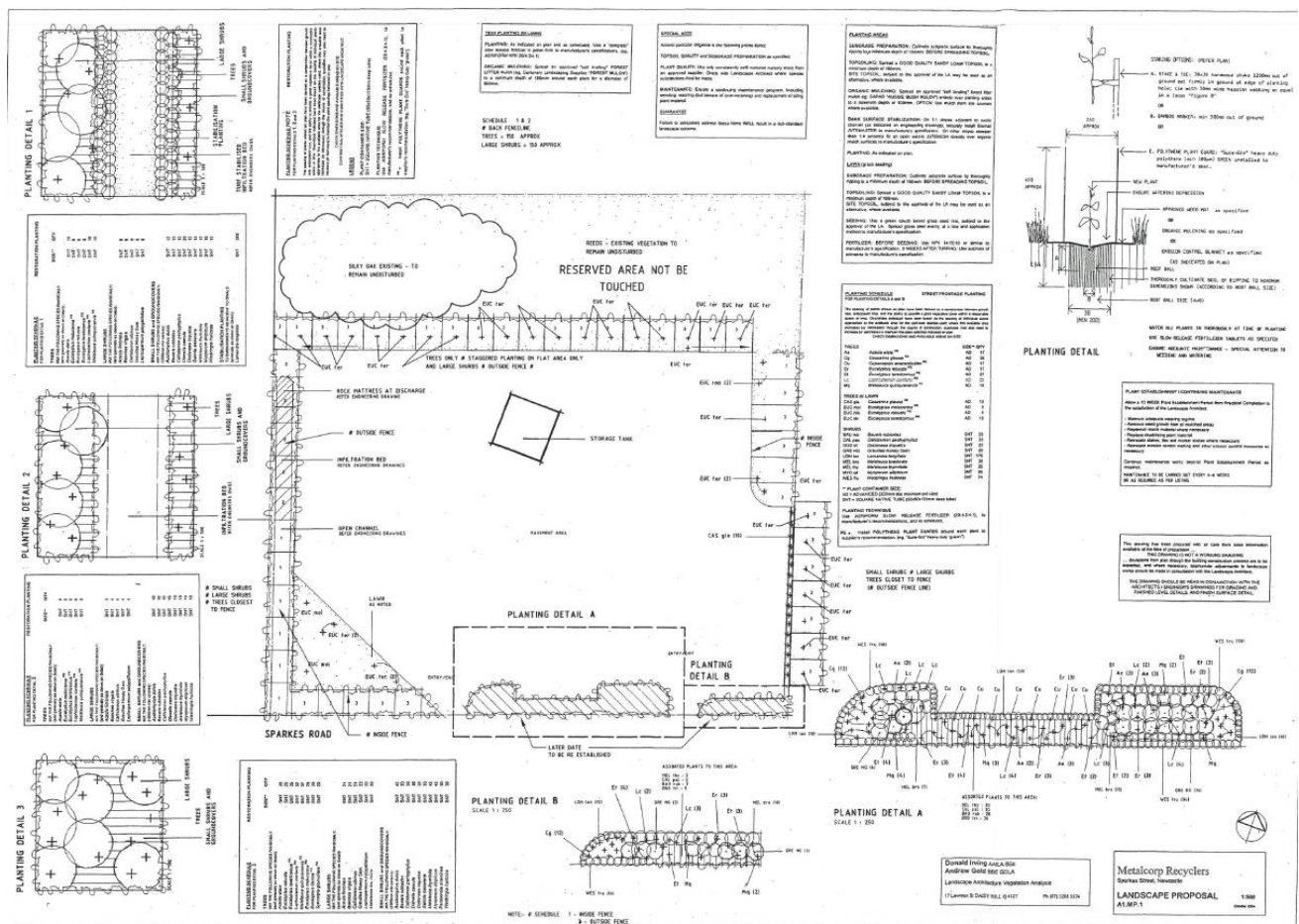
Aim

- To mitigate any adverse effect of the development on the visual amenity of the surrounding area – Specifically the Pacific Highway, Ironbark Creek, residential receptors and the railway line.
- To install and maintain Landscaping for the full life of the development around all boundaries of the development maximizing the use of flora species endemic to the locality and suited to local soil conditions in accordance with the Landscape Plan.
- To maintain and improve where practicable the existing vegetation on all boundaries of the development.

Scope

The Hexham Shredding Facility located Lot 1 DP1176316 - Sparke Street Hexham NSW 2322.

Approved Landscape Plan



Planning for Bushfire Protection

- The Company has assessed the development site regarding attack by bushfire in accordance with Appendix 3 of The Planning for Bushfire Protection (NSW Rural Fire Service and Planning NSW, 2018).
- The development is sited on flat terrain with distances from classified vegetation



indicating a LOW risk Category of Bushfire Attack.

- The Company has trained emergency personnel who are competent in Fire Response to deal with any fire emergency.

Landscape Maintenance Schedule

The Company has commissioned a professional landscaper to ensure that all landscaped areas on the site are maintained in a tidy, healthy state and free of weed species.

Garden maintenance to be carried out every 4 to 6 weeks or as required maintaining the original standard:

- Maintain adequate watering where required.
- Prune shrubs and trees as required.
- Replace dead or dying plants with Landscape Plan approved species.
- Remove weed growth from mulched areas.
- Roundup unwanted weed growth along fence lines.
- Replenish mulch where necessary
- Keep mulch clear from collar of shrubs.
- Reinstated stakes, ties and polythene plant guards as required
- Repair erosion control where necessary.
- Remove windblown debris from garden areas.

Lawn maintenance to be carried out;

- Fortnightly – September through March, and
- Monthly – April through August, or
- As required maintaining the original standard.
- Mowing all grassed areas.
- Trimming along fence lines.
- Trimming edges on gutters and driveways
- Roundup unwanted weed growth along fence lines
- Remove windblown debris from grassed areas
- Blowing of driveways and gutters.

Riparian Zone – Boundary of Heavy Metal Yard and Ironbark Creek

Established vegetation between the boundary of Lot 1 and Ironbark Creek will not be disturbed.

Pacific Highway

Vegetation along the Pacific Highway will be inspected at 4-to-6-week intervals to ensure that it is effectively managed to maintain 180 metre vehicle sight distances for vehicles exiting Sparke Street onto the Pacific Highway in accordance with RTA requirements.



Appendix 4 – Stormwater Sampling

Surface water sampling is proposed to be completed during every discharge events only on a biannual basis at the following locations:




FIGURE 9: PROPOSED SAMPLING LOCATIONS


AECOM



Chain of Custody Form

Operational Environmental Management Plan

 <p>SGS Environmental Services Unit 16, 33 Maddox Street Alexandria NSW 2015 Telephone No: (02) 85940400 Facsimile No: (02) 85940499 Email: au.samplerreceipt.sydney@sgs.com</p>		<h2 style="text-align: center;">CHAIN OF CUSTODY & ANALYSIS REQUEST</h2>														Page __ 1 of __ 1							
		Company: <u>InfraBuild Recycling</u> Address: <u>14 Sparke St Hexham 2322</u> Contact Name: <u>Paul Smith</u> Mobile: <u>0417 596 149</u>				Project Name/No: <u>Hexham</u> Purchase Order No: <u>Quote #6227257</u> Results Required By: <u>Routine</u> Telephone: <u>02-4961-9705</u> Facsimile: _____ Email Results: <u>paul.smith@infrabuild.com</u>																	
Client Sample ID	Date Sampled	Lab Sample ID	WATER	SOIL	PRESERVATIVE	NO OF CONTAINERS	CL7 Dissolved & total	WQ3	AN10	TSS	Turbidity	Oil and Grease											
			SW02B – Shredder	X			6	x	x	x	x	x	x										
			SW03B – Sed Trap	X			6	x	x	x	x	x	x										
			SW05B – NF Geotextile	X			6	x	x	x	x	x	x										
			SW06 – Creek	X			6	x	x	x	x	x	x										
Relinquished By: Paul Smith			Date/Time:						Received By:				Date/Time										
Relinquished By:			Date/Time:						Received By:				Date/Time										
Samples Intact: Yes/ No			Temperature: Ambient / Chilled						Sample Cooler Sealed: Yes/ No				Laboratory Quotation No:										
			Comments: Ring SGS on 02 85940400 for sample pickup																				

Appendix 5 – Noise Management Plan

Background

The Recycling site at Hexham NSW ('the Site') has operated in some form since 1994. In 2004 the site underwent a major expansion and upgrade, including the commissioning of a new shredder. The development consent for this was development approval number DA 345-7-2003-i. This DA includes specific requirements for the management of noise, including the creation of a Noise Management Plan. Since 2004 there have been various regulatory, organisational and operational changes and the Noise Management Plan has now been revised in response to those changes. In addition, in 2017 there was a review of the effectiveness of the previous noise monitoring program. The results of this review have also been incorporated into this revised Noise Management Plan.

Aim and Scope

The aim of the Hexham Noise Management Plan is to provide the information and direction needed to ensure operational compliance with the noise related conditions of the development approval for the Site (DA 345-7-2003-i).

DA 345-7-2003-i strictly only applies to the portion of the site on which the shredder is located (the Western side of Sparke St). However, this Noise Management Plan applies to the entire Recycling operation at Hexham, i.e. sites on both sides of Sparke St.

Potential Sources and Controls

Potential Noise Sources	Controls
Normal operations	<ul style="list-style-type: none"> Limits to operating hours Initial selection of equipment that is compliant Equipment maintenance to avoid increasing operational noise Noise monitoring program for early warning of exceedances
Overpressure events (i.e. explosions within the shredder)	<ul style="list-style-type: none"> Limits to operating hours Strict controls to prevent prohibited items (e.g. gas cylinders) from entering the scrap stream Refer to Site Acceptance Criteria for more information
Traffic noise	<ul style="list-style-type: none"> Limits on the number, time and route of truck movements Refer to Traffic Management Plan for more information

Noise Monitoring Program

Noise monitoring has been undertaken at the site since 2004. In 2017 there was a review of the monitoring process and the results of that process. This review showed that the site consistently complied with the applicable noise limits, although there were opportunities for rationalization and improvement in the noise monitoring program. The 2017 version of the noise monitoring program has been developed in response to the findings of the 2017 review.

A key finding in the review was that there had been a gradual but significant increase in background noise levels since the commencement of the program. As a result, it was often not possible to determine if the site was compliant or not when noise was recorded close to the receptors. In response the noise monitoring consultants adopted an alternative methodology in which they measured noise on the site boundary and then used established industry techniques to model a predicted noise level at the receptors. This method is acceptable under the NSW Industrial Noise Policy (2000). This approach has now been permanently adopted within the noise monitoring program.

Noise Monitoring Limits and Locations

The applicable noise limits, as recorded at specific receptor locations, are provided in the table below. This information is taken directly from DA 345-7-2003-i and EPA Licence 5345.

Applicable noise limits

Location	Day dB(A) LAeq (15 min)	Evening dB(A) LAeq (15 min)	Night dB(A) LAeq (15 min)
Shamrock St	47	48	45
Calvary St (St Joseph's Retirement Village)	53	42	41
Operating industrial premises	70	70	70

Noise Monitoring Frequency and Methodology

- The noise monitoring program is a routine ongoing operational activity and should be planned for as such
- It is conducted by an external professional organisation qualified to undertake such activity
- Monitoring events occur 4 times a year (Every Quarter)
- Monitoring consists of attended monitoring on the site boundary at location(s) which allow for the calculation of predicted noise levels at the receptors nominated in the table above, namely Shamrock Street and Calvary Street
- The measured boundary results are used to calculate predicted levels at receptors using established industry methods
- A report is produced for each monitoring round (i.e. Four reports per year)
- The methodology used is described in the report of each round of measurement
- The report for each monitoring round is reviewed internally as soon as it is available



- In the event that a noise exceedance is recorded this will be immediately investigated and addressed
- The applicable noise limits for monitoring and reporting are those contained within DA 345-7-2003-i and also EPA Licence 5345. The limits in both of these documents are the same
- The combined annual results of noise monitoring are provided to DPIE on an annual basis in the form of an Annual Environmental Management Report

