



Prestons Waste Treatment Facility

9-13 Whyalla Place, Prestons, NSW 2170

**Operational Environmental Management
Plan**

Document Control

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Glossary

Term	Definition
AQIA	Air Quality Impact Assessment
ASS	Acid sulfate soils
CA	consignment authorisation
CCO	Chemical Control Orders
CLM Act	Contaminated Land Management Act 1997
DAF	Dissolved air flotation (DAF)
DCP	Development Control Plan
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement
EMS	Environmental Management System (EMS)
EP&A Act	Environmental Planning and Assessment Act 1979
EPL	Environmental protection licence
GLCs	Ground Level Concentrations
Hi-Quality	Hi-Quality Waste Treatment Services Pty Ltd
HVAC	Heating, ventilation air conditioning
NAPL	Non-aqueous phase liquid
NEPM	National Environment Protection Measure
OAQMP	operational Air Quality Management Plan
OEMP	Operation Environmental Management Plan
OVNMP	Noise and Vibration Management Plan
PAH	Polycyclic aromatic hydrocarbons
POEO Act	Protection of the Environment Operations Act 1997
PFAS	Per- and poly-fluoroalkyl substances
PIRMP	Pollution Incident Response Management Plan ()
RtS	Response to Submissions
SSD	State Significant Development
The Site	9-13 Whyalla Place, Prestons NSW
TCE	Trichlorethylene

Term	Definition
Tpa	Tonnes per annum
TSP	Total suspended particulates
TPH	Total petroleum hydrocarbons
TWA	Trade waste agreement
VOC	Volatile organic compounds
WARR Act	<i>Waste and Resource Recovery Act 2001</i>
WHS	Work health and safety
WMA	<i>Water Management Act 2000</i>
WTF	Waste Treatment Facility

1 Introduction

1.1 Overview

Hi-Quality Waste Treatment Services Pty Ltd (Hi-Quality) has submitted a State Significant Development application (SSD 9346594) for the construction and operation of a Waste Treatment Facility (WTF) at 9-13 Whyalla Place, Prestons NSW (the Site) in accordance with Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act.). The Prestons Waste Treatment Facility is wholly owned by the Hi-Quality. (Refer to **Figure 1-1**)

Hi-Quality is seeking approval to optimise the existing site for the purpose of processing and treating contaminated soils, sludges and liquid wastes to a level suitable for reuse or disposal to a landfill or sewer, with a throughput capacity of up to 270,000 tonnes per annum (tpa). The Project aims to expand the existing warehouse to a total floor area of about 6,400 m² (an increase of 1,300 m²). This will be achieved through partial demolition of one external wall.

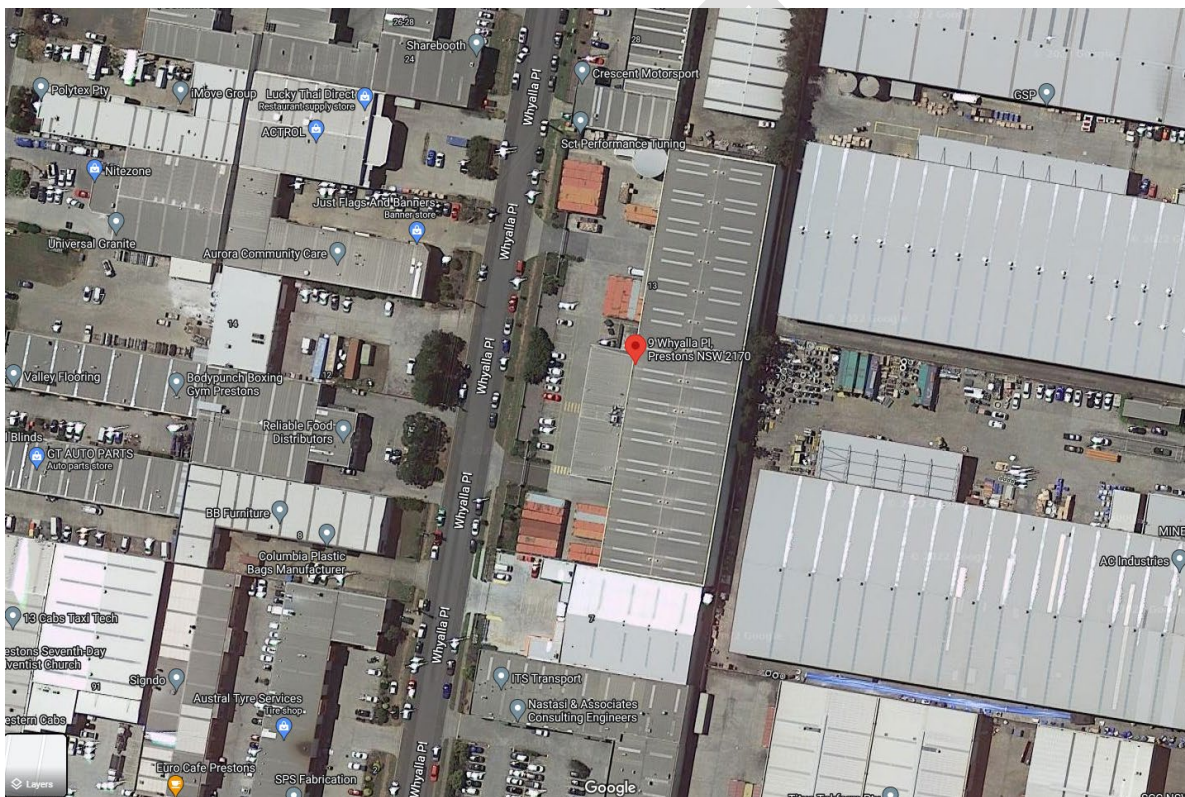


Figure 1-1: Project site (Source: Google Maps)

This Operational Environmental Management Plan (OEMP) has been prepared to support the Response to Submission Report (RTS) and will be the main documentation to guide the environmental management at the Prestons WTF during operation.

The management strategies and control measures detailed within the OEMP will be reviewed annually and updated, where necessary, to reflect changes introduced by the Hi-Quality Group operational team, site specific outcomes, non-conformances and recommendations arising out of inspections, meetings and audits.

1.2 Scope and Objectives

The OEMP provides the framework and guidance for the site activities to be conducted in a manner whereby appropriate control measures are implemented to minimise the potential for adverse impacts on the environment and to meet compliance requirements of the approvals and licences.

The objectives of this OEMP are to:

- Provide an overview of the WTF (refer to the Site Layout Plan in Appendix A)
- Describe the relevant legislation, policies, guidelines and standards which apply to the operation of the WTF and which influence the environmental management principles and procedures to be used on the Site
- Identify key environmental management issues relating to the operation of the WTF
- Provide a means of implementing appropriate mitigation measures for the key environmental issues (refer to the individual sub-plans in the Appendices)[*Determined by the Conditions but likely to include traffic, noise, waste, water and air quality management plans*]
- Provide a working environmental management tool to follow during the operation of the WTF
- Define roles and responsibilities of the WTF
- Provide a guide for the interaction with relevant government authorities and other relevant stakeholders, including the community, during the operation of the WTF
- Provide standard operating procedures for the management of the WTF and key environmental issues
- Provide a basis for monitoring, reporting and maintaining compliance.

This OEMP and associated sub-plans have been prepared to provide the management measures to be implemented to minimise potential adverse impacts on the environment during the operation of the WTF.

1.3 Supporting Environmental Management Plans

A series of supporting environmental management plans will be developed to support this OEMP. These plans are provided as Appendices to this OEMP and are as follows:

[*Determined by the Conditions but likely to include traffic, noise, waste, water and air quality management plans*]

- Operational Traffic Management Plan (*Preliminary OTMP provided*, refer to Appendix E)
- Operational Noise and Vibration Management Plan (to be developed, if required, prior to commencement of operations)
- Operational Air Quality Management Plan (to be developed, if required, prior to commencement of operations)
- Waste Management and Monitoring Plan (to be developed, if required, prior to commencement of operations)
- Operational Water Management Plan (to be developed, if required, prior to commencement of operations).

1.4 The Proponent

Hi-Quality Waste Treatment Services Pty Ltd is a subsidiary of Hi-Quality Group. The Hi-Quality Group is a proudly Australian owned and operated family business and specialises in:

- Transport and logistics
- Quarrying
- Resource recovery and recycling
- Concrete batching and manufacturing
- Waste management and landfill
- Waste treatment services
- Building and Landscaping product supplies
- Property development.

The Hi-Quality Group operations are located in NSW, ACT, Victoria and Queensland.

1.5 Document Structure

The structure of this OEMP is as follows:

- **Section 1 – Introduction:** Provides a brief overview of the WTF and outlines the scope and objectives of the OEMP.
- **Section 2 – Facility Overview and Operation:** Provides a description of the WTF and provides details of the processing and management of waste received.
- **Section 2.8 – Statutory Requirements:** Outlines the statutory requirements and obligations which need to be fulfilled during operation of the WTF.
- **Section 4 – Environmental Management:** Describes the roles and responsibilities for employees involved in the operation of the WTF. This section also outlines relevant training and inductions requirements so that employees are aware of their environmental obligations, and complaint and incident management and emergency response.
- **Section 5 – Implementation:** Details the implementation of managing environmental risk of the different environmental aspects during operation of WTF.
- **Section 5.10 – Non-Conformances, Corrective and Preventive Actions:** Details the monitoring of environmental risks through environmental reporting, auditing, and how environmental incidences and non-conformance are managed during the operation of the WTF.

1.6 Consultation

If required by the Conditions of Consent, this section will be updated to detail any of the required consultation.

The OEMP will be required to be approved by the Department of Planning and Environment (DPE) prior to operations commencing.

2 Facility Overview and Operation

2.1 Site Overview

The Site is located in an existing IN3 Heavy industrial Zone. The nearest commercial receivers are located 350 m to the west of the Site at the Mercure Sydney Liverpool Hotel and The Potter's House Christian Church. The nearest residential receivers are located at 301 Hoxton Park Road, about 450 m north of the Site.

Access to the Site is from Hoxton Park Road, Liverpool into Whyalla Place. The surrounding arterial roads include the M7 Motorway to the west and Hume Highway to the east.

The Site is approximately 9,100 m² and currently supports a warehouse building (~4,097 m²). Once upgraded the Site will feature:

- An enclosed warehouse with a total floor area of to a total of 6,400 m² for unloading and handling of waste, with environmental controls including an air extraction system
- A self-contained Dewatering and Drill Mud Plant is contained within 1 x 20 ft container.
- An office building with office space and amenities for workers
- Three weighbridges facilitating a single-direction heavy vehicle flow of traffic
- Two 8-metre-wide driveways to Whyalla Road for use by heavy vehicles and a third driveway for light vehicles, allowing for direct access to the carpark, separated from heavy vehicles.

The Site will house the Hi-Quality Group head office within the office space on Site.

2.2 Wastes accepted and treated on site

The WTF would utilise technologies aimed at treating waste to a level suitable for reuse, disposal to landfill or disposal to sewer. The project would process up to 270,000 tonnes of waste per annum including:

- Packaged Waste (Liquid and Solid)
- Sediments and sludges, including:
 - Contaminated soils
 - Acid sulfate soil
 - Sludges
- Drill muds (non-contaminated); and
- Liquid wastes.

Source material would primarily be generated from industrial processes and contaminated sites.

2.2.1 Treatable waste categories

Wastes that are considered treatable at the WTF, have been divided into four specific wastes categories based on the anthropogenic substances contained within the waste.

Table 2-1 summarises the wastes (solid / sludge / liquid) that can be accepted by the WTF and the likely primary and secondary treatment technologies.



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Table 2-1: Summary of waste and proposed treatment

Category	Contaminant Group	Description	Primary Treatment Technology	Secondary Treatment Technology
A	Organics	Wastes containing volatile and semi volatile substances, petroleum, hydrocarbons, mineral oils, coal tar impacted materials, refinery wastes, biodegradable (aerobic) materials.	Bioremediation	Chemical oxidation/immobilisation
B	Halogenated Hydrocarbons	Chlorinated solvent impacted soils which may contain potentially separate phase liquid entrapped within the soil matrix, residues from industrial waste treatment /process operations.	Chemical oxidation	Bioremediation / immobilisation
C	Metals and metalloids ¹	Wastes from electrical processing sources, contaminated soils from property development, treatment wastes from mining	Immobilisation	Chemical reduction ²
D	Other specific waste streams	Includes a broad list of waste types that are considered to be similar in terms of grouping and will have a similar treatment "profiles" in terms of common primary treatment technology	Immobilisation	Chemical oxidation /bioremediation

Notes: 1. Excludes solid slags derived from metal processing industries
2. Chemical reduction will only be appropriate where a reduction in valency produces a less toxic chemical metal / metalloid form and may require both immobilisation and chemical reduction technologies to undertaken to comply with waste disposal criteria (subject to the chemical constituents).

2.2.2 Non-conforming waste

The following waste streams will not be accepted on Site (non-conforming):

[to be confirmed by conditions of consent]

- Dioxins as defined in the Chemical Control Orders (CCO)
- PFAS contaminated sludges.
- Asbestos
- Putrescible Wastes other than packaged wastes destined for destruction (such as dry food goods)
- Flammable Materials
- Hazardous wastes, pre-classified as per the EPA Waste Guidelines and not covered by a general immobilisation approval
- Radioactive Wastes.

2.3 Operations Overview

Figure 2 and the following sections outline the waste screening, receipt and treatment processes for the project.

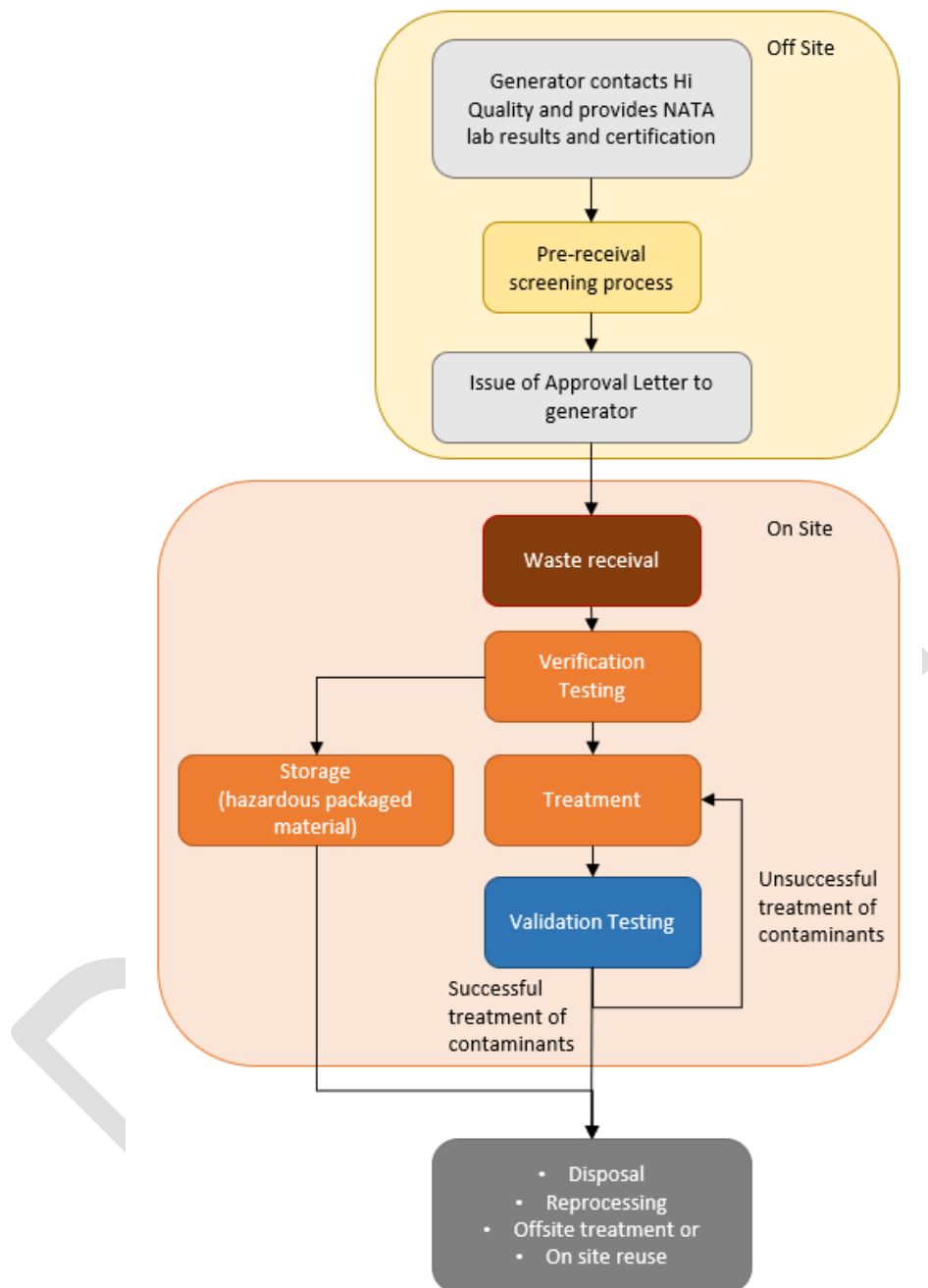


Figure 2-1 Operations overview

2.3.1 Characterisation and screening of waste for treatment

Prior to accepting wastes at the WTF, a number of general requirements would need to be met by the waste generator (source of waste stream) to ensure compliance with the NSW EPA requirements for handling and receiving wastes. The waste generator will need to demonstrate compliance with the NSW Waste Classification Guidelines to ensure the general requirements for waste classification are met prior to approval of the waste for receival at the Site.



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The waste generator would be responsible for providing adequate data to enable an appraisal of treatability of the waste to be completed. Hi-Quality will review the data and determine whether further analysis and /or bench scale testing is required to confirm treatability of the waste at the WTF. Once Hi-Quality has reviewed this data and confirmed that the waste is suitable for receipt and treatment at the WTF a letter of approval would be issued to the waste generator specifying type and quantity of waste to be accepted and the primary treatment technology to be applied.

Figure 2-3 provides an overview of the WTF waste screening and treatment processes.

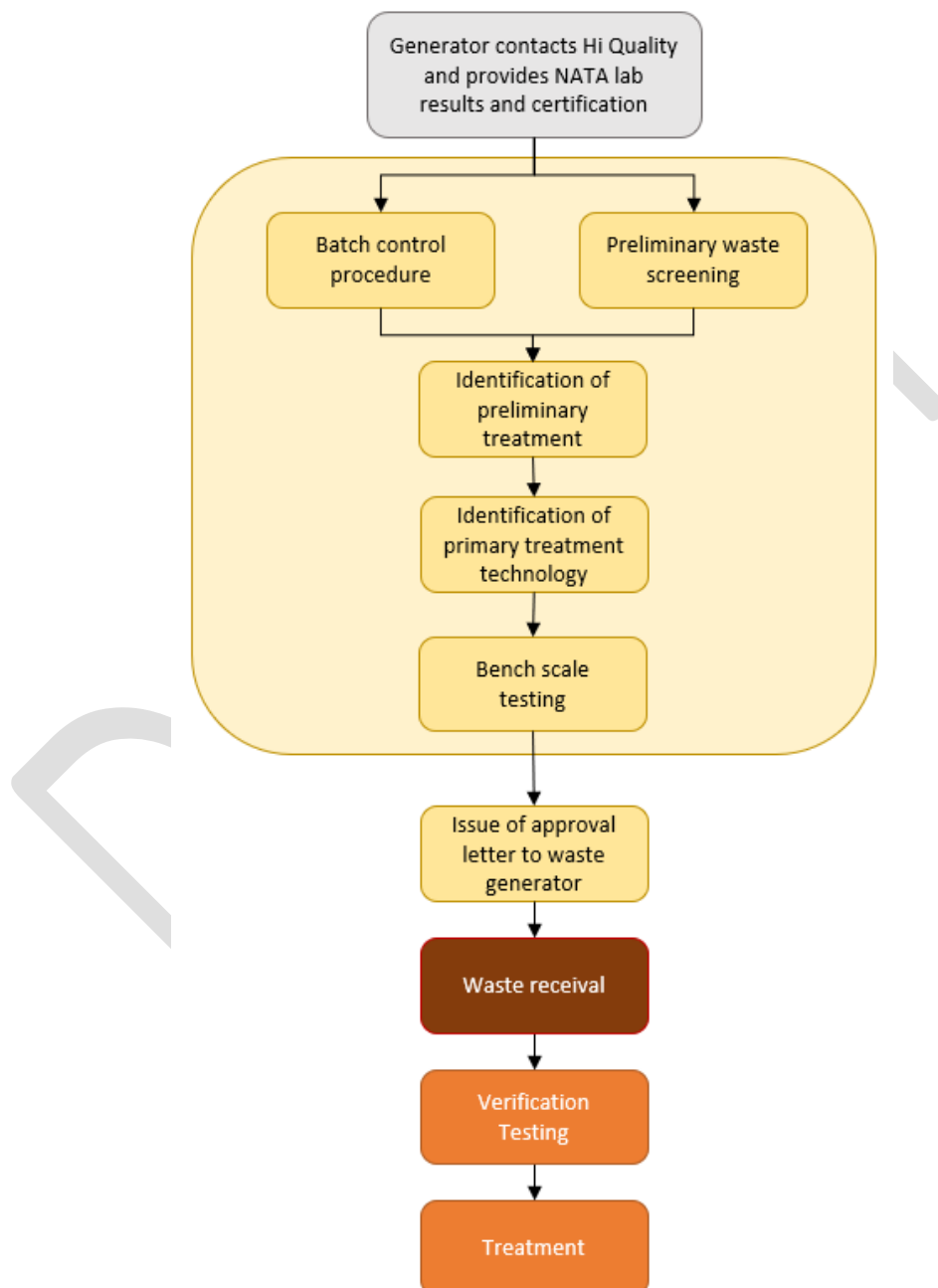


Figure 2-2: Characterisation and screening of waste and treatment technology



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2.3.2 Waste tracking

All wastes received at the WTF would be tracked from the waste generator through to destination facility (eg landfill), consistent with the Protection of the Environment Operations (Waste) Regulation 2014.

The waste generator would be responsible for generating and providing a consignment authorisation number (CA), any UN Hazard Code (if applicable) and waste form, in accordance with regulatory requirements. Tracking will be undertaken using the waste generators CA, waste form and code and Unique Identification Number (UIN) allocated by Hi-Quality.

Analytical data provided by the waste producer will be reviewed on arrival at the entry weighbridge to ensure the classifications provided are correct.

In accordance with the Protection of Environment Operations (Waste) Regulations 2014, the following records will be maintained on Site:

- Waste type
- Waste form and waste code (including CA Number)
- Vehicle transport details
- Weighbridge details (waste in codes and consignment reference number and total tonnage)
- Contaminants of concern (COCs) or contaminants of potential concern (COPC)
- Waste destination and transporter details
- Documented limits for any wastes that are subject to Chemical Control Orders (CCOs), noting that the NSW EPA Waste Classification Guidelines provide criteria for the following:
 - Limits for Aluminium Smelter Wastes (Fluoride / Cyanide)
 - Limits for solids contaminated with polychlorinated biphenyls (PCBs)
 - Organotins
 - Schedule Wastes.

Detailed weighbridge procedures for screening and acceptance of waste is presented in the following sections.

2.3.3 Waste receipt

All incoming wastes enter via the entry weighbridge located at the northern most gate. The weighbridge(s) would be the primary location on site for tracking waste, including monitoring the quantity, type and source of waste received on site, and the quantity, type and quality of the outputs produced on site, with the exception of treated wastewater discharged to sewer in accordance with Sydney Water requirements.

The weighbridge office would be responsible for all waste acceptance at the WTF. Records regarding the waste classification as per the NSW EPA Waste Classification Guidelines, onsite waste treatment and offsite disposal would be maintained at the Site.

The weighbridge operator would ensure that all incoming wastes are weighed, recorded and that the waste delivery matches the waste classification and screening records provided.

- At the weighbridge, if inconsistencies exist and / or the wastes is not consistent with the delivery expectations, the waste load will be rejected and the rejected load recorded within the rejected load register.



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- Where waste deliveries match their site waste screening records and approval, they will be directed by the weighbridge operator into the warehouse building and assigned to an appropriate unloading area.
- Visual inspection of load will be undertaken upon unloading.
- If inconsistencies exist and / or the wastes are not consistent with the delivery expectations, the waste load will be rejected and removed from Site and the rejected load recorded within the rejected load register.

When loads of non-conforming wastes are identified, the customer will be asked to leave the WTF with the load and the weighbridge operator would record the information in the rejected loads register.

2.4 Overview of Waste Treatment and Management Processes

The following sections outline the waste treatment and management processes that would be undertaken on the Site. General processing activities and associated volumes are summarised in Figure 2-4

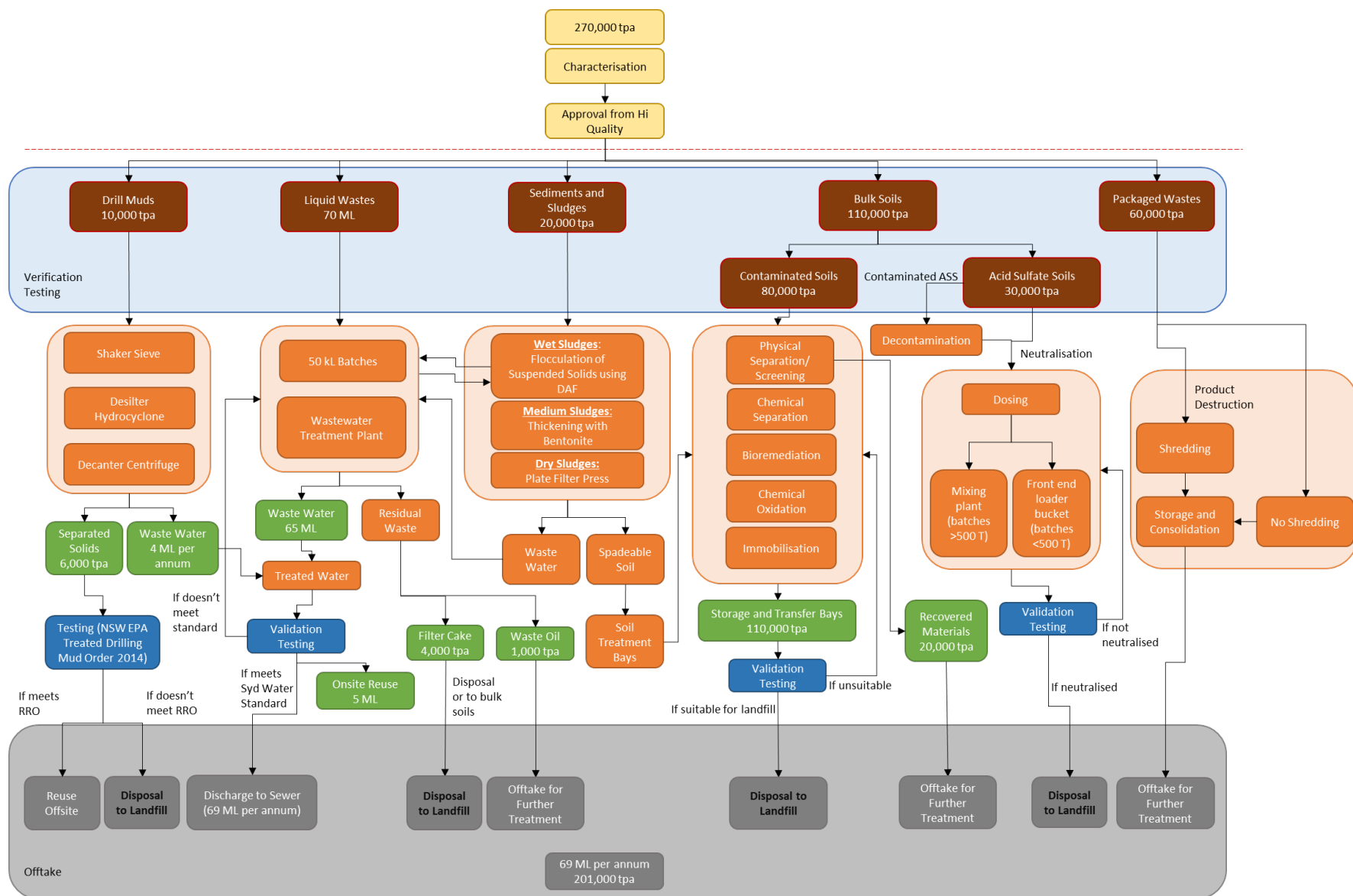


Figure 2-3: WTF waste treatment overview



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2.4.1 Packaged Waste

Different types of packaged waste would be received at the WTF and would be subject to different management and treatment methodologies. Broadly, there are two categories:

- **Packaged wastes for product destruction** – these materials are to be received to site for the purpose of destruction by way of shredding. Once completed, this waste would be pre-classified and disposed of according to the specific nature of the waste material, and
- **Packaged waste consisting of assorted industrial chemicals for temporary storage prior to offsite disposal** – this material is to be received to site for safe storage and holding while suitable disposal destinations are arranged. Validation testing would occur for these wastes to confirm the waste type.

Dedicated storage areas have been established for the storage of packaged chemical waste.

2.4.2 Soils, Sediments and Sludges

Figure 2-5 provides an overview of the management and treatment processes for soils and sludges accepted at the WTF.

As noted above, each batch of waste received on site would be assigned an UIN, batch number and sub-batch number (if required). Each batch of soil waste would be received onsite into designated receipt bays prior to being moved to the appropriate treatment bay, for either dewatering, treatment or storage. The UIN would be used to track waste batches as they are transferred between bays within the WTF. Between loads, bays would be cleaned to remove all visible material prior to the next load being received or treated within a bay. PFAS contaminated soil would be stored in designated bays which would not be used for the storage of any other material. Prior to the removal of soil from the Site appropriate criteria limits would be met whether it be for material reuse or landfill acceptance criteria.

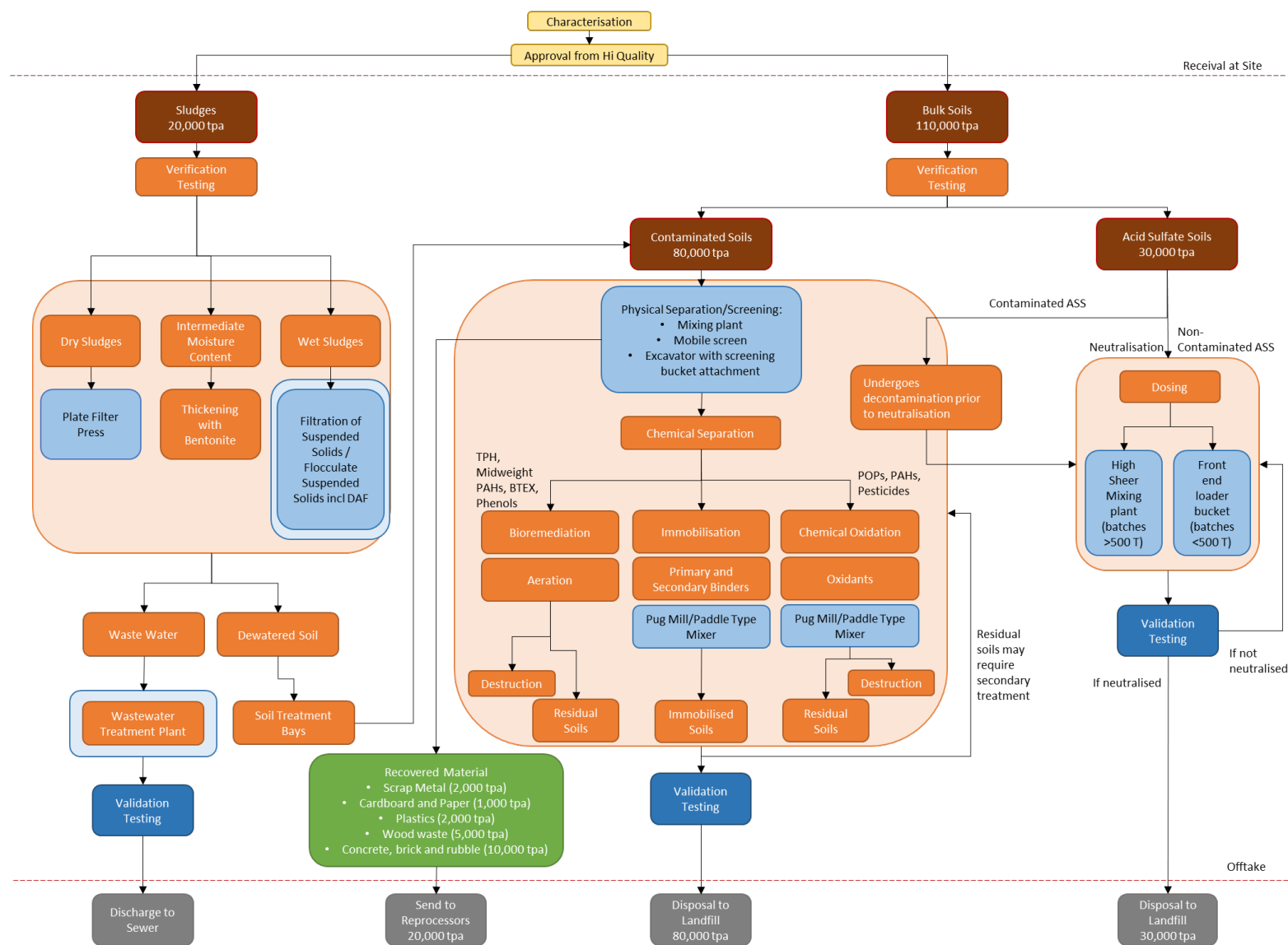


Figure 2-4: Management and treatment process overview for soils and sludges



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2.4.2.1 Acid Sulfate Soils (ASS)

The WTF would treat up to 30,000 tpa of received potential ASS. The acceptance and treatment of ASS to the Site will be in general accordance with the *NSW EPA Waste Classification Guidelines 2014 Part 4: Acid Sulfate Soils*.

Treatment of ASS would be undertaken in a batch process using a high-sheer mixer and automated lime dosing system. It is proposed that both uncontaminated and potentially contaminated PASS/ASS are to be treated onsite.

2.4.2.2 Contaminated Soils and Sludges

Approximately, 80,000 tpa of bulk soils and around 20,000 tpa of sludges would be treated at the WTF. An overview of the treatment process for bulk soils and sludges is provided in **Figure 2-5**. Bulk soils generally comprises of contaminated soils or ASS (refer to **Section 2.4.2.1**).

- **Contaminated soils:** The incoming bulk soils would be delivered by a tipper or truck and dog and unloaded into pre allocate bays to maintain separation of each source material. Bulk soils will be subject to different treatments. The WTF would treat up to 80,000 tpa of contaminated soil using destructive technologies (refer to **Section 2.4.2**).
- **Sludges:** All sludges will be delivered to Site by tanker and would be unloaded into above ground pits. Approximately, 20,000 tpa would be treated.

Treatment processes for soils and sludges would comprise of one or a combination of the following technologies that would be applied as appropriate to the identified contaminants of concern for each batch.

- Pre-treatment processes:
 - Dewatering / Drying: This process would be applied to sediments and sludges that contain excess liquid either as a result of being transported to site as such, or following separation from liquid waste within other stages or treatment within the WTF. Treatment appropriate to the level of liquid content will determine where the treatment process sediments or sludge will commence. I.e. dry sludges will not require the same level of treatment of a wet sludge.
 - Physical Screening: Pre-treatment processes such as physical screening would be used to remove any significant volumes of non-hazardous waste material, including concrete, brick, tile, plastic etc from the received soils prior to treatment. Oversize material separated from the soils would then be assessed for offsite disposal as pre-classified waste under the NSW EPA Waste Classification Guidelines 2014 Part 1: Classifying Waste or disposed for recycling in accordance with any relevant Resource Recovery Orders and Exemptions, or site specific EPLs.
 - Chemical Separation / pre-treatment: This would principally be applied to heavily hydrocarbon impacted soil or soils containing non-aqueous phase liquid (NAPL). Collected hydrocarbon waste from this process would be transferred to appropriate storage containers for offsite disposal to a licensed recycling facility.
- Chemical Oxidisation: This process would be optimised for soils contaminated with persistent organic pollutants such as chlorinated Hydrocarbons, PAHs and pesticides.

- Bioremediation: Soils containing organic compounds may be identified as an appropriate for bioremediation. Screening and suitability bench testing would be conducted to determine the final processes to be implemented. It is expected that bioremediation would only be applied to the material to the point that soils can be classified as Restricted Soil or General Soil waste. If bioremediation alone cannot achieve this level of reduction, other treatment processes in the WTF would be employed.
- Immobilisation: Specific immobilisation techniques would be undertaken as per the processes and procedures outlined in the specific exemptions approved and endorsed by the NSW EPA.

2.4.2.3 PFAS Contaminated Soils

PFAS contaminated soils would be received onsite for the purpose of storage while appropriate offsite disposal options are identified. There would be no mixing of PFAS contaminated soils with other soils received at the Site. PFAS contaminated soils would be stored in designated bays to avoid cross-contamination.

2.4.3 Drill Muds – Resource Recovery

The WTF would accept drilling mud from non-contaminated drilling operations.

Approximately 10,000 tonnes of non-contaminated drilling mud waste would be processed at the Site per annum. The process involves separation of the soil particles from the drilling mud using separation technologies including sieves, hydrocyclone and centrifuge.

2.4.4 Liquid Waste

Approximately, 70 ML per annum of wastewater would be treated at the Site, equating to approximately 1-2 ML per day. This would comprise of:

- Industrial wastewater received from third party industrial and commercial organisations
- Liquid waste generated from the other treatment processes at the WTF including:
 - Leachate from potentially contaminated soils
 - Decanted water from settled sludge
 - Residual wastewater from internal soil washing process
 - Potentially contaminated water from internal truck and wheel wash.

The WTF has two custom designed and built wastewater treatment plants for the treatment of wastewater, with a separate storage tank and wastewater treatment plant is used for PFAS contaminated water. The treatment of liquid waste not containing PFAS would include the following processes, as shown in Figure 2-6:

- Acid/caustic, coagulant and polymer dosing to prepare wastewater for gravity separation
- Gravity separation via clarifier
- Dissolved air flotation (DAF)
- Sand media filtration for particulate removal
- Granular activated carbon filtration for hydrocarbon and PFAS adsorption
- Ion exchange filtration for PFAS adsorption and final polishing
- pH correction
- Sludge thickening to treat sludge from the clarifiers and DAF units
- Sludge dewatering via screw press.

The treatment of liquid wastes containing PFAS would include the following processes, in order of treatment process, as shown in Figure 2-6:

- A holding tank
- A chemical dosing and mixing tank
- A clarifier to remove sludges and other solids

- Treatment through Zeolite filtration
- Treatment through coal granular activated carbon (GAC) filtration
- Treatment through coconut GAC
- Treatment through a weak base anion exchange resin
- Treatment through high activity GAC; and finally,
- A holding tank for storage and testing prior to discharge.

Following treatment, the waste water would be analysed against Sydney Water Trade Waste Acceptance Criteria and would be disposed as liquid trade waste to sewer in accordance with a Sydney Water Trade Waste Agreement if compliant with the criteria (refer to **Section 3.3**). Discharge would not occur until the applicable discharge limits are met for all criteria.

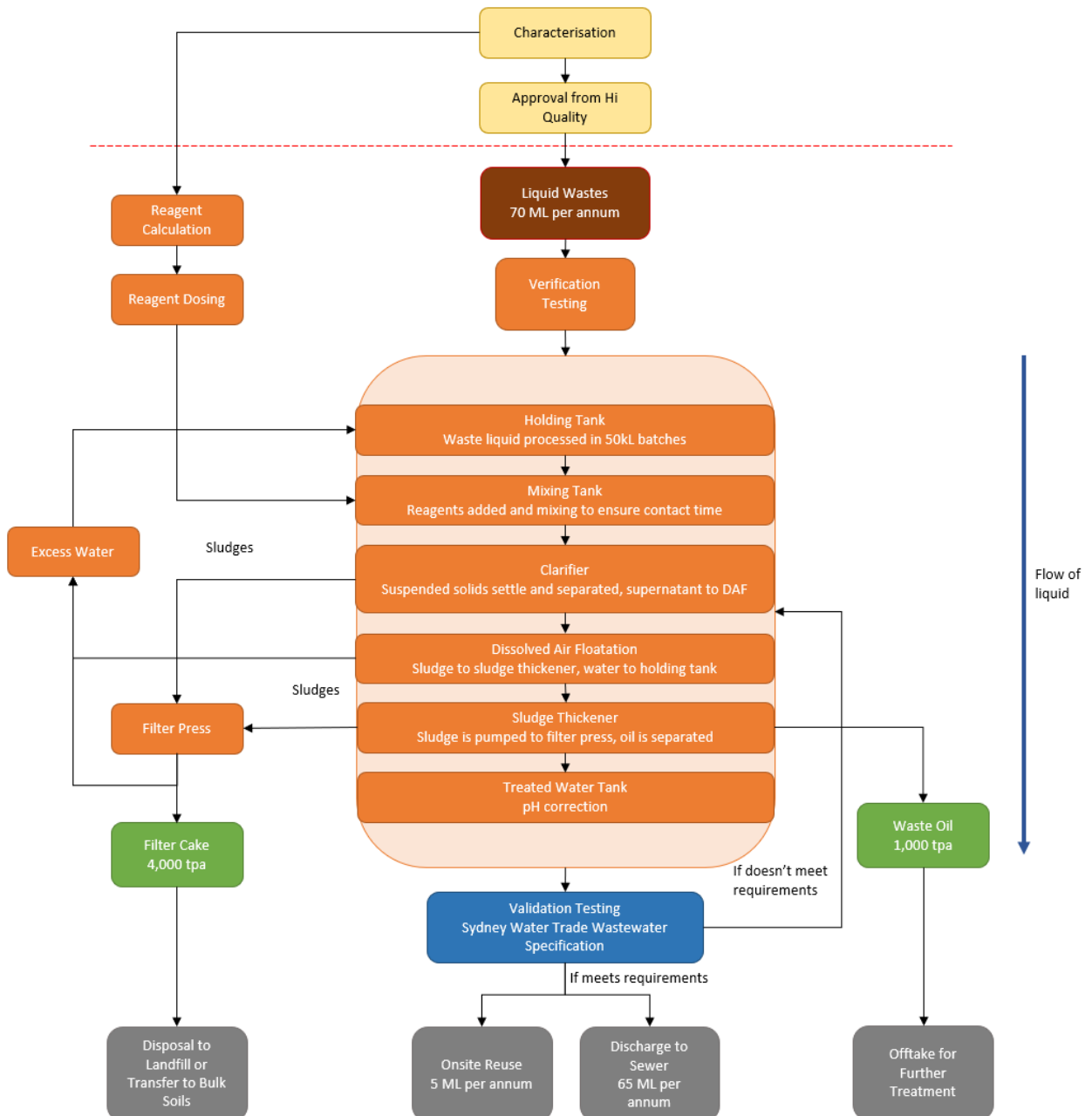


Figure 2-5: Treatment overview for liquid wastes

2.6 Leachate Management System

Leachate collection pits would capture potentially contaminated runoff within the building. During Stage 1 leachate would be collected in the leachate collection pits and pumped to temporary holding tanks to be tested. If the leachate meets the requirements of the Trade Waste Agreement between Hi-Quality and Sydney Water, the leachate would be discharged to sewer. If the leachate does not meet the Trade Waste Agreement discharge requirements, it would be pumped out and disposed of off-site at an appropriately licenced facility.

During Stage 2 operations the leachate collection pits would pump to the Wastewater Treatment Plant for treatment of liquid waste prior to discharge to the sewer, in accordance with a Trade Waste Agreement with Sydney Water. Water discharged to sewer would be sampled in accordance with the requirements of the Trade Waste Agreement, prior to discharge. Testing would occur prior to every discharge event and discharge would not occur if the designated criteria cannot be met. The proposed leachate management system would ensure segregation between clean stormwater runoff and potentially contaminated run off.

2.7 Fire Protection

The WTF is consistent with FRNSW Guidelines and provides for:

- Access for firefighters and emergency vehicles
- Sprinkler and Fire Hydrant System design (including appropriate water pressure)
- Fire detection and alarm system
- Smoke Hazard Management
- Fire Water Run-Off Containment
- Stockpile location and size compliant with FRNSW Guideline requirements.

The proposed site plan with fire services for the WTF is shown in **Figure 2-7**. This includes:

- Main Fire Indicator Panel located in the office of the Ground Floor
- New sprinkler booster assembly located along the truck entryway to the building adjacent the proposed sprinkler valve room.
- A new hydrant booster assembly.

Fire incidents would be managed in accordance with the Emergency Management Plan (Appendix C) and all staff will receive training in emergency procedures and evacuation routes. Fire wardens would be nominated.



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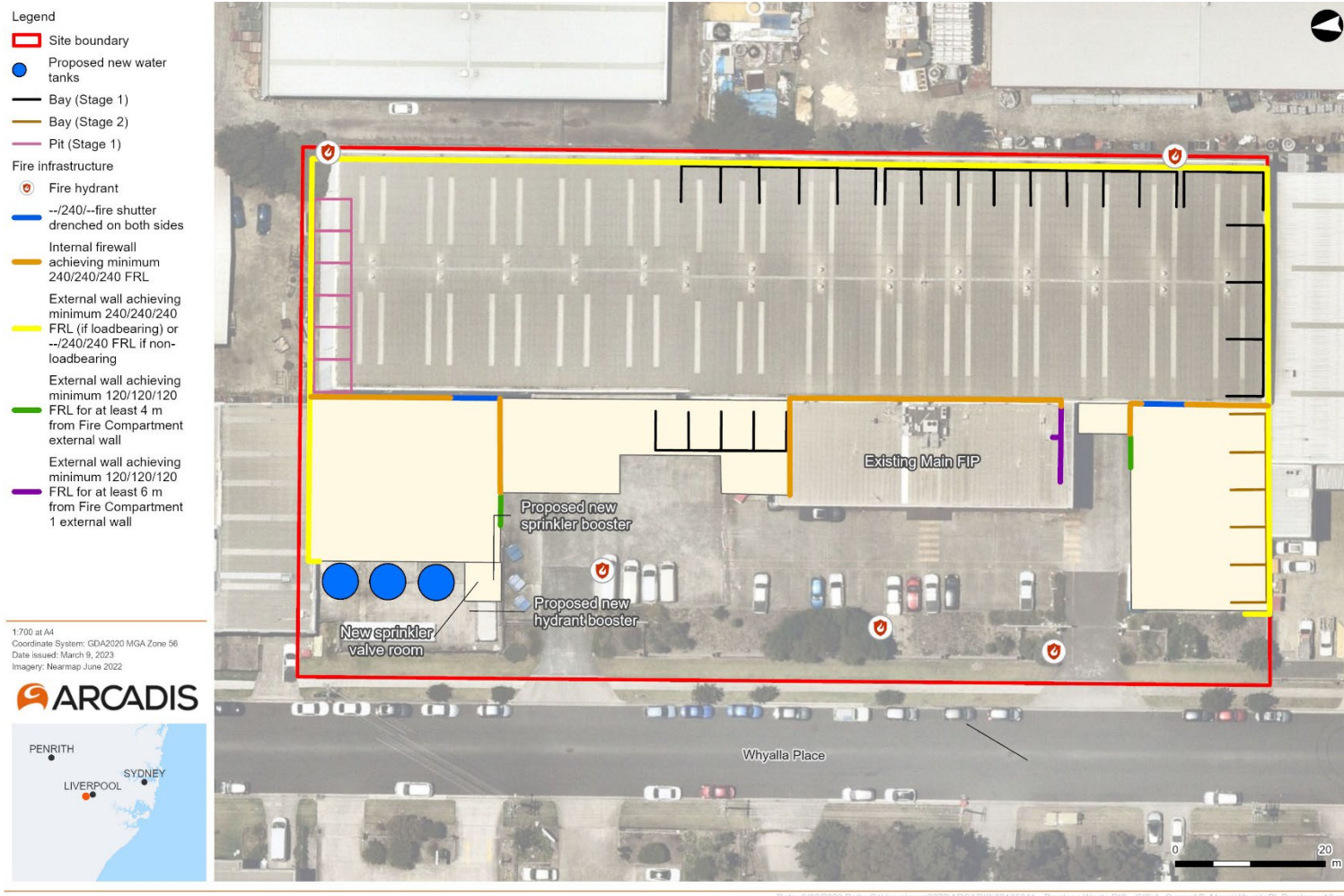


Figure 2-7: Proposed fire safety measures



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2.8 Operating Hours

The WTF would receive waste 24 hours a day.

Processing and dispatch operations would be undertaken between:

- 7:00 am to 6:00 pm Monday to Saturday and
- 8:00 am to 6:00 pm Sundays and Public Holidays.

DRAFT

3 STATUTORY REQUIREMENTS

Operation of the WTF is required to comply with all relevant legislation, permits, licences and development approvals that apply to the Facility.

This section provides an overview of the environmental planning and statutory context for the operations of the Facility. It also describes the WTF operations in the context of Hi-Quality's corporate environmental and sustainability policies.

Compliance to applicable regulatory requirements concerning the operations of the WTF will be achieved through:

- Identifying and accessing legal and other requirements which are directly applicable to the organisation
- Consulting and involving relevant government agencies
- Internally communicating relevant information regarding legal and other requirements
- Continually auditing, reviewing and upgrading company systems, management plans and supporting documentation
- Providing relevant training.

3.1 Development Consent

Hi-Quality has submitted a State Significant Development (SSD) application (SSD 9346594) for the construction and operation of the Prestons WTF in accordance with Part 4, Division 4.7 of the EP&A Act. Once the WTF has been approved, Conditions of Consent will be issued by the DPE which will identify measures that are required to:

- Prevent, minimise, and/or offset adverse environmental impacts
- Set standards and performance measures for acceptable environmental performance
- Require regular monitoring and reporting
- Provide for the ongoing environmental management of the development.

[This Section of the OEMP will be updated following the issuing of the Conditions of Consent]

A summary of relevant conditions which relate to the development of an OEMP have been provided in **Table 3-1**. The table also provides and a cross reference to where the Condition has been addressed in the OEMP.

Table 3-1: Anticipated Conditions of Consent relevant to the OEMP

Condition #	Requirements	Where addressed
TBC	The Applicant must prepare an Operation Environmental Management Plan (OEMP) to the satisfaction of the secretary. The OEMP must:	This Plan
	Be submitted to the Secretary for approval prior to the commencement of operation;	Section 1.6
	be prepared by a suitably qualified and experienced expert;	TBC
	provide the strategic framework for environmental management of the Development;	Section 4
TBC	identify the statutory approvals that apply to the Development;	Section 2.8
	describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development;	Section 4.3 Table 4-1
	describe the procedures that would be implemented to:	Section 4.5

Condition #	Requirements	Where addressed
	keep the local community and relevant agencies informed about the operation and environmental performance of the Development;	
	receive, handle, respond to, and record complaints;	Section 4.6
	resolve any disputes that may arise;	
	respond to any non-compliance;	Section 6.3
	respond to emergencies; and	Section 4.9
	include the following environmental management plans: ---- TBC	Section 1.3
	Not commence operation until the OEMP is approved by the Secretary; and	Section 1.6
	Operate the Development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time)	Section 1.6
Management Plan Requirements		
TBC	The Applicant must ensure that the environmental management plans required under Condition XX of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include:	
	detailed baseline data;	Section 2 Relevant sub-plan
	a description of: the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Section 2.8
	any relevant limits or performance measures/criteria; and	Section 2 Relevant sub-plan
	the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of the Development or management measures;	Section 2 Relevant sub-plan Section 5
	a description of the management measures that would be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;	Relevant sub-plan Section 5
	- a program to monitor and report on the: - impacts and environmental performance of the Development; and effectiveness of any management measures (see (c) above);	Relevant sub-plan Section 6.1
	– a contingency plan to manage any unpredicted impacts and their consequences;	Relevant sub-plan Section 6.6
	– a program to investigate and implement ways to improve the environmental performance of the Development over time;	Relevant sub-plan Section 6.7
	- a protocol for managing and reporting any: - incidents;	Section 4.8
	– complaints;	Section 4.6
	– non-compliances with statutory requirements; and	Section 6.3

Condition #	Requirements	Where addressed
	– exceedances of the impact assessment criteria and/or performance criteria; and	Section 6.3
	– a protocol for periodic review of the plan.	Section 6.5

3.2 Applicable Legalisation

3.2.1 *Protection of the Environment Operations Act 1997*

The *Protection of the Environment Operations Act 1997* (POEO Act) aims to manage pollution and waste disposal in NSW, and is administered by the NSW EPA. Part 1 of Schedule 1 of the POEO Act defines premise based scheduled activities that require an Environment Protection Licence (EPL).

The Facility will require an Environmental Protection Licence (EPL) under the POEO Act. This will be considered as part of the State Significant Development assessment process.

3.2.2 *Protection of the Environment Operations (Waste) Regulation 2014*

The Protection of the Environment Operations (Waste) Regulation (POEO (Waste) Regulation) requires tracking of certain waste within NSW and between participating States. Each party must be authorised to store, transport, or receive the specific type of waste. Schedule 1 of the POEO (Waste) Regulation identifies the types of waste which apply. In addition, the POEO (Waste) Regulation has specific reporting and record-keeping requirements. It is an offence under the PoEO Act to wilfully or negligently dispose of waste in a manner that harms or is likely to harm the environment.

The Regulation also prescribes the requirements for recording information relating to:

- The delivery of waste or other material at scheduled waste facilities
- Loads of waste or other material transported from the facility for use, recovery, recycling, processing or disposal at another place
- Other vehicles entering the facility for a purpose related to the operation of the facility.

As per Clause 15 of the regulation a weighbridge to ensure that the quantity of waste being transported to and from the Site is correctly recorded, would be installed.

Immobilisation approvals will be required for the Facility in accordance with Part 10 of the POEO (Waste) Regulation.

3.2.3 *Contaminated Lands Management Act 1997*

The principal object of the *Contaminated Land Management Act 1997* (CLM Act) is to establish a process for investigating and, where appropriate, remediating land that the EPA considers to be contaminated significantly enough to require regulation. The Act outlines investigative processes for land contamination should it occur on the premises.

The results of the Phase 1 Site Investigation and the Limited Phase 2 Site Investigation prepared as part of the EIA, indicate that the overall potential for widespread significant soil or groundwater contamination at the Site as low. The Site currently presents a low risk to on-site and off-site receptors and is considered to be suitable for ongoing commercial/industrial land use.

3.2.4 *Waste Avoidance and Resource Recovery Act 2001*

The *Waste and Resource Recovery Act 2001* (WARR Act) is the principal piece of legislation governing waste and resource management in NSW. The Act seeks to maximise the utility of resources including waste and minimise disposal of resources to landfill.

3.2.5 Water Management Act 2000

The *Water Management Act 2000* (WMA) aims to facilitate the sustainable and efficient use of water in such a way that benefits the environment and communities. The WMA provides for the preparation of water management plans that outline arrangements for water sharing, water source protection and drainage management. The Act outlines the requirement of the Facility to practice safe water management practices to ensure polluted waters, should they occur on the premises, are contained and properly managed

3.2.6 Work Health and Safety Act 2011

The main object of the *Work Health and Safety Act 2011* (WHS Act) is to provide for a balanced and nationally consistent framework to secure the health and safety of workers and workplaces.

The Act requires that workers and other persons should be given the highest level of protection against harm to their health, safety and welfare from hazards and risks arising from work or from specified types of substances or plant as is reasonably practicable.

3.3 Permits and Licences

A summary of the key permits and licences applicable to the Facility, in addition to the Condition of Consent, is provided in **Table 3-2**.

Table 3-2: Key permits and licences

Licence / Permit Number	Licence	Regulator	Issued Date	Review Date
TBC	Environment Protection Licence (EPL)	NSW EPA	TBC	TBC
TBC	Specific immobilisation approvals	NSW EPA	TBC	TBC
TBC	Trade Waste Agreement	Sydney Water	TBC	TBC

3.4 Guidelines

The WTF design and operating procedures documented have due regard to relevant guidelines and codes of practice including but not limited to:

- Waste Classification Guidelines – Part 1 (including Addendum): Classifying Waste, EPA, November 2014
- AS1940-2004 The Storage and Handling of Flammable and Combustible Liquids
- Controlled Waste National Environment Protection Measure (NEPM)¹;
- Resource Recovery Orders and Resource Recovery Exemptions under *Protection of the Environment Operations (Waste) Regulations 2014* (Clause 93)
- Noise Policy for Industry (2017)
- Industrial Noise Policy Application Notes (EPA 2013)
- Road Noise Policy (EPA 2011)
- Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales
- Approved methods for the sampling and analysis of air pollutants.

¹ [National Environment Protection \(Movement of Controlled Waste between States and Territories\) Measure | National Environment Protection Council \(nepc.gov.au\)](https://www.nepc.gov.au/nepm)



4 ENVIRONMENTAL MANAGEMENT

4.1 SEQ Management System

Hi-Quality's Quality system has documented procedures and processes for managing non-conforming work practices and initiating corrective/preventative actions or system improvements.

The Hi-Quality Group manages its operations with strict adherence to safety compliance, quality systems and environmental performance and sustainability. Hi-Quality Group has obtained ISO accreditation in:

- Quality Management System Scheme certificate - AS/NZS ISO 9001-2016
- Occupational Health and Safety Management System Scheme Certificate - AS/NZS 4801-2001 and AS/NZS ISO 45001-2018
- Environmental Management System Scheme Certificate - AS/NZS ISO 14001-2016.



4.2 SEQ Policies

4.2.1 Safety

The Hi-Quality Group is committed to achieving the highest performance in health and safety with the aim of maintaining a safe and healthy work environment so far as reasonably practicable. To maintain a healthy and proactive safety culture, Hi-Quality has implemented a policy that cannot be compromised. The company's 'Life Saving Rules' are fundamental for all operational activities that employees engage in whilst at work.

4.2.2 Quality

Quality products and services are the benchmark for the Hi-Quality Group. The Hi-Quality Group aim to provide products and services that consistently meet, if not exceed, customer requirements and expectations. The Hi-Quality Group believe in the quality assurance mantra of '*getting it right first time*' and accreditation to AS/NZS ISO 9001-2016 ensures that a management system is in place to help meet the relevant objectives.

4.2.3 Environment

The Hi-Quality Group recognises the importance of integral environmental management. We acknowledge that environmental management requires continual assessment and improvement. This is how we do business to enable us to work effectively in a diverse range of environments and community settings. Consistent with Hi-Quality's Environmental Policy, the intended outcomes of Hi-Quality's Environmental Management System (EMS) are for:

- Enhancement of environmental objectives
- Fulfilment of compliance obligations
- Achievement of environmental objectives.



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4.3 Roles and Responsibilities

The General Manager for Hi-Quality carries ultimate responsibility for the implementation of this OEMP and providing the necessary resources as required. The Site Manager is responsible for coordinating the monitoring, reporting and responsibility requirements of this management plan.

Operational employees and/or contractors are responsible for responding to adverse site conditions and adjusting site operations to minimise environmental impacts. All site employees and/or contractors are responsible for reporting adverse site conditions to the Site Manager, who is responsible for review and formulation of appropriate action planning and response.

Table 4-1 presents roles and responsibilities for implementing the OEMP.

Table 4-1: Environmental Roles and Responsibilities

Role	Responsibilities
General Manager	• Overall responsibility for implementation of the OEMP and monitoring the effectiveness of the OEMP and rectifying deficiencies in the OEMP • Approve the OEMP • Oversee the implementation of the EMP for the site • Regularly review site environmental performance and report as required • Oversee regular review and update of the EMP • Liaison with external authorities and regulators as required
Site Manager	• Implement the OEMP • Ensure subcontractors are inducted to and comply with the EMP • Undertake and record regular site inspections • Monitor compliance with the EMP • Ensure emergency response equipment is available on site and maintained • Co-ordinate emergency responses as necessary • Undertake community liaison as required • Participate in environmental management reviews of the EMP • Update and re-issue the EMP as required • Liaise with relevant authorities regarding environmental management requirements • Complaints management • Raise, investigate and report non-conformances and implement corrective actions
Technical Manager	• Responsible for overseeing the testing and bench testing at the Site • Responsible for issuing a Letter of Approvals to waste generators prior to receipt of waste deliveries at the facility.
Environmental Manager	• Participate in environmental management reviews of the OEMP • Engage the environmental consultant as and when required • Monitor overall environmental management performance • Report compliance with regulatory requirements



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Role	Responsibilities
	• Liaison with external authorities and regulators as required
Operational Staff	• Material inspection, processing and screening • Identifying and handling of unacceptable materials • Dust suppression and noise management • Management of surface water and ground water • Inspection and cleaning of vehicles leaving the site • Operation, maintenance and servicing of plant & equipment.

4.4 Training and Competence

All personnel undertaking work at the WTF will undergo general environmental awareness training and training relevant to their responsibilities under this OEMP.

In addition to the induction program, training will be provided as deemed necessary to employees and contractors to provide them with the knowledge, skills and awareness to minimise environmental impact. Targeted environmental awareness training will also be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact.

Records of environmental inductions and other environmental training will be maintained and readily accessible within the Hi-Quality SHEQ system.

4.4.1 Inductions

All employees and contractors are required to complete a Hi-Quality general site induction and will be made aware of their environmental responsibilities. The site induction includes:

- An overview of the Site Rules, Environment Policy and general environmental requirements
- Legal and other obligations
- Environmental incident and community compliant reporting requirements
- Emergency response procedures on site
- Correct use of spill kit
- Environmental awareness of environmental protection responsibilities and measures to minimise environmental impacts.

4.4.2 Toolbox Talks

Toolbox talks will be used to raise awareness and educate employees and contractor on specific environmental issues including contaminated materials, waste management measures and other environmental issues relevant to the site. All site personnel are required to complete refresher training on an annual basis via a toolbox meeting.

Toolbox talks tailored to specific environmental issues include:

- Emergency and spill response
- Biodiversity, clearing controls and vegetation protection
- Weed management
- Noise and air quality controls



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- Housekeeping and waste.

Attendance at daily site Toolbox talks is mandatory and attendees of Toolbox talks are required to sign an attendance form. Records of Toolbox attendance is maintained within the Hi-Quality SHEQ system.

4.4.3 Other Targeted environmental awareness training

Other environment related training is provided as needed to operational personnel and may include:

- Customer service
- Asbestos awareness and identification
- Excavation, loading and stockpiling of materials
- Material inspection, processing and screening
- Recording of material types, categories, volume
- Dust suppression and noise management
- Management of surface water and groundwater
- Compliance with environmental and project approval requirements
- Operation, maintenance and servicing of plant and equipment.

4.5 Communications

4.5.1 Internal Communication

Clear communication throughout all levels and functions, such as employees and contractors, is key to minimising environmental impacts and achieving continual improvements in environmental performance.

The Environment Manager will meet periodically with the Site Manager to discuss onsite environmental management, amendments to plans, environmental monitoring results and other relevant aspects of the operation.

The Environmental Manager will participate, as required, in toolbox talks to communicate with the site employees and contractors on environmental performance and to receive feedback on any areas for suggested improvements to environmental management of the site.

4.5.2 Communication with Agencies and Authorities

The Environmental Manager will be the main point of contact regarding specific environmental issues. The Environmental Manager has the responsibility to report on the ongoing environmental performance of the site to agencies and authorities.

4.6 Complaints Management

A telephone complaints line is available during operating hours to receive complaints from members of the public.

Telephone: 1800 261 666

Email address: community@hiquality.com.au



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The public will be notified of the complaints line number such that the impacted community knows how to lodge a complaint.

If an environmental complaint (such as a complaint regarding noise or pollution) is received during operations at the Site, the Site Manager is to be immediately notified. The Site Manager will then prepare a written report and enter the complaint into the electronic database within 24 hours.

Hi-Quality will keep a written record of all complaints. The record will include:

- Date and time of complaint
- 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 Hi-Quality in relation to the complaint, including any follow up contact with the complainant
- If no action was taken by Hi-Quality, the reasons why no action was taken.

4.7 Incident Management

As required under EP LXXXXX, a Pollution Incident Response Management Plan (PIRMP) has been developed.

The primary objective of the PIRMP is to minimise and control the risk of a pollution incidents at the WTF, to allow comprehensive and timely communication about a pollution incident to staff at the premises, the EPA, other relevant government agencies and community members who may be affected by the impacts of the pollution incident.

The PIRMP outlines the followings:

- Description and likelihood of hazards
- PIRMP Test Register
- Communicating with neighbours and the community
- Minimising harm to persons on the premises
- Actions to be taken during or immediately after a pollution incident.

All environmental incidents will be managed in accordance with the flowchart shown in **Figure 4-1**.



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INCIDENT RESPONSE

STOP the work immediately and **CHECK** for personnel safety.

Senior member of the team present when an incident occurs is to take charge and **DELEGATE** the main assisting roles of the emergency response.

Identify the spill material and refer to **SAFETY DATA SHEET** for advice on personnel treatment and notify the Site Manager

IF REQUIRED

CONTACT Site Emergency Response Team and await further assistance if required.
CONTACT emergency services (000) If an incident presents an immediate threat to human health or property.

WEAR appropriate PPE.

ELIMINATE sources of danger
CONTROL the source of the incident e.g. right an upturned drum

CONTAIN the incident e.g. use spill kit material to control spills.
CHECK the incident does not have the potential to cause further harm (e.g. check spill has not reached the local stormwater drains)

INTERNAL NOTIFICATION of the incident to the **OPERATIONS MANAGER**

Where required undertake external notification with the relevant agency (e.g., EPA and DPE Compliance)

CLEAN UP plan to be prepared and implemented

Figure 4-1: Environmental Incident Response Flowchart

4.8 Incident Notification Requirements

Incident notification processes will reflect the extent of the event and the incident classification.

Regulatory Authorities will be notified of reportable incidents (refer to **Section 4.8.1**) in accordance with the requirements of the Condition **XX**. Records of incidents will be maintained by the Site Manager and will include details of which external authority was contacted and what information provided.

[Below is anticipated a part of Conditions of Consent – to be updated if required]



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4.8.1 Notifiable Incident Classification

Environmental incidents are classified as either notifiable or non-notifiable:

- **Notifiable incidents** are those incidents or potential incidents that cause actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or where results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000.
- **Non-notifiable incidents** are those that do not trigger the threshold but have the potential to impact on human health and the environment.

4.8.2 Incident Notification

If an environmental incident occurs, the WTF workers will immediately notify one or more of the Emergency Contacts, listed in **Table 4-2**. That person/s will then decide whether to notify DPIE, EPA or both. If these regulators are notified, other regulatory authorities that also require notification under the PIRMP may include:

- Local council
- Ministry of Health
- Fire and Rescue NSW
- SafeWork NSW
- Any other relevant authorities
- Third Party land holders (where appropriate).

DPE Notification

If it is determined that the DPE, EPA or both authorities require notification, this will be undertaken in accordance with the requirements of Condition XX. This requires that the DPE is notified within 24 hours of the incident or potential incident occurring.

A further detailed report must be prepared following investigations of the causes and identification of necessary additional preventive measures and submitted to the DPE no later than 14 days after the incident or potential incident

A register of accidents, incidents and potential incidents will be maintained and will be made available for inspection at any time by the independent Hazard Auditor and the Department.

EPA Notification

The EPA will also be notified of any incident that represents a threat to the environment due to a breach or breaches of EPL conditions. This will be done via the EPA's 24-hour Pollution Line (131 555) and a written notice will follow within 7 days.

4.8.3 Incident Review

A review of the incident will be undertaken.

4.9 Emergency Response

In the event of an emergency, the safety of people shall always be the FIRST PRIORITY. If there is an emergency, the procedures and instructions contained in the Emergency Plan will be adhered to. Appendix C summarises the procedures to follow in the event of an emergency.



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4.9.1 Emergency Contacts

Emergency contact details for the site are presented in **Table 4-2**.

Table 4-2: Emergency Contact Details

Services / Contact Name	Contact Name	Contact No.
Emergency		
Ambulance – Fire – Police	N/A	000
NSW Poisons Information	N/A	13 11 26
Local Services		
Liverpool Hospital	N/A	02 8738 3000
Other Agencies		
NSW Environmental Protection Authority	N/A	02 9995 5000
Safe Work NSW	N/A	13 10 50
Hi-Quality Group		
General Manager	TBC	
Site Manager	TBC	
Environmental Manager	TBC	



5 IMPLEMENTATION

This section addresses the key risks and environmental performance issues associated with the operation of the WTF and the environmental controls established to manage the key risks.

5.1 Operational Environmental Impacts

Operational environmental impacts for the WTF were identified and evaluated in the Environmental Impact Statement (EIS), prepared by Golder (November 2021).

A summary of the key potential environmental impacts that will require management during the operation of the Facility, are listed below and form the basis of the environmental risk assessment.

The key operational aspects include:

- Waste Management
- Access, Traffic and Parking
- Noise and Vibration
- Air Quality, Odour and Greenhouse Gas Emissions
- Soil and Water
- Hazards
- Human Health
- Fire and Incident Management
- Biodiversity
- Heritage
- Cumulative Impacts.

Contractors undertaking site activities at the WTF on behalf of Hi-Quality will be required to work under this OEMP but may utilise their own business and risk management systems and processes to develop any necessary site-specific safety and environmental management documentation and induction materials. The developed documentation and materials are to take into account the activity risk assessment, any relevant mitigation measures and any site / task specific risks that may require other or additional mitigation measures and controls to be applied.

5.2 Risk Assessment

As per Hi-Quality's EMS, a summary of the key potential environmental risks is provided in **Table 5-1**. Risk assessments are required prior to commencing any previously unforeseen activities on the Site.

Table 5-1: Environmental Risk Assessment and Management Actions

Operational Activity	Environmental Aspect	Potential Environmental Impact
Waste disposal/treatment	• Increased loading on traffic network due to truck movements. • Wheel generated dust emissions from plant movements and windblown dust from stockpiling and processing • Windblown litter • Increased greenhouse gas emissions from plant operation. • Increase in vibration and noise emissions during operations • Contamination of soil due to potential fuel spills or leaks • Contamination of waterways due to potential fuel spills or leaks	Traffic Air quality Climate change Noise Soil Water quality Waste



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Operational Activity	Environmental Aspect	Potential Environmental Impact
	- Receipt of non-conforming materials - Disposal of residual waste materials - Leachate contamination.	
Plant and vehicle maintenance, truck parking and refuelling	- Wheel generated dust emissions from plant movements - Increased greenhouse gas emissions from plant - Increase in vibration and noise emissions during operations - Contamination of soil due to potential hazardous chemical, fuel spills or leaks - Contamination of waterways due to potential hazardous chemicals, fuel spills or leaks - Storage of dangerous goods and hazardous materials.	Air Quality Climate Change Noise Soil Water Quality Fire
Administration	- Increased greenhouse gas emissions from electricity consumption from lighting and air conditioning - Generation of residual waste.	Climate Change Waste

5.3 Waste Management

The waste streams generated at the WTF, other than those generated through the waste treatment processes described in **Section 2**, comprise of general waste from operational staff and used reagent packaging. **Table 5-2** summarises the waste likely to be generated during operation of the WTF.

Table 5-2: Environmental Risk Assessment and Management Actions

Waste type	Waste Identified	Waste Description	Storage	Disposal / Reuse
General solid waste (putrescible)	Site office waste	Paper, cardboard co-mingled waste	2m ³ skip bins within the building	Offsite recycling
General solid waste (putrescible)	Site office waste	Generated from work, including lunch packaging	2m ³ skip bins within the building	Offsite disposal
Various	Packaging material	Used reagent packaging generated from operation	Remain within bunding until collected	Under no circumstance to be included in the general waste bin Reuse where possible

The Liverpool City Council Development Control Plan 2008 (Liverpool DCP) requires the design of the garbage/waste storage areas to comply with the following:

- The rooms shall be fully enclosed with concrete floor and concrete or cement rendered walls to the floor.
- A hose cock for hosing the garbage bin bay and a sewered drainage point in or adjacent to the bin storage area shall be provided. The drainage point should have a fine grade drain cover sufficient to prevent coarse pollutants from entering the sewer. If the hose cock is located inside the bin storage bay, it is not to protrude into the space indicated for the placement of bins.
- The room shall have a floor waste, which is to consist of a removable basket within a fixed basket arrestor and is to comply with Sydney Water requirements.



- The room must include a tight-fitting, self-closing door and mechanical ventilation.

5.3.1 Waste management mitigation measures

The mitigation measures proposed to be in place to prevent waste tracking from the Site include:

- Loads covered until inside the building and before leaving the building.
- A truck and wheel wash would be installed for trucks prior to exiting the building
- Entry and exit signage to advise transport operators of procedures.
- Unloading and loading within the building.
- Management principles are designed to minimise and control the waste and its disposal during ongoing site activities.

An operational Waste Management Plan will be prepared prior to commencement of operations that will specify procedures for weighbridge activities and reporting, tipping procedures, management of non-conforming loads and materials, operational contingencies and processes for assessing treatability of waste to be accepted at the WTF.

5.4 Access, Traffic and Parking

Separate access points are proposed for trucks and light vehicles.

Trucks accessing the WTF would perform a right-in to enter the Site at the northern driveway and proceed to one of two entry weighbridges. These vehicles would reverse into loading and unloading areas. After unloading, trucks would proceed in a clockwise direction to the exit weighbridge and perform a left-out at the southern driveway to exit the Site.

Employees would access the Site car park via a secure gate from the driveway between the truck entry and exit driveways, which would access the parking area for employees only. Forty car parking spaces will be available; 26 for office employees and 14 for staff working at the WTF. Parking includes one disabled parking space.

Traffic impacts will be managed in accordance with the Traffic Management Plan, provided in Appendix E of this OEMP.

5.5 Noise and Vibration

To support the preparation of the RtS the noise and vibration assessment carried out as part of the EIS (2021) was updated. The results of a noise assessment undertaken as part of the RtS indicated that operational noise emissions from the WTF would fully comply with the calculated Project Noise Trigger Level and the relevant noise criteria at the identified sensitive receivers under noise-enhancing meteorological conditions.

Potential traffic noise associated with truck movements generated during operation of the WTF was assessed as unlikely to have a perceivable effect on the existing noise sensitive receivers and complied with relevant noise targets at all assessment locations.

The nearest residential assessment locations are greater than 350m from the Site and the nearest commercial property is approximately 70m from the Site, with all other noise sensitive locations being greater than 300m from the Proposal Site. Operation at the Site is not anticipated to generate significant vibration impacts off site.



5.5.1 Noise and vibration mitigation measures

To ensure that the WTF is able to operate in compliance with the specific noise criteria identified in the EIS (2021), the following noise mitigation measures will be implemented.

- A Noise and Vibration Management Plan (ONVMP) will be prepared and will include the following:
 - Identification of the surrounding noise-sensitive land use.
 - A description of working hours and practices to minimise noise.
 - A list of high noise equipment or processes along with mitigation/minimising measures where possible.
 - A complaint register and written process for handling complaints.
- Plant and equipment will be selected and maintained to achieve the sound power levels outlined in the Noise Assessment (EIS, 2021).
- Plant and equipment will be maintained and not generate excessive noise.
- Broadband reversing alarms will be utilised in place of traditional beeper reversing alarms.
- Machinery will be operated in a manner that reduces maximum noise level events.
- Site awareness training / environmental inductions will include a section on noise mitigation techniques / measures to be implemented when on the Site.

Vibration impacts during operation were considered to be negligible and unlikely to have any potential impact on sensitive receivers. Nonetheless, details of control measures to minimise potential vibration impacts will be outlined in the ONVMP.

5.6 Air Quality

5.6.1 Operational air emissions

An Air Quality Impact Assessment (AQIA) was completed as part of the EIS (2021), with an addendum AQIA prepared to support the RtS for the Proposal in September 2022, which included a quantitative odour assessment. The maximum predicted ground level concentration of pollutants and individual toxic pollutants generated by WTF were each modelled outside the Site boundary at gridded sensitive receptors.

5.6.1.1 Particulate matter (PM)

The addendum AQIA prepared in 2022 determined the predicted 24-hour and annual PM₁₀ and PM_{2.5} concentrations (µg/m³) to be within the prescribed criteria from the NSW EPA *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (2022).

5.6.1.2 Metals and other pollutants

The addendum AQIA prepared in 2022 determined the predicted 1-hour 99th percentile concentrations (µg/m³) of Arsenic, Chromium and Lead to be well below the prescribed criteria from the NSW EPA *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (2022).

5.6.1.3 Odour

The AQIA states that the ventilation stacks serve as an air emissions control device that include filters to reduce particulate matter emissions and activated carbon to reduce emissions of VOCs and odour.

A quantitative odour assessment in addendum AQIA prepared in 2022 determined that all receptors are below the criterion.



5.6.2 Air quality mitigation measures

Particulate matter, VOC and odour emissions from the WTF will be mitigated using engineering controls (eg use of vents, sealed vessels, vapour recovery systems etc), as well as management controls including policies and procedures designed to reduce the generation of PM and VOC emissions. These include:

- No idling of mobile plant and haul trucks when not in use;
- Material loading/unloading and handling procedures will be designed to reduce fugitive dust emissions;
- High-speed roller-doors will be closed during material loading/unloading and handling;
- Emission control devices will be operated in accordance with manufacturer's specifications;
- Preventive maintenance of emissions control devices will be undertaken in accordance with manufacturer's specifications;
- A truck and wheel wash will be installed at the WTF exit to reduce soil track-out and generation of fugitive dust outside the building envelope;
- Fogging suppression systems may be installed if identified during detailed design. This potentially includes Compartment 3 and other areas as needed;
- HVAC control systems allowing a single stockpile bay hood to collect, and send for treatment, approximately 95% of the total air flow through the space above bays where waste is being discharged from the mobile high sheer mixer;
- Fabric side and front drop curtain to 4 metres will be installed on the Bioremediation Bays to contain minor contaminant generation from handling and turning process;
- Building compartments will be maintained at > -5 Pascals (Pa) while in 'daily treatment mode'. When in 'after hours mode', the building can exhaust air system from each compartment will be reduced and associated outside air inlet dampers closed off to maintain > -5 Pa whilst saving energy;
- Stack testing will be undertaken to validate manufacturers stated efficiencies.

An operational Air Quality Management Plan (OAQMP) will be prepared prior to operations commencing.

5.7 Soil and Water

The existing drainage system at the Site manages runoff from the carpark and roof areas and discharges into the Council's drainage network. A series of existing down pipes convey runoff from the warehouse and office roof into the existing 150 mm diameter drains. Part of this runoff and runoff from the carpark area is captured by grated stormwater pits and then is conveyed to the 375 mm diameter Council drain that runs along the eastern boundary of the Site. The rest of the warehouse runoff (from the eastern portion of the roof) is conveyed directly into the same Council drain.

During operation, it is proposed that part of the runoff from the warehouse roof will be captured in a rainwater storage tank to be used for onsite activities. Potential impacts on surface or groundwater water quality include:



- Wastewater contamination of surface water
- Spillage or uncontrolled releases of pollutants.

5.7.1 Water quality mitigation measures

The key design to protect water quality includes the segregation of clean stormwater from potentially contaminated materials and wastewater and protection of the groundwater through bunding, containment and barrier systems. Rainwater would be collected from the warehouse roof and will be reused during operations at the Site.

- All materials and process water are wholly contained within the bunded building and separate from stormwater (as a closed system)
- The storage and handling of materials always be undertaken inside the WTF building.
- The doorways of the building are bunded with drive-over bunding and of sufficient capacity to contain one tanker load of liquid
- Leachate will be collected within the WTF
- The floor of the WTF is concrete with centrally located collection pits so that all spills and contamination are contained within the building. Water collected is directed to the waste water treatment plant.
- Waste water treatment plant tanks are equipped with high level alarms etc to prevent overflow.
- Chemicals and dangerous goods will be stored in bunded areas in accordance with Australian Standards
- All tanks include overflow protection and alarms
- All treatment chemicals will be applied via enclosed automated dosing systems minimising the potential for spill
- All above-ground pre-treatment pits will be lined and regularly inspected and epoxy liner and concrete repair implemented as required
- All bunding will be inspected on a regular basis
- No WTF washdown will be undertaken in the building to minimise the generation of waste water
- Spill kits will be located adjacent to potentially contaminating activities
- All spills will be managed in accorded with the PIRMP and incident management procedures.

An operational Water Quality Management Plan (OWQMP) will be prepared prior to operations commencing.

5.8 Hazards

The WTF operations have the potential to contaminate land and water in and surrounding the Site area by the release of various chemicals stored and/or used on site. However, the operations of the WTF did not trigger the requirement for a PHA during preparation of the EIS, and operations are not considered to be potentially hazardous.

Regardless, a number of mitigation and management measures will be implemented to reduce the risk of hazardous substances escaping into the local waterways or soil.



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5.8.1 Hazards mitigation measures

As detailed in Section 5.7, the key design will include protection of surface and groundwater would be through bunding, containment and barrier systems. Additionally storage and handling of dangerous goods would be undertaken in the accordance with the relevant Australian Standards:

- Corrosive substances (Class 8) will be stored and handled in accordance with AS 3780-2008: *The storage and handling of corrosive substances*.
- Storage and handling of Class 5.1 oxidizing substances will be in accordance with AS 4326-2008: *The storage and handling of oxidizing agents*.

5.9 Human health

Source material would be primarily generated from industrial processes and contaminated sites. Treatment of these wastes will generally focus on the destruction of contaminants (eg chemical oxidation, bioremediation) or the separation of contaminants (eg screening, chemical separation) from recoverable or more inert constituents. Waste streams include organics, halogenated hydrocarbons metals and metalloids and other specific waste streams.

The health consequence of exposure to the various contaminants and hazards depends on:

- Dose of contaminant or level of hazard
- Toxicity or health effect of the contaminant or hazard
- Duration of exposure
- Sensitivity of the population exposed.

These factors are variable depending upon the individual characteristics of the contaminants or hazard, the exposure pathway. Other potential health hazards and potential impacts to human health include dust, noise and odour generated during operation.

5.9.1 Human health mitigation measures

Hi-Quality has an established comprehensive corporate health and safety management system which aligns with *AS/NZS ISO 45001:2018 Occupational Health and Safety Management Systems – Requirements with Guidance for use*.

During the first year of operation a competent, independent occupational hygienist will design a program for health and ambient monitoring for silica dust, dust and vapours. The program will be reviewed at the end of the first year and adjusted based on the outcome of the results and site observations.

Specific human health mitigation and management measures will include:

- Quarterly personal and ambient monitoring to verify that engineering controls are effective in controlling worker exposure to contaminants.
- Management of dermal contact and ingestion will be managed through standard personal hygiene practices, personal protective equipment, clothes change policy and the use of containerised plant, mobile plant and enclosed systems to minimise physical contact with the waste streams.
- Emergency showers and eyewash stations will be installed and maintained in accordance with AS4775, Emergency eyewash and shower equipment.
- A structured pre-employment medical and risk-based health surveillance program will be implemented



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- Signage will identify process areas, key hazards and protective equipment requirements.

5.9.2 Human health training and inductions

All employees will be required to complete the Proponent's onboarding and induction system that includes health and safety training.

- Task based training will be provided and include a competency assessment process with personnel not being permitted to work unsupervised until deemed competent.
- Ongoing education and awareness will be provided through the health & safety committee, personal monitoring result discussions, safety alerts and toolbox meetings.

The induction will include the following key health related elements:

- Dangerous Goods (storage, handling and use)
- Contaminants (eg asbestos, PAHs, dust, vapours)
- Use and maintenance of personal protective equipment
- Personal hygiene and clothes change policy
- Incidents and first response
- Personal decontamination (safety showers)
- Spill Response
- Site Critical Controls
- Workplace Monitoring.

5.10 Water usage

Potable water usage for the WTF and ancillary facilities is anticipated to be around 126.12 kL/year. This covers the water usage required for the kitchen and ablution facilities.

Total water usage for process applications and dust suppression is estimated be around 4,000 kL/year. This includes:

- 1,000 kL/year for dust suppression and moisture conditions
- 2,500 kL/year for wheel wash and truck wash activities
- 500 kL/ year for bioremediation

Rainwater will be harvested from the WTF roof and will be used for process applications, dust suppression and wheel and truck wash

5.11 Other environmental issues

The EIS also identified environmental issues with low to very low level of risk. These have been summarised in **Table 5-3** and mitigation measures provided to minimise any potential impact arising through operation of the WTF.

Table 5-3: Other low risk environmental impacts

Aspect	Description	Mitigation Measures
Biodiversity	The WTF is located within an existing industrial area and is not identified in the Liverpool Local Environment Plan 2008(LEP) as containing biodiversity values	Maintain minimum speed limit Keep bins covered to reduce the likelihood of animal scavenging



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Aspect	Description	Mitigation Measures
	The Flora and Fauna assessment, undertaken for the EIS confirmed that the operation of the WTF would not have a significant impact on biodiversity.	Unexpected finds protocol should excavation be required
Cultural Heritage	The WTF is within an existing industrial area and consists of buildings and infrastructure, concrete drives and parking and landscaped area. During operation, the WTF will have negligible ground disturbance / excavation.	In the unlikely event that Aboriginal or suspected Aboriginal archaeological material is uncovered during excavations, then works in that area are to stop and the area cordoned off. The Site Manager/ Environmental Manager will contact DPE or other regulatory body to make an assessment as to whether the material is classed as Aboriginal object/s under the <i>National Parks and Wildlife Act 1974</i> and advise on the required management and mitigation measures. Works are not to re-commence in the cordoned off area until heritage clearance has been given and/or the required management and mitigation measures have been implemented
Visual	The WTF is predominantly screened by other buildings in adjacent properties to the north, east and south. The Site has a 10-metre setback to the primary frontage of Whyalla Place in accordance with <i>Liverpool City Council DCP 2008</i> . This setback area includes onsite vegetation. Whyalla Place was assessed as having low visual sensitivity and low visual effect due to being located within an existing heavy industrial area with typical traffic volumes and similar industrial land uses and the WTF will have negligible visual impacts on the surrounding area.	Maintain site vegetation Keep the site neat and tidy and clear of litter
Bushfire	The WTF is located within an existing industrial estate that is not identified as being bushfire prone land. Fire management will be predominantly undertaken within existing buildings	Appropriate fire management procedures Emergency response plan Maintenance of vegetation



6 MONITORING AND REVIEW

6.1 Inspections and Monitoring

Regular monitoring will be undertaken to monitor the performance of the environmental aspects outlined in **Section 5**. These will be through a series of formal and informal inspections at regular intervals.

6.1.1 Environmental Inspections

The Environmental Manager will undertake monthly environmental inspections of the Site using the Hi-Quality Environmental Checklist.

Any non-conformances will be recorded, and action plans or improvement plans developed. Action and/or improvement plans will be recorded within Hi-Quality Rapid system with tasks/actions and timeframe for completion assigned to a relevant employee for close out and completion.

6.1.2 Environmental Monitoring

The Conditions of Consent and the EPL will identify monitoring regimes which will need to be complied with. This Section will be updated following the the Approval of the Project. The Environmental Manager will undertake the relevant monitoring requirements.

6.2 Auditing

6.2.1 Internal audits

Internal audits will be undertaken to assess the effectiveness of environmental controls and compliance with this Plan and other relevant guidelines. The following elements may be included in the audit of the overall OEMP:

- Compliance with statutory obligations
- Compliance with standards, guidelines, specifications and contract conditions
- Compliance with the OEMP and PIRMP
- Adequacy of monitoring and operational reports
- Completion of environmental actions
- Adequacy of environmental training records
- Adequacy of environmental records, checklists and document management systems
- Preparation of environmental reports
- Recording and completion of corrective actions following environmental incidents and complaint
- Achievement of environmental performance objectives, and
- Implementation of actions from previous audits.

6.2.2 Independent Environmental Audit

Independent external audits will be undertaken to assess the effectiveness of environmental controls and compliance with the Conditions of Consent. Condition **XX** outlines the requirements for independent environmental auditing and compliance reporting.

An Independent Environmental Audit will likely be required within the first year of operation of the WTF, and every three years thereafter, unless the DPE directs otherwise. The Independent Environmental audit of the Facility will be commissioned and paid by Hi-Quality.



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The audit team will be led by a suitably qualified auditor and will include relevant experts whose appointment has been endorsed by the DPE.

The audit report will be submitted to the DPE, together with its response to any recommendations contained in the report including a timetable for implementation of the recommendations within three months of commissioning the Independent Environmental audit.

6.3 Non-Conformance, Non-Compliances and Actions

A non-conformance occurs when a procedure or environmental safeguard is not followed or does not perform as required by this OEMP. The Environmental Manager (or delegate) will monitor non-conformances with the OEMP and initiate a corrective and preventative action where required. Non-conformance is reported using the Non-Conformance Report in Hi-Quality's Management System (RAPID).

Non-conformances will be reported to the Site Manager within 24 hours of the non-conformance being detected. Details of the remedial action will be reported within one working day of completion of the remedial action. The Safety, Health and Environment electronic online Incident Report in the Hi Quality Management System (ref: RAPID) will be used to document the investigation and implementation of preventative actions.

Minor non-compliances, which can be remedied immediately, will be recorded together with the appropriate remedial action in the weekly environmental checklist. A copy of the checklist will be issued monthly to the General Manager.

In the event of a non-conformance presenting potential or actual harm to the environment, the non-conforming practice must cease immediately, the Site Manager must be promptly notified, and remedial and corrective actions implemented to prevent reoccurrence.

6.4 Reporting

Compliance reporting is required to produce systematic, comprehensive and informative reports on the environmental performance of the WTF operations and in line with relevant legislative requirements. The reports required are summarised in **Table 6-1**. Reporting requirements that relate to specific environmental aspects are included in the relevant sub-plans (**Appendices C-E**).

[These reports are based on current experience with waste projects. The table will be updated once the conditions of consent are issued and reporting requirements identified]

Table 6-1: Reporting Requirements

Item	Reporting Requirements	Frequency	Responsible
Conditions of consent	Annual Review	Within 12 months from the commencement of operation, and each year thereafter or otherwise agreed by the Secretary	Environmental Manager
Conditions of consent	Incident Report	Within 24 hours days of the date of any incident or potential incident with actual or potential significant off-site impacts	Environmental Manager General Manager
Conditions of consent	Detailed Incident Report	No later than 14 days after incident or potential incident	Environmental Manager



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Item	Reporting Requirements	Frequency	Responsible
Conditions of consent	Independent Environmental Audit Report	Within three months of commissioning audit, or as otherwise agreed by the Secretary	Auditor Environmental Manager
EPL	Annual Return	Within 60 days after the end of each reporting period (12 months after the issue of the licence, and each subsequent period of 12 months)	Environmental Manager

6.4.1 Internal reporting and record keeping

Table 6-2: Internal reporting requirements

Subject	Action	Responsible	Frequency
EMP	Distribute to Site Manager and EPA	Environmental Manager	Commencement of operations
Site Inspection	Record in Environmental Observations and Actions Checklist (Appendix B)	Site Manager	Weekly
Complaints	Record details (refer to Section 4.5)	Site Manager	As required
Complaints Response	Record details	Site Manager	As required
Non-Conformance	Issue notice to Environmental Manager	Site Manager	Immediately
Notification of Environmental Harm	Report to Environmental Manager and EPA (phone 131 555)	Site Manager	Immediately
	Report to NSW EPA in writing via info@epa.nsw.gov.au (Refer to Section 4.8.2)	Environmental Manager	Within 2 working days
Audit	Report audit findings and distribute to Site Manager	Environmental Manager	Annually
OEMP Review	Meeting minutes	Environmental Manager	Annually

The following records will be maintained for record-keeping purposes:

- The OEMP (current and superseded versions)
- Employee training and induction records
- Site inspection reports



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- Maintenance and repair records performed on pollution control equipment (for a period of 2 years as per the conditions of approval)
- Waste disposal certificates for any regulated or controlled wastes disposed off-site (for a period of 1 year as per the conditions of approval)
- Records of VENM accepted at the site (for a period of 2 years as per the conditions of approval), including, material source, type, quantity, who delivered the material, certification of material and EPA approval number where applicable
- Weighbridge dockets (incoming and outgoing materials)
- Environmental monitoring records
- Monitoring equipment calibration reports
- Environmental incidents/emergencies reports
- Non-conformance reports
- Complaints register
- Audit reports
- OEMP review minutes
- Regulatory authority inspection reports and correspondence with regulatory authorities.

6.5 OEMP Annual Review

The OEMP will be annually to ensure the ongoing suitability, adequacy and effectiveness of the OEMP. Management reviews will include assessing opportunities for improvement and the need for changes to the OEMP, including the operational controls and frequency of monitoring.

- Communications and complaints from interested parties
- Status of implementation of corrective and preventative actions
- Action items from previous management reviews
- Changing circumstances including developments in legislative and other requirements related to operations at the site
- Recommendations for improvements.

Outputs from management reviews will include decisions and actions related to possible changes to the OEMP which can result in (and is consistent with) continual improvement.

6.6 Contingency Planning

If an exceedance of an environmental criterion is considered to have occurred, the following Contingency Plan will be implemented:

- The Environmental Manager will review the incident to determine the cause of the incident, immediate actions required to manage the incident and the potential improvement plan that may be applied
- The observation will be reported to the Environmental Manager and Group General Manager within 24 hours
- The observation will be recorded by the Environmental Manager
- The Environmental Manager will report the incident to the EPA, if required under the requirements conditions of approval
- Hi-Quality will apply adaptive management to support any improvement plans formulated



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- Depending on the nature and severity of the exceedance and any potential impacts to the environment and local residences, Hi-Quality may temporarily suspend its operations (or part thereof) which are deemed to be contributing to the exceedance pending an internal investigation
- Hi-Quality will assess the exceedances, modify its operations and implement safety measures in accordance with the relevant Management Plan/s; The Environmental Manager will investigate any potential contributing factors and identify an appropriate action plan to manage the identified impact(s), in consultation with specialists and/or relevant agencies, if necessary
- Hi-Quality will identify the appropriate course of action with respect to the identified impact(s), in consultation with any required technical specialists, any relevant agencies, as necessary
- Hi-Quality will implement the appropriate course of action to the satisfaction of all stakeholders
- Hi-Quality will continue to monitor performance with the new action plan in place and, if successful will formalise these actions as part of the Management Plan.

Contingency measures will be developed in consideration of the specific circumstances of the issue and the assessment of consequences. Modification or suspension of operations would include such actions ranging from increasing the frequency or route of the water cart to reduce dust in particular problem areas, to temporarily ceasing operations or part thereof. This would be dependent on the nature, severity and potential impact on residences and the environment of the exceedance or potential exceedance.

6.7 Adaptive Management

Hi-Quality will assess and manage risks to comply with the criteria and/or performance measures outlined within the conditions of approval. Where any exceedance of these criteria and/or performance measures occurs, at the earliest opportunity, Hi-Quality will:

- Take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur
- Consider all reasonable and feasible options for remediation
- Implement remediation measures.

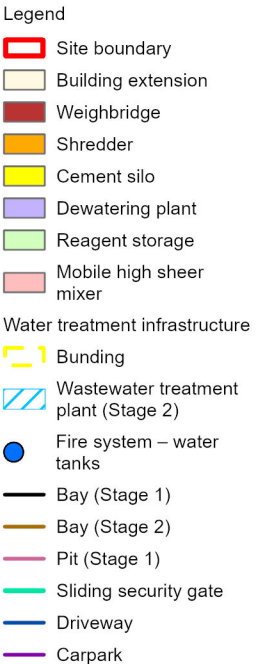


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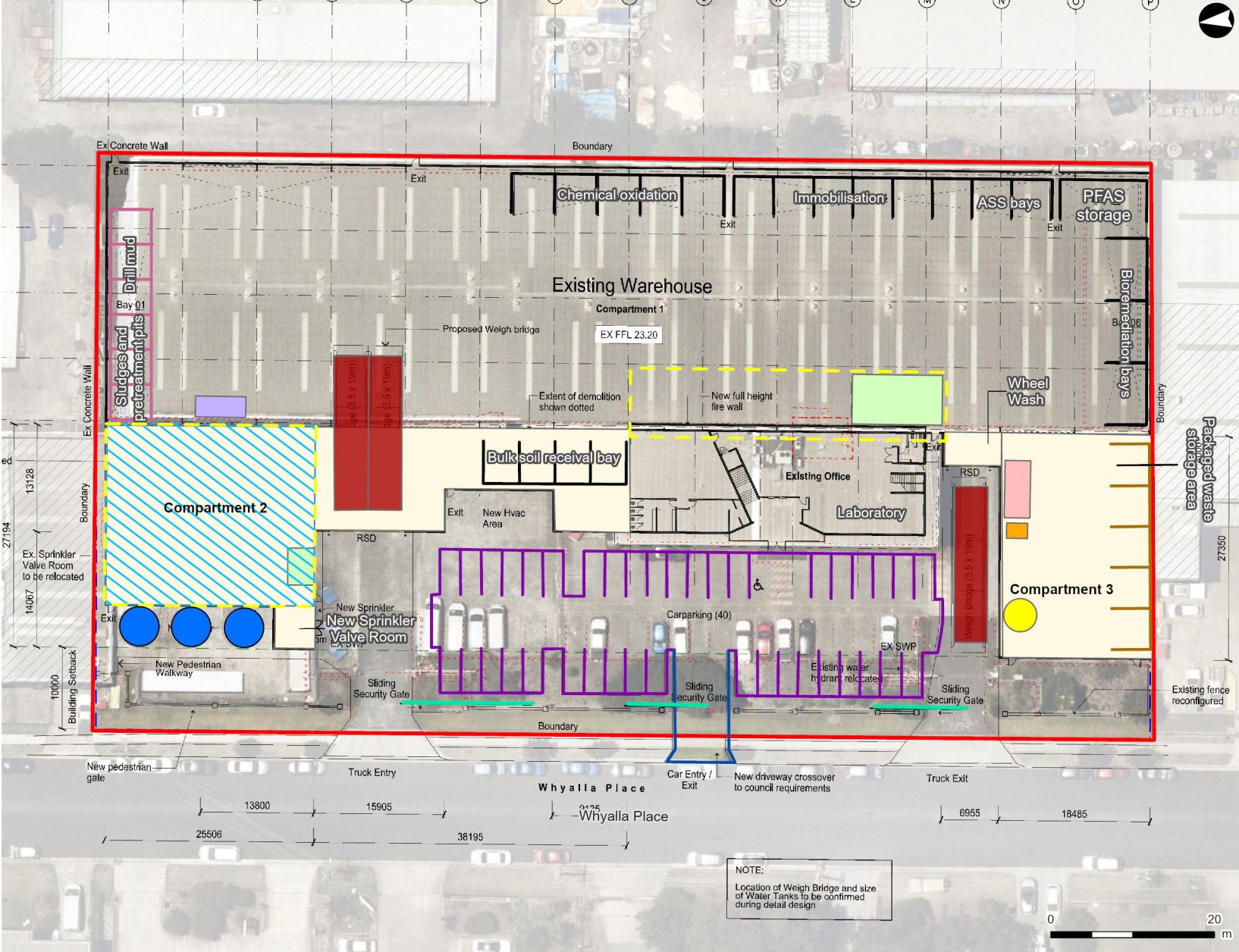
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APPENDIX A SITE LAYOUT

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-  Bunding
-  Wastewater treatment plant (Stage 2)
-  Fire system – water tanks
-  Bay (Stage 1)
-  Bay (Stage 2)
-  Pit (Stage 1)
-  Sliding security gate
-  Driveway
-  Carpark



NOTE:
Location of Weigh Bridge and size of Water Tanks to be confirmed during detail design



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APPENDIX B ENVIRONMENTAL OBSERVATIONS AND ACTIONS CHECKLIST

Site:	
Inspected By:	
Date:	

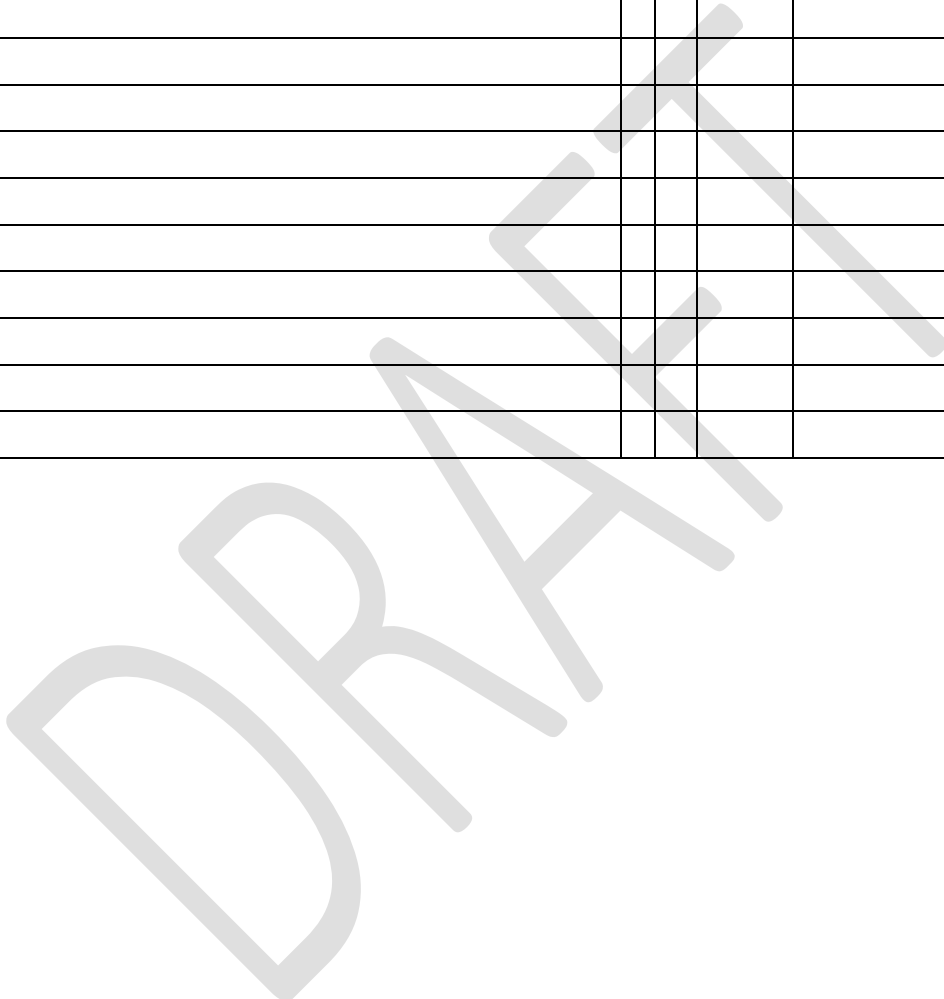
<i>Legend – Record in Results Column</i>	<i>S Column - ✓ = Standard meet</i>	<i>A Column - X = action required</i>	<i>N/A Column = Not applicable</i>
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Inductions	S	A	N/A	COMMENTS
All site personnel inducted				
All contractors inducted and supplied insurances/WMS				
Toolbox meetings conducted				
Building & Structures	S	A	N/A	COMMENTS
Floors in good condition				
Lighting Adequate				
Ventilation - Air Flow				
Amenities - clean and hygienic				
Emergency – Exits Identified and sign posted in office/weighbridge				
Mechanical Safeguarding	S	A	N/A	COMMENTS
Machine guarding – complies with appropriate standards				
Lock-out System and Usage Tags/locks available				
Switches, Isolators, Valves & Controls - Labelled				
Ladders, Handrails and Walkways comply with standards				
Lifting Gear and Machinery Identified and on register				
Regular inspections				
Conveyor - Gears, pulley, shaft and nip points guarded				
Emergency stop				
Lanyards on all conveyors				

Fire Safety	S	A	N/A	COMMENTS
Access to fire equipment				
Access to exits				
Extinguishers/reels inspected and in test date				
Appropriate fire equipment				
Signage				
Training of personnel				
Electrical Safety	S	A	N/A	COMMENTS
Switchboards secured				
Switchboards signage				
Test and tagging in date				
Power points and plugs				
Danger tag and lock out system in place				
RCD units tested				
Equipment Safety	S	A	N/A	COMMENTS
Guards and e-stops				
Storage of tools/equipment				
Pressure vessels in test				
Oxy acetylene cylinders				
Welders VCRs installed				
Compressors in test				
Equipment signage/labelling				
Emergency Provisions	S	A	N/A	COMMENTS
First aid kits				
Qualified first aid person on site				
Emergency eye wash				
Emergency contacts available and displayed				
Relevant signage in place				
Personnel trained				
Incident/accident report forms available and used				
Hazard report forms available and used				
Hazardous Substances	S	A	N/A	COMMENTS
Register available and used				
Products labelled correctly				
Safety Data Sheets- available & in date (Valid for 5 years)				
Stored appropriately, banded & containment				
Segregation distances				
Gas Cylinders and Pressure Vessels	S	A	N/A	COMMENTS
Pressure Vessels – register available				

Inspections/tests to standard and labelled				
Relief (safety) valve operational				
Drained & free of moisture				
Gas Cylinders - Cylinders correctly stored				
Segregation distance				
Correct flashback arrestors used				
Mobile Plant & Machines	S	A	N/A	COMMENTS
Daily Pre-Start completed				
Operator competent				
Seat belts				
ROP's, FOP's, TOP's in place				
Overhead guards where applicable				
Fire Extinguishers				
Flashing light/reversing alarm				
Maintenance records				
Isolated when unattended				
Cranes/Hoists				
Storage	S	A	N/A	COMMENTS
Clean storage areas				
Relevant signage				
Organisation				
Storage shelves				
Dangerous goods				
Storage – adequate				
General	S	A	N/A	COMMENTS
Work areas clean				
Adequate lighting				
Waste bins				
Ventilation				
Ground conditions				
Signage				
Toilets	S	A	N/A	COMMENTS
Walls, floors, doors, windows				
Toilet bowls and seats				
Urinal				
Toilet rolls & dispensers				
Soap				
Lunchroom	S	A	N/A	COMMENTS
Sink				

Benches/Tables				
Cleaning equipment				
Bins lids available				
Fridge clean				
Cooking equipment				
Lights switches and sockets				
Ventilation				
Fire equipment				
Access Road	S	A	N/A	COMMENTS
Wide enough for vehicles				
Adequate passing areas				
Graded surface, no spillage, potholes (Camber 2-3%)				
Signage -Access to site adequately sign posted -Speed limits				
Roads Ramps Dumps	S	A	N/A	COMMENTS
Go Line				
Graded and free of obstructions				
Vehicles parked at safe distance apart				
Windrows Axle height of the largest wheeled vehicle				
Sufficiently wide enough to stop vehicle				
Delineators clearly visible and reflectors clean				
Surface - Adequate width, passing area				
Well graded and free of spillage and potholes				
No signs of cracking or collapse of edges				
Dust suppression				
Traffic movement in accordance to procedures				
Camber 2-3% Less than 10:1 gradient				
Open Pit	S	A	N/A	COMMENTS
Walls designed angle				
No Cracks or over hangs				
No loose material				
Access ramp away from working face				
Berms adequate within ratio to wall height				
Drainage away from pit surrounds				
Environmental	S	A	N/A	COMMENTS
Water cart operational to minimise dust				
Water sprays operational to minimise dust				
Site wheel wash operational				
Other site dust controls operational				
Oil stored in bunded area				



Sign Off			
Person undertaking inspection			
Print Name	Signature		
Findings/actions arising from this report have submitted to:	Print Name	Position Title	Signature



APPENDIX C INCIDENT AND EMERGENCY RESPONSE

Emergency Preparedness and Response

In the event of an emergency, the safety of people shall always be the FIRST PRIORITY. In the event of an emergency, the procedures and instructions contained in the Emergency Plan will be adhered to.

Steps to be followed include:

- Check personnel safety and attend to any injured personnel so far as is required to prevent further injury, provided no other person is put at risk in the process
- All personnel on site shall be alerted to emergencies by verbal command and directed to an assigned muster or assembly point
- Once emergency services have been notified, site personnel shall, at the earliest opportunity, contact the relevant other parties to report the incident and determine the appropriate course of action.

Environmental Incidents

Pollution and environmental damage can arise from emergency incidents such as:

- Spillages of dangerous goods, chemicals, fuel and oils
- Unlicensed discharge of pollutants to environment (air, water, noise, soil)
- Structural collapse
- Traffic accidents
- Vandalism, arson and theft
- Explosions and natural disasters – e.g. flood and fire.

All environmental incidents will be dealt with promptly to reduce any potential impacts.

The incident Response Process will be in accordance with the PIRMP.

The NSW EPA and relevant emergency services (as required) will be notified immediately after the person becomes aware of the incident (and is safe to do so), a written report of the notification will be submitted within seven days of the incident occurring.

Spills Response

Spills on the site are most likely to involve fuel, hydraulic oil, engine oil spilled from plant items, though potentially paint and solvents may also be present.

If a spill occurs, the following procedure is to be followed:

- All work to cease in the affected area
- Check personnel safety
- Immediately identify the spilled material and notify the Site Manager. A Register and Safety Data Sheet (SDS) is kept for all hazardous substances kept at the workplace. Spill Kits are kept at construction sites near chemical storage areas, bunded and refuelling areas, high trafficked areas, etc; and
- Any incidents on site which are likely to cause material harm to the environment are to be immediately reported to the Site Manager.

Fire Event

In the event of a fire, the following procedure is to be followed:

- Alert persons nearby and request for help
- Raise the alarm
- Summon the Site Manager
- Fight the fire only if it is safe to do so
- Evacuate if necessary – using the nearest safe exit
- Assemble at the relevant muster point in your area
- Await further instructions.

Flood Event

In the event of a flood, the following procedure is to be followed:

- Establish access to up to date and credible information
- Alert and connect with staff
- Conduct an incident assessment and assess the potential for impact to the facility
- Evacuate if necessary – using the nearest safe exit
- Assemble at the relevant muster point in your area
- Await further instructions.

Evacuation

If an evacuation alarm sounds and/or there is an announcement on the site wide UHF radio, evacuate the area immediately:

- Follow the instructions given and walk calmly to the nearest assembly area relevant to your work area – refer to the Emergency Management Diagrams located on site
- Do not leave the assembly area unless requested to do so; and
- A first aid station will be set up at each assembly area to anyone requiring treatment.

APPENDIX D UNEXPECTED FINDS MANAGEMENT PLAN

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**PRESTONS
WASTE TREATMENT FACILITY
UNEXPECTED FINDS MANAGEMENT
PLAN**

HI-QUALITY GROUP

HI-QUALITY GROUP
UNEXPECTED FINDS MANAGEMENT PLAN



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1 INTRODUCTION

This Unexpected Finds Management Plan (UFMP) has been prepared for the Hi-Quality Waste Treatment Services Pty Ltd (Hi-Quality) Prestons (Prestons Facility) at 9-13 Whyalla Place, Prestons NSW.

The Prestons Facility is not licensed to accept and receive asbestos waste and the intent of this UFMP is to provide guidance on the management of the unexpected finds at the Prestons Facility.

1.1 Objectives and Scope

The objectives of this UFMP are to detail the actions to be taken when material that is not licenced to be received at the Prestons Facility, including potentially asbestos contaminated soil and/or asbestos containing material, is encountered during the operation of the facility. In the event that unexpected contamination, including asbestos contaminated soil and/or asbestos containing material are discovered, this plan should be implemented.

The UFMP is applicable to all activities conducted by site personnel (including sub-contractors) at the facility that have the potential to uncover/encounter unexpected, contaminated material, asbestos contaminated soil and/or asbestos containing material.

2 ASBESTOS RISK MANAGEMENT

2.1 Asbestos Risk Profile

Asbestos is a naturally occurring mineral fibre that withstands heat, erosion and decay, and has fire and water resistant properties.

Asbestos has been used in the manufacture of building and insulation materials, brake linings in motor vehicles, and gaskets for some appliances. Australian manufacturers of building products gradually removed asbestos from their products in the 1980s. The manufacture and supply of all asbestos-containing materials was prohibited from 31 December 2003.

Asbestos is a known carcinogen. Asbestos becomes a hazard when microscopic fibre fragments become airborne and are inhaled. Due to their size and shape they can remain airborne for some time and enter even the smallest air passages in the lungs where they embed in lung tissue. The fibres are highly resistant to removal by the lungs' natural cleaning processes. Embedded asbestos fibres irritate the lung tissue around them, causing a number of diseases including mesothelioma, lung cancer and asbestosis.

Asbestos can cause health effects if fibres are breathed into the lungs.

The possible health effects of asbestos include:

- Asbestosis
- Lung cancer
- Mesothelioma; and
- Benign pleural disease.

2.2 Asbestos Risk Assessment

The SafeWork Australia Code of Practice advises that if:

"asbestos-containing material (excluding naturally occurring asbestos) is in good condition and left undisturbed, it is unlikely that airborne asbestos will be released into the air and the risk to health is extremely low. It is usually safer to leave it and review its condition over time. However, if the asbestos-containing material has deteriorated, has been disturbed, or if asbestos-contaminated dust is present, the likelihood that airborne asbestos will be released into the air is increased".

The type of material that binds asbestos fibres will influence the potential for airborne asbestos to be released into the air from different asbestos-containing materials, with loosely bound sprayed coating being more likely to release fibres when disturbed than asbestos cement that is in good condition, and in which fibres are firmly bound.

Figure 1 ranks different types of asbestos according to the likelihood that airborne asbestos can be released into the air if it has deteriorated or been disturbed. The potential risk to health is greater for items higher up the list if people are exposed to airborne asbestos, but any of the materials listed can produce asbestos fibres if they are disturbed.

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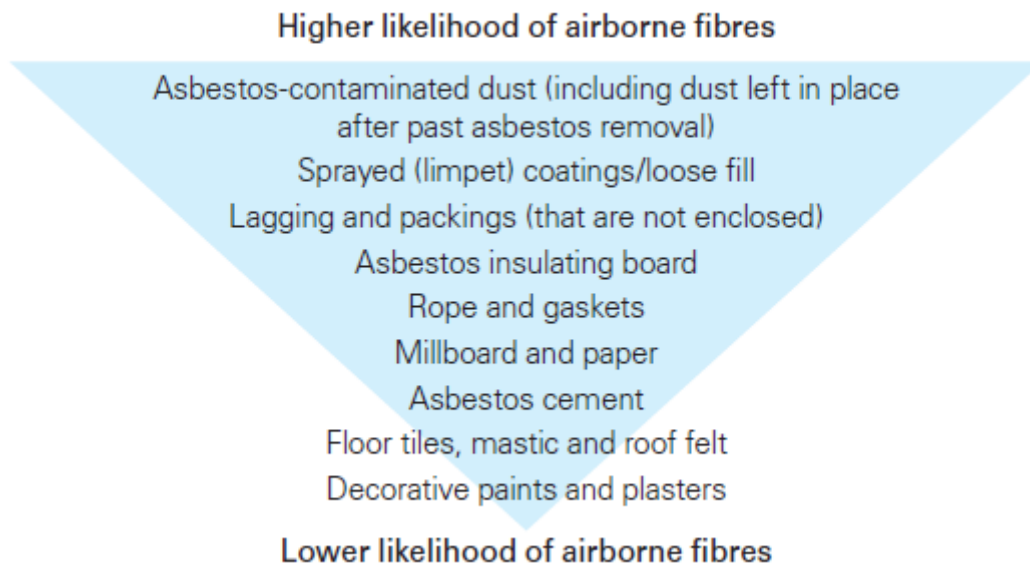


Figure 1. Likelihood of Airborne Fibres

Health risk from asbestos containing materials only occurs from airborne asbestos fibres. If asbestos containing materials is undisturbed and there are no fibres being released from these materials, there is no actual risk is posed.

Materials which contain loose fibres have a high potential to become airborne when disturbed.

Asbestos removal or remediation work may only be carried out by a contractor holding a Class A (friable) asbestos removal licence or a Class B (non-friable) asbestos removal licence.

No asbestos removal licence is required to:

- Remove less than 10 square metres of non-friable asbestos
- Asbestos containing dust or debris (ACD) that is associated with the removal of less than 10 square metres of non-friable asbestos
- Minor asbestos contamination not associated with the removal of friable or non-friable asbestos.

All work health and safety documentation such as Safe Work Method Statements (SWMS), Job Safety Environmental Analyses (JSEA), Job Hazard Analysis (JHA) and Site Hazard Identification are to be prepared with consideration to the controls and procedures outlined within this AMP.

3 DEFINITIONS

The following definitions are used within this AMP:

Airborne asbestos means any fibres of asbestos small enough to be made airborne. For the purposes of monitoring airborne asbestos fibres, only respirable fibres are counted.

Asbestos means the asbestiform varieties of mineral silicates belonging to the serpentine or amphibole groups of rock-forming minerals, including actinolite asbestos, grunerite (or amosite) asbestos (brown), anthophyllite asbestos, chrysotile asbestos (white), crocidolite asbestos (blue) and tremolite asbestos.

Asbestos containing material (ACM) means any material or thing that, as part of its design, contains asbestos.

Asbestos-contaminated dust or debris (ACD) means dust or debris that has settled within a workplace and is (or assumed to be) contaminated with asbestos.

Asbestos fines or fibres (AF) include small asbestos fibre bundles and free asbestos fibres.

Asbestos removal work means:

- Work involving the removal of asbestos or ACM
- Class A asbestos removal work or Class B asbestos removal work.

Competent person means a person who has acquired, through training, qualification or experience, the knowledge and skills to carry out the task.

Fibrous asbestos (FA) includes friable asbestos material, such as severely weathered ACM and asbestos in the form of loose fibrous material such as insulation products. Friable asbestos is material that is in a degraded condition such that it can be broken or crumbled to a powder form by hand pressure.

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Friable asbestos means material that is in a powder form or that can be crumbled, pulverised or reduced to a powder by hand pressure when dry, and contains asbestos.

Non-friable asbestos or bonded asbestos means material containing asbestos that is not friable asbestos, including material containing asbestos fibres reinforced with a bonding compound.

Unexpected, contaminated material includes material that does not match the characterisation of the waste as per the Acceptance Letter and /or the analytical results provided for the batch of waste.

4 REGULATORY REQUIREMENTS

The following legislation, regulation and guidelines are relevant to this UFMP:

- *Work Health and Safety Act 2011*
- *Work Health and Safety (WHS) Regulation 2017*
- *Protection of the Environment Operations Act 1997*
- *Protection of the Environment Operations (Waste) Regulation 2014.*

4.1 Guidelines

- NSW EPA (2014) *Waste Classification Guidelines*
- Code of Practice: How to Safely Remove Asbestos (SafeWork NSW, 2019)
- Code of Practice for How to Safely Remove Asbestos - Safe Work Australia (2011)
- Code of Practice for How to Manage and Control Asbestos in the Workplace -Safe Work Australia (2011)
- Managing asbestos in or on soil – Safe Work Australia 2014.

5 FACILITY ENVIRONMENTAL MANAGEMENT PLAN

The Prestons Facility is guided by an Environmental Management Plan (EMP) which was prepared by Hi-Quality following the granting of the development consent and issue of the EPA Licence.

The EMP identifies the operating and management procedures for Prestons Facility. The EMP has been prepared to provide easily assessable information concerning the procedures established, to control environmental emissions and to ensure efficient site operation.

The prime objective of the EMP is to document and implement the control procedures for:

- Discharges to ground and surface water
- Atmospheric emissions (air pollution)
- Land management and conservation
- Hazards and loss of amenity.

5.1 Asbestos Register

In addition to the management of risks associated with asbestos waste being handled at the Prestons Facility, a survey of the site buildings has been undertaken to identify any asbestos materials located on the premises.

The asbestos register contains the following information:

- Records any asbestos or ACM identified at the workplace or likely to be present at the workplace
- Date on which the asbestos or ACM was identified; and
- Location, type and condition of the asbestos or ACM.

A copy of the Asbestos Register is available for inspection at the Site Manager's office.

The Site Manager will ensure that any worker or contractor that proposes to undertake work on the site buildings is made aware of and consults the Asbestos Register before any work is conducted.

5.2 Unexpected Finds Management Plan (UFMP)

An UFMP is the reference document that reflects the management procedures for unexpected contamination management, asbestos waste receipt, disposal and reporting at the Prestons Facility and includes:

- Identification of asbestos or ACM within existing buildings, such as, the Asbestos Register
- Identification of unexpected contamination, including asbestos, ACM or ACD within material received at the Site
- Procedures for detailing incidents or emergencies involving unexpected, contamination including asbestos or ACM at the Site
- Standard Operational Procedures (SOPs) and management practices setting out the measures to be adopted in relation to the control of asbestos during the receipt and disposal process
- Identification of responsibilities under the UFMP; and
- Details of compliance and performance audits to be undertaken and periodic reviews of the plan with feedback mechanisms and improvement.

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The UFMP will be available for inspection at the workplace and be readily accessible to:

- A worker who has carried out, carries out or intends to carry out, work at the workplace
- A health and safety representative who represents a worker
- A person conducting a business or undertaking who has carried out, carries out or intends to carry out, work at the workplace; and
- A person conducting a business or undertaking who has required, requires, or intends to require work to be carried out at the workplace.

This UFMP forms part of the wider Hi-Quality Environmental Management System (EMS).

5.3 Training

All site personnel are required to undertake asbestos awareness training by a certified registered training organisation accredited by SafeWork ensuring that they have been given appropriate occupational health and safety training in relation to asbestos, asbestos awareness training and training in the identification of ACM which may be encountered during their work and the safe removal of non-friable asbestos and appropriate PPE. Site personnel will also undertake training in the identification and management of unexpected contamination.

Training may include:

- Types and likely presence of asbestos that may be encountered
- Identification of unexpected contamination
- Roles and responsibilities under the UFMP
- Processes and safe work procedures to be followed to prevent exposure, including exposure from any accidental release of airborne asbestos where applicable, the correct use of PPE including respiratory protective equipment (RPE)
- The implementation of control measures and safe work methods to eliminate or minimise the risks associated with asbestos to limit the exposure to workers and other persons
- Exposure standard and control levels for asbestos, and
- Purpose of any exposure monitoring or health monitoring that may occur.

All associated training records will be kept readily available on site.

Site personnel and contractors are required to adhere to outcomes of toolbox talks, work directions and procedural documents such as SWMS, JSEAs and JHA that are developed to manage task specific hazards.

6 ROLES AND RESPONSIBILITIES

The roles and responsibilities under this UFMP for the site employees are outlined within this section.

Role/s	Responsibilities
Executive Management ▪ Managing Director ▪ Group General Manager ▪ SHEQ Compliance Manager	▪ Acquire Knowledge and Keep up to date with work health and safety (WHS) matters. ▪ Understand the nature of the operations and the associated hazards and risks. ▪ Ensure there are appropriate resources and processes to ensure that hazards are identified, and risks are eliminated or mitigated. ▪ Ensure there are processes for receiving and considering information about incidents, hazards and risks in a timely way. ▪ Ensure there are processes for compliance. ▪ Verify the provision and use of resources and processes. ▪ Ensure costumers are aware of and comply with Hi Quality acceptance criteria.
Management of Workplace ▪ Site Manager ▪ Supervisor	▪ Be familiar with Hi-Quality environmental, health and safety policy to ensure awareness of personal responsibility for work health and safety within areas of authority and influence. ▪ Ensure the health, safety and wellbeing of staff and affiliates and ensure that risks relating to all activities undertaken are properly identified, assessed and controlled. ▪ Demonstrate active and visible leadership in asbestos risk management. ▪ Set goals to maintain and improve asbestos risk management and health and safety in general. ▪ Ensure that asbestos hazards or WHS risks associated with different jobs, tasks and projects are being formally identified and assessed for risks to the health and safety of those involved. ▪ Ensure that suitable risks controls are chosen and established within agreed timeframes. ▪ Inform staff, affiliates and contractors of asbestos management risks, safety requirements and expectations through on-the-job instruction and specific training.
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	▪ Include WHS as a key performance indicator in all position descriptions and performance reviews. ▪ Develop, review and facilitate the implementation of the Safe Work Method Statements (SWMS). ▪ Participate in the review and update of the UFMP. ▪ Ensure the appropriate PPE is available to all workers. ▪ Ensure that the current UFMP is available to staff. ▪ Ensure all employees receive appropriate training at least annually or as otherwise deemed appropriate. ▪ Conduct spot checks on competency of all employees at random intervals. ▪ Ensure an asbestos survey is prepared, maintained and is accessible at Hi-Quality Prestons Facility premises. ▪ Ensure all unexpected finds are identified and relevant procedures are followed. ▪ Conduct toolbox talks. ▪ Identifying or assuming asbestos or ACM and unexpected contamination ▪ Ensure if there is uncertainty as to whether asbestos is present, assume asbestos is present unless sampled and tested by a competent person. Asbestos Register: ▪ Ensure handover of the asbestos register with change of management. Unexpected Finds Management Plan: ▪ Ensure this UFMP is prepared, maintained, reviewed and kept at the workplace. It must be accessible to workers, health and safety representatives, regulators and other relevant persons.
Suitable Competent Person Independent Licensed Asbestos Assessor	▪ Provide training on the identification and management of ACM and unexpected contamination finds and the proper use, wearing, storage and maintenance of personal protective equipment (PPE). ▪ Inspect and /or sample unexpected finds for ACM as requested by the Site Manager / Supervisor, in accordance with EPA guidelines and SafeWork NSW requirements ▪ Inform the Site Manager of the need for air quality monitoring and a licensed asbestos assessor to undertake the asbestos removal work, if required ▪ Confirm all workers involved in asbestos removal work are appropriately trained ▪ Notify SafeWork NSW immediately by telephone if licensed asbestos work is to be undertaken and within 24 hours in writing.
Operational Staff	▪ Comply with the UFMP. ▪ Immediately notify line manager or relevant supervisor upon discovery of any unexpected contamination and/or potential ACM. ▪ Only undertake work that they have been trained in and are competent to complete. ▪ Follow all directions and instructions of site and local managers (such as Site Manager and Environmental Manager, etc.) ▪ Always wear appropriate PPE for the relevant task. ▪ Always undertake work/tasks with the appropriate SWMS. ▪ Engage in safe work practices, taking reasonable care for own health and safety and that of others. ▪ Participate in discussions and consultation on the management of WHS risks that may affect you. ▪ Do not wilfully place at risk the health, safety or wellbeing of others or misuse safety equipment.

7 UNEXPECTED FINDS CONDITIONS

An unexpected find is defined as any material that does not match the waste classification and/or analytical results in the Acceptance Letter provided by the waste transporter. This includes all ACM that is discovered during the carrying out of the operations of the facility but was not identified in the waste received onsite or was not suspected to be present. For unexpected contamination finds, conditions may include:

- Buried fibre cement products
- Buried bonded asbestos containing material (bonded ACM)
- Suspect materials within the building fabric not included within the asbestos register
- Unknown fibrous asbestos materials
- Asbestos Fines
- Unexpected discolouration of the soil, including staining and/or discolouration
- Unexpected odours from soil.

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PRESTONS WASTE TREATMENT FACILITY

UNEXPECTED FINDS MANAGEMENT PLAN

Integrated Management System

ENV-M-35

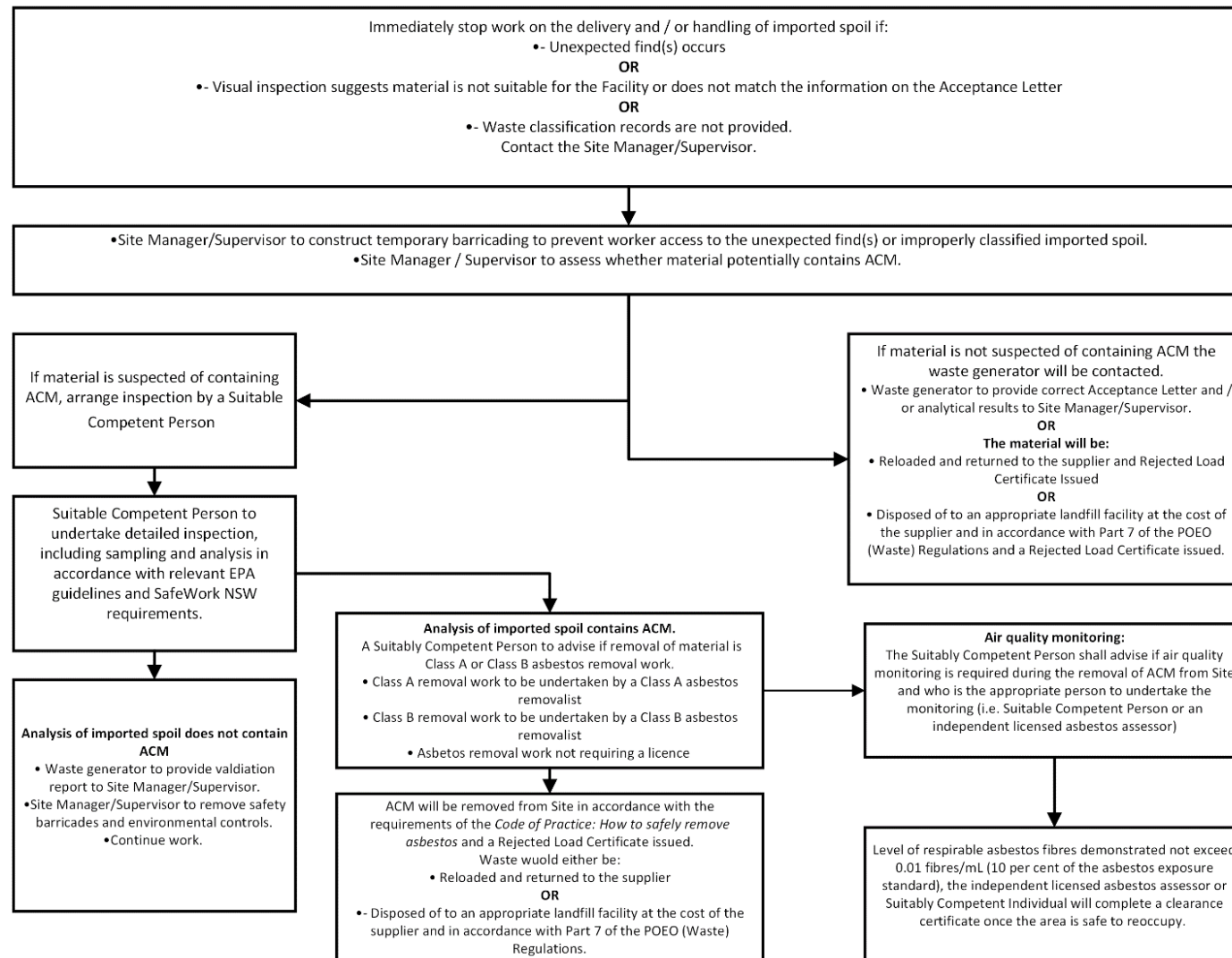


Figure 2. Unexpected Finds Protocols



PRESTONS WASTE TREATMENT FACILITY UNEXPECTED FINDS MANAGEMENT PLAN

Integrated Management System

ENV-M-35

8 ASBESTOS CONTAINING MATERIAL MANAGEMENT CONDITIONS

8.1 Immediate action

If material suspected of containing asbestos is found on site, the Site Manager / Supervisor must assume that the material contains asbestos and cease work immediately.

A Suitably Competent Person will be engaged to undertake sampling of the material to confirm or refute the assumption that the material contains asbestos.

If the presence of asbestos is confirmed the Site Manager / Supervisor will implement control measures, as recommended by the Suitably Competent Person, which may include:

- Determining the WHS Regulation requirements for removal of the ACM
- Setting the boundaries of the contamination as determined by an independent licensed asbestos assessor or competent person
- Ensuring there is minimal disturbance of the contaminated soil until the asbestos management procedures have been implemented
- Isolating and securing the removal work site using signs and barriers
- Controlling dust with dust suppression techniques (such as water and wetting agents)
- Providing PPE based on the level of contamination and the control measures implemented
- Sampling and/or air monitoring, at the advice of the Suitably Competent Person
- Implementing decontamination procedures for the workers and equipment.

8.2 Removal requirements

In accordance with the *Code of Practice: How to Safely Remove Asbestos*, removal of ACM requires a Class A licensed asbestos removalist for any friable asbestos to be removed, or a Class B licensed asbestos removalist if more than 10 m² of non-friable asbestos is to be removed.

8.2.1 Non-licensed removal work

A person who does not have a licence can remove 10 m² or less of non-friable asbestos. Where there is uncertainty as to whether the amount of non-friable asbestos is more or less than 10 m², a Class A or Class B licensed asbestos removalist should be engaged.

The Site Manager / Supervisor must ensure workers carrying out asbestos removal work are trained in the identification and safe handling of asbestos prior to carrying out asbestos removal work where a licence is not required. The Site Manager / Supervisor will be responsible for ensuring removal of the ACM is undertaken in accordance with the Code of Practice, including the following:

- identify hazards at the workplace
- ensure signs and barricades are erected to indicate and delineate the asbestos work area
- use the wet method to remove asbestos where reasonably practicable
- ensure the correct tools, equipment (and PPE are used
- ensure decontamination facilities are available
- contain and label asbestos waste and dispose of it as soon as reasonably practicable at a site licensed to accept asbestos waste
- ensure that PPE and clothing used in asbestos removal work and contaminated with asbestos is handled in accordance with the WHS Regulation.

8.2.2 Class B removal work

Asbestos removal work for more than 10 m² of non-friable asbestos requires the Site Manager / Supervisor to engage a Class B licensed asbestos removalist to conduct the removal work. The licensed asbestos removalist must give notice to SafeWork NSW immediately on 13 10 50 about the intention to remove the asbestos and in writing within 24 hours of the notification by telephone and provide the information required under Clause (CI) 466 of the WHS Regulations.

The Site Manager / Supervisor will inform workers on the Site that asbestos removal work is to be carried out at the Site and who the licensed contractor is who will be undertaking the work, in accordance with CI 468 of the WHS Regulations.

The licensed asbestos removalist must prepare an asbestos removal control plan for the licensed asbestos removal work. The asbestos removal control plan must include:

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- details of how the asbestos removal will be carried out, including the method to be used and the tools, equipment and PPE to be used, and
- details of the asbestos to be removed, including the location, type and condition of the asbestos.

The Class B licensed asbestos removalist must ensure that workers undertaking the asbestos removal work are competently trained to undertake those works.

The Site Manager / Supervisor must ensure the licensed asbestos removal supervisor with a Class B licence is readily available to a worker whenever they are carrying out the removal work. For example, the Class B licenced supervisor would be regarded as being accessible if they are contactable by phone and able to arrive at the workplace within 20 minutes.

8.2.3 Class A removal work

Class A asbestos removal work must be carried out by a Class A licensed, independent licensed asbestos assessor who is licensed to carry out the work. The licensed asbestos removalist must give notice to SafeWork NSW immediately on 13 10 50 about the intention to remove the asbestos and in writing within 24 hours of the notification by telephone and provide the information required under CI 466 of the WHS Regulations.

A person must hold a Class A asbestos assessor licence to:

- conduct air monitoring for Class A asbestos removal work
- conduct clearance inspections for Class A asbestos removal work, or
- issue clearance certificates in relation to Class A asbestos removal work.

The Class A licensed asbestos removalist must ensure that workers undertaking the asbestos removal work are competently trained to undertake those works and be on site throughout the removal works. The licensed asbestos removalist must prepare an asbestos removal control plan for the works.

The Site Manager / Supervisor will inform workers on the Site that asbestos removal work is to be carried out at the Site and who the licensed contractor is who will be undertaking the work, in accordance with CI 468 of the WHS Regulations.

For all asbestos removal requiring a Class A asbestos removal licence, an air-monitoring program must be implemented to ensure the control measures do not release airborne asbestos fibres.

When all visible asbestos has been removed, and the air-monitoring program indicates that the level of respirable asbestos fibres does not exceed 0.01 fibres/mL (10 per cent of the asbestos exposure standard), the independent licensed asbestos assessor must complete the clearance certificate.

8.3 Disposal of ACM

All asbestos and any contaminated soil removed will be disposed of as asbestos waste according to the WHS Regulation (i.e. it must be contained and labelled in accordance with the Globally Harmonized System of Classification and Labelling of Chemicals), the EPA, Part 7 of the POEO (Waste) Regulation and any requirements of the waste disposal facility licensed to accept asbestos.

9 GENERAL OPERATING PROCEDURES

9.1 Weighbridge Controls

The controls at the weighbridge include the following:

- Communication with the transporter of the waste load
- Management of rejected loads and the rejected load register
- Load details recording.

9.2 Acceptance Procedure and Risk Assessment

Weighbridge controls are in place to confirm waste loads arriving at the Prestons Facility to minimise the potential risks from a non-conforming load.

The weighbridge operator will conduct a visual inspection of the waste load. The acceptance procedure is to provide further risk assessment and controls to further minimise risk from non-conforming loads.

Where the inspection identifies that the waste is not permitted by the licence and/or asbestos is visually identified in the load may be rejected for acceptance and a Rejected Load Certificate issued.

9.3 Rejected Loads Register and Certificates

All rejected loads must be recorded within the Rejected Loads Register, which is a record of all rejected loads and must be maintained on the premises.

The Rejected Load Register is to contain the following information:

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- Date and time the load was rejected
- Transport company details
- Vehicle registration of vehicle delivering load
- Notes on actions taken
- Reason for load being rejected; and
- If a Rejected load Certificate was issued.

A Rejected Load Certificate is to be filled out when a load is rejected due to asbestos or other non-accepted contamination within the load.

The Rejected Load Certificate is to contain the following information:

- Certificate number
- Date and time the load was rejected
- Type of waste
- Origin of material
- Vehicle registration details
- Driver's name and licence details
- Transport company name and details; and
- Signatures of the driver and the Site Manager or Site Supervisor.

10 General Management

10.1 Environmental Management System (EMS)

The Prestons Facility operates under the Hi-Quality EMS that documents how the activities will be managed to minimize the impact, or the potential to impact, on the environment.

The Hi-Quality EMS includes:

- An Environmental Policy – a public policy endorsed by senior management that seeks compliance with relevant environmental legislation and continuous improvement
- Objectives and targets – established for aspects of the operations that may impact on the environment and which provide a focus for on-going improvement
- Procedures, work instructions and controls – provided to implement the Environmental Policy and to ensure the achievement of objectives and targets
- Audits – planned audits of the EMS should take place to ensure it is effectively meeting its goals. These audits should include audits of compliance with relevant operating procedures, processes, work instructions and controls; and
- Management reviews – to ensure the EMS remains suitable for the business and to set direction for future improvements.

10.1.1 Process Audit

As part of the EMS audit programme, process compliance audits must be conducted at least annually. These audits should be undertaken by a competent person who is not involved with the “day-to-day” operation of the site. The qualifications of the competent person must be detailed in the audit report.

Key areas which the audit should consider in relation to this UFMP include:

- The effectiveness and implementation of pre-acceptance, receipt, classification, unloading, inspection and sampling procedures
- The effectiveness and results of monitoring including product testing and interpretation of results
- The effectiveness of personnel training including the staff's ability to recognise unexpected contamination, and asbestos and notify the Site Manager / Supervisor
- Records and document retention; and
- The effectiveness of the UFMP and degree to which it reflects of site operations.

10.1.2 Record Keeping

Records are an important aspect of site operations and all records relating to unexpected contamination finds and asbestos on the Prestons Facility need to be retained and may include information relating to:

- Waste accepted and waste dispatched, rejected wastes
- Emissions or process monitoring results and interpretation.
- Any on or off-site environmental effects including pollution incidents and any associated management response
- Complaints received and management response
- Maintenance
- Non-conformances such as emission limit breaches and associated management response
- Training records; and

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- Audit findings and any improvement strategies.

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APPENDIX E TRAFFIC AND ACCESS MANAGEMENT PLAN

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STANBURY
TRAFFIC PLANNING

TRAFFIC, PARKING & TRANSPORT CONSULTANTS

OPERATIONAL TRAFFIC MANAGEMENT PLAN

**PROPOSED WASTE TREATMENT FACILITY
9-13 WHYALLA PLACE
PRESTONS**

**PREPARED FOR HI-QUALITY WASTE TREATMENT SERVICES PTY. LTD.
OUR REF: 22-122-19**



FEBRUARY 2023

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ATTACHMENTS

1. Heavy Vehicles that will Transport Waste to and from the Proposal Site
2. Heavy Vehicle Swept Path Assessment and Entry Queuing Plan
3. Hi-Quality Drivers Code of Conduct

1. INTRODUCTION

1.1 Scope of Assessment, Aims and Purpose of this Operational Traffic Management Plan

Stanbury Traffic Planning has been commissioned by Hi-Quality Waste Treatment Services Pty. Ltd. (Hi-Quality) to prepare an Operational Traffic Management Plan to accompany a State Significant Development at 9-13 Whyalla Place in Prestons (Proposal Site).

The aim of this Plan is to document the proposed car parking and heavy vehicle operations for the Proposal Site. The report contains the following sections:

- Section 1 provides a summary of the Proposal Site location, details, existing and surrounding land-uses;
- Section 2 describes the proposed loading and unloading operations and procedures; and
- Section 3 describes the proposed car parking procedures.

The purpose of this Operational Traffic Management Plan is to document the operation of vehicles to and from the proposed and within the waste treatment facility to enable orderly operation.

The orderly operation of heavy vehicles bringing materials to the Proposal Site and off-loading materials from the Proposal Site will benefit the Proposal Site operation and also reduce the risk of incidents on the adjoining road network.

1.2 Reference Documents

Reference has been made to the following documents in the preparation of this report:

- TfNSW's Guide to Traffic Generating Developments;
- Australian Standard for Parking Facilities Part 1: Off-Street Car Parking (AS2890.1:2004);
- Australian Standard for Parking Facilities Part 2: Off-Street Commercial Vehicle Facilities (AS2890.2:2018);
- Australian Standard for Parking Facilities Part 6: Off-Street Parking for People with Disabilities (AS2890.6:2009);
- 9-13 Whyalla Place, Prestons Waste Treatment Facility Transport Impact Assessment, prepared by PeopleTrans 16/04/2021 (PeopleTrans Report);

- Addendum Traffic & Parking Impact Assessment, Proposed Waste Treatment Facility, 9-13 Whyalla Place, Prestons, Stanbury Traffic Planning, December 2022 (Addendum Traffic Report);
- Environmental Impact Statement, Prestons Waste Treatment Facility prepared by Golder Associates, November 2021; and
- Architectural plans prepared by Golder for the proposed development, a selection of which are included in this report for reference.

2. OPERATIONAL REQUIREMENTS FOR HEAVY VEHICLES

2.1 Operational Details

Information regarding the operation of the Proposal Site is provided in the following sections of this report.

2.1.1 Hours of Operation

The facility will receive waste 24 hours per day, seven days per week, while processing and dispatch operations will be undertaken between 7:00am and 6:00pm on Monday to Saturday, and between 8:00am and 6:00pm on Sundays and Public Holidays.

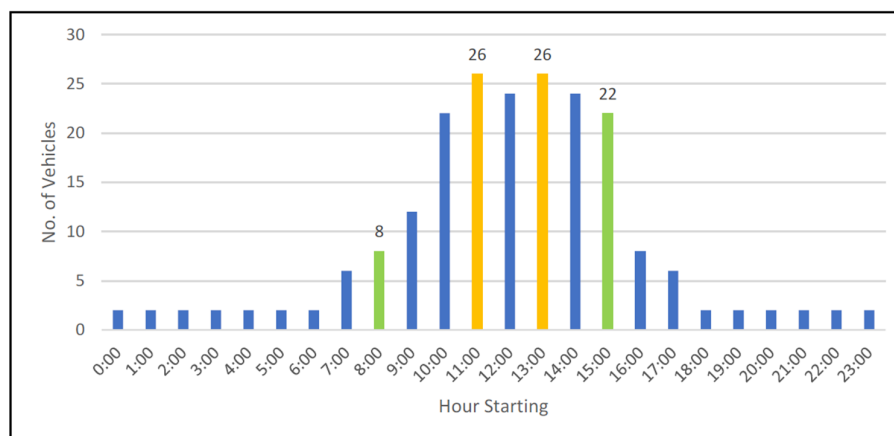
2.1.2 Largest Vehicle to Access the Proposal Site

The longest vehicle to access the Proposal Site will be a 'quin dog' which is approximately 22m long. The vehicle with the largest turning circle that will access the Proposal Site is a 19m semi-trailer. Details on the range of heavy vehicles that will transport waste to and from the Proposal Site are provided in **Attachment 1**. The swept path assessment has been undertaken based on the vehicle with the largest turning circle to access the Proposal Site.

2.1.3 Peak Operational Periods

The amount of material and numbers of trucks accessing the Proposal Site will vary across the week and across a typical busy weekday. The typical maximum truck demand as reported in the PeopleTrans Report Figure 7.4 is reproduced as **Figure 1**.

FIGURE 1
HOURLY HEAVY VEHICLE SITE TRAFFIC GENERATION (IN AND OUT COMIBNED)



Source: PeopleTrans Report Figure 7.4

Figure 1 indicates that the peak site heavy vehicle traffic generation is expected to be 26 vehicles (13 in and 13 out). This expected to occur between 11:00am and 12:00pm and between 1:00pm and 2:00pm on a typical busy weekday, denoted by the orange bars.

The green bars represent the Proposal Site traffic generation during the road network peak hours.

2.1.4 Speed Limit for the Proposal Site

To maximise safety, the speed limit within the Proposal Site is for vehicles to travel no faster than walking pace (5km/h).

2.2 Potential External Impacts

Potential impacts that may arise from haulage of products to and from the Proposal Site may include the following risks for the local road network:

- Increased safety risks;
- Noise and vibration;
- Dust;
- Product spillage; and
- Increased road maintenance requirements.

2.3 Location of the Heavy Vehicle Facilities On-Site

The proposed site plan is shown in **Figure 2**.

FIGURE 2
SITE PLAN

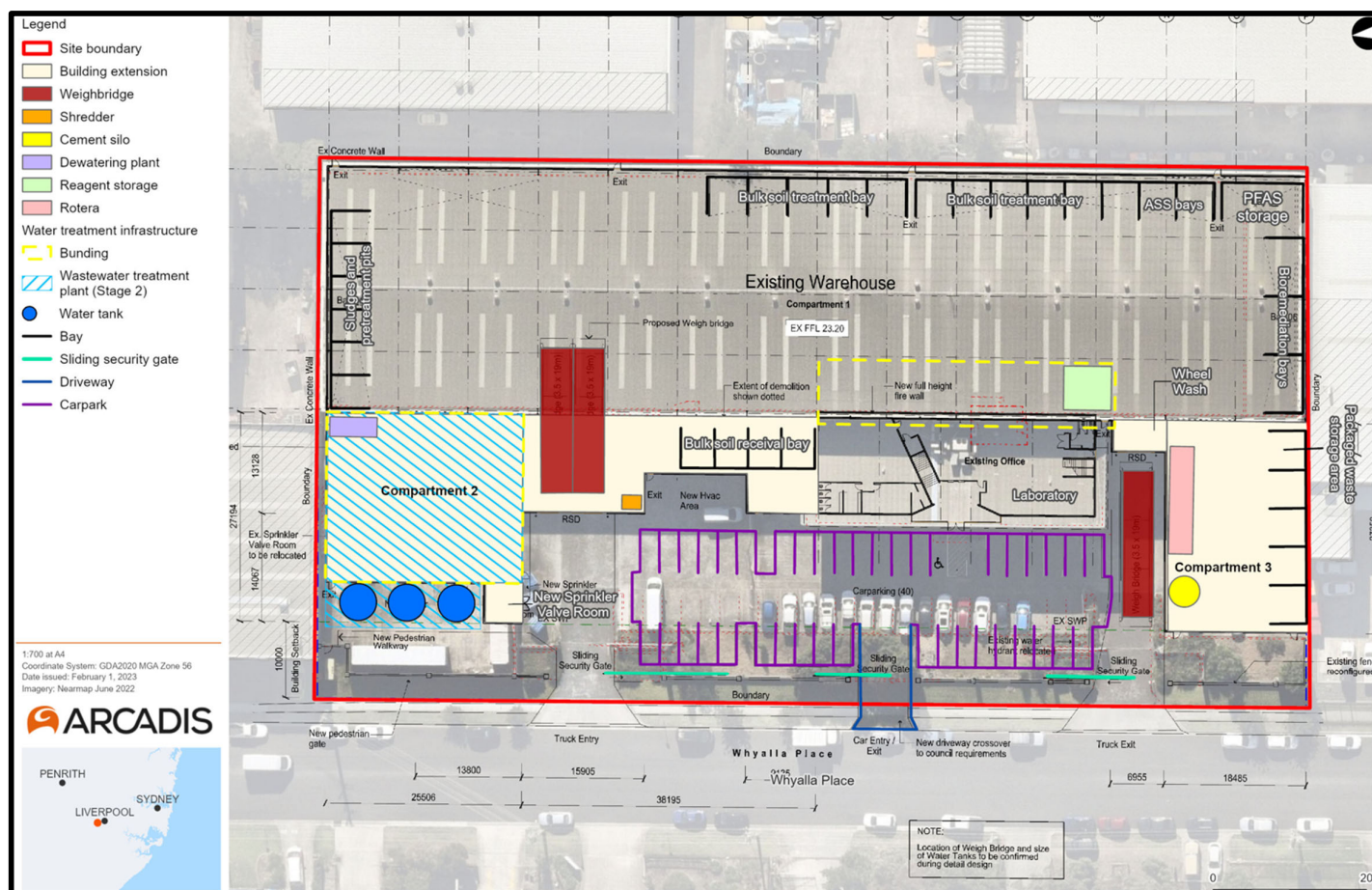


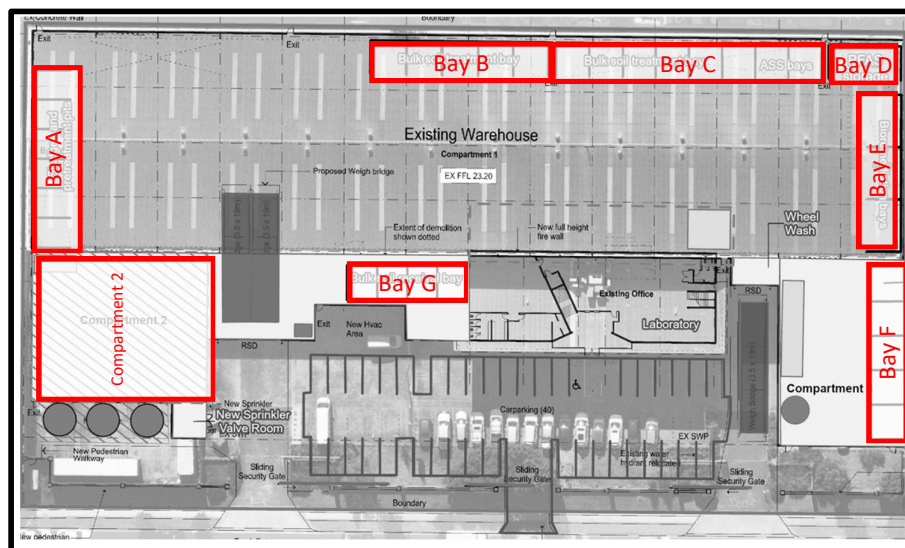
Figure 2 indicates that there are three site driveways proposed as follows:

- The northern driveway is to be used by heavy vehicles entering the Proposal Site;
- The central driveway is to be used by staff vehicles entering and exiting the Proposal Site car park; and
- The southern driveway is to be used by heavy vehicles exiting the Proposal Site.

The vehicle with the largest turning circle that is to enter the Proposal Site is a 19m long semi-trailer. The longest vehicle to access the Proposal Site will be a 'quin dog' which is approximately 22m long. There are adequate facilities to cater for the longest vehicle and the vehicle with the largest turning circle that will enter the Proposal Site.

The operation of the Proposal Site, each of the bays within the building has been provided with a number as shown in **Figure 3**.

FIGURE 3
SITE BAY NUMBERING



As documented in the PeopleTrans report, the peak site operation is expected to be between 10:00am and 4:00pm. During this time, the maximum number of vehicles expected to be processed was 6 inbound (unloading) vehicles and 7 outbound (loading) vehicles.

The operation of the identified areas is described in **Table 1**.

TABLE 1 INTERNAL SITE OPERATION	
Location	What happens here?
Bay A	Inbound unloading for Sediments and Sludge, Waste and Drill Mud
Bay B	Outbound material storage, including bulk soils
Bay C	
Bay D	
Bay E	
Bay F	Storage for 1 x Loader, 2 x forklifts, 1 x street sweeper, packaged wastes
Bay G	Inbound unloading for Bulk Solids Waste and Storage and Transfer Waste
Compartment 2	Inbound unloading for Liquid Waste

The heavy vehicle facilities include:

- 2 x entry weighbridges;
- 1 x exit weighbridge; and
- Numerous loading, unloading, storage and transfer bays for different material types.

A swept path assessment showing the internal operation, movement of trucks and waiting locations is provided as **Attachment 2**.

2.4 Heavy Vehicle Truck Scheduling

As a result of the multiple types of heavy vehicles that may visit the Proposal Site, accurate scheduling of all heavy vehicles is proposed to reduce the risk to all site users and to the adjoining road network.

All trucks travelling to and from the Proposal Site will be scheduled and recorded with the Transport Department in an allocation system. The allocation system will be managed by the Site Manager and should be easily accessible to all staff working at the Proposal Site and should be readily updatable to allow for delays or other issues experienced by delivery drivers or on-site.

For vehicles that deliver to the Proposal Site that are not owned by Hi-Quality, the allocation system will be made available for reserving a time for all deliveries to and from the Proposal Site. The method of reserving a time will be determined by the Site Manager and updated as required.

Details regarding each of these risk management measures are provided in the following sections.

2.5 Operational Procedures

2.5.1 To and From the Proposal Site

The proposed waste treatment facility will operate generally as follows:

- Delivery of untreated waste will occur to the Proposal Site each day via trucks with each truck capable of transporting various amounts of waste. The truck types that will deliver to the Proposal Site include 22m truck and dog configurations, 19m semi-trailers, shorter articulated vehicles and a range of rigid trucks up to and including 12.5m in length;
- All trucks travelling to the Proposal Site must be covered and covering should only be removed within the Proposal Site once the roller doors have fully closed;
- The Hi-Quality Transport Department allocates all Hi-Quality truck delivery times on a daily basis that will provide a high degree of certainty for the timing of each load delivered to the facility by Hi-Quality trucks;
- Hi-Quality tracks each of their trucks via GPS and as such knows their position at all times. Changes in scheduling can occur from the head office while the truck is travelling towards the Proposal Site to ensure drivers arrive at the correct time;
- For trucks that are not owned by Hi-Quality, all trucks that deliver to the Proposal Site are required to reserve a delivery time in an allocation system that links to the Hi-Quality owned trucks, allowing coordination between vehicles;
- Upon entry, each truck will enter via the northern driveway and stop on one of the weighbridges;
- If both weighbridges are occupied, trucks are to wait wholly inside the Proposal Site until one of the weighbridges is vacant; and
- Although the delivery allocation system managed by the Hi-Quality Transport Department system will be the primary method of scheduling vehicles to deliver to the Proposal Site, if any unforeseen delays occur to vehicles, as a 'last resort', if there is insufficient room for a truck to store wholly inside the Proposal Site, instructions are for trucks are to proceed 'around the block' via Whyalla Place, Dampier Place, Weld Street and Jedda Road, until such time as there is sufficient room to store wholly on the Proposal Site. Trucks are not to wait on Whyalla Place or any other roads in the vicinity of the Proposal Site.

2.5.2 Within the Proposal Site

Stanbury Traffic Planning has reviewed the internal site layout to determine the general operation for unloading, loading, queuing and manoeuvring zones for vehicles on the Proposal Site.

An excerpt of the layout is shown in **Figure 4** with the full plan provided in **Appendix 5** of this report.

FIGURE 4
POTENTIAL MAXIMUM NUMBER OF VEHICLES ON-SITE AT ANY ONE TIME

The internal site procedures for heavy vehicles are generally as follows:

- Following weighing, each truck will proceed forward and to the right (or south);
- A speed limit of walking pace (5km/h) will apply to all vehicles within the Proposal Site;
- Depending on their material, they will either then reverse into an unloading area, or be directed to by the Site Manager, to stop in a safe location inside the building to wait to unload;
- Once empty, trucks may either be directed to a loading area collect material to transport out of the Proposal Site, or leave the Proposal Site empty; and
- Upon exiting, all truck wheels will be washed and all loads covered to ensure no material leaves the Proposal Site (see **Figure 2** for the location of the truck wheel wash).

2.6 Site Manager Responsibilities

The Site Manager, supported by the Environmental Manager, carries ultimate responsibility for the implementation of this Operational Traffic Management Plan and providing the necessary resources as required. The Environmental Coordinator is responsible for carrying out and/or coordinating the monitoring and reporting requirements of this management plan.

Operational employees and/or contractors are responsible for responding to adverse site conditions and adjusting site operations to minimise environmental impacts. All site employees and/or contractors are responsible for reporting adverse site conditions to the Site Manager, who is responsible for review and formulation of appropriate action planning and response.

The Proposal Site is proposed to be actively managed by the Site Manager who will be responsible for the following tasks including but not limited to:

- Ensuring forward movement of heavy vehicles throughout the plant to reduce collision risk where possible (noting that some reverse movements are required for some waste types as shown in **Attachment 2**);
- Maintaining an incident management log to be kept on site and recording incidents;
- Implementation of the Hi-Quality Drivers Code of Conduct provided as **Attachment 3** of this report;

- Ensuring that local streets will not be used for parking or queuing of vehicles during ongoing operations unless in the event of road closure or performing local deliveries;
- Control or limit access to the waste treatment area and truck loading areas by pedestrians or vehicles to maintain safe operation the Proposal Site;
- Management of all heavy waste traffic that is operating on-site and at the interface of the Proposal Site and Whyalla Place;
- Ensuring that only authorised personnel are permitted in the loading areas or near manoeuvring trucks at any time;
- Ensuring trucks carrying waste or materials to or from the Proposal Site are covered;
- Ensuring any warning or other signage within the loading areas or on-site is clean and visible at all times;
- Ensuring that authorised personnel observe all relevant Occupational Health and Safety regulations and policies during operation at the loading areas;
- Ensure that clear access for egress from all emergency exit doors leading onto the loading areas are maintained;
- Actively monitor the schedule of all heavy waste vehicles arriving at the Proposal Site to ensure that no vehicles queue outside the Proposal Site onto Whyalla Place. This is discussed further in the **Section 2.7**; and
- Keep a complaints register in accordance with Hi-Quality's Operational Environmental Management Plan, which includes the recording of traffic management complaints and outcomes / actions.

2.7 Waste Traffic Management and Scheduling Requirements

To ensure the safe and effective operation of the loading areas on-site in accordance with this management plan, the Hi-Quality Transport Department will allocate all Hi-Quality truck delivery times on a daily basis that will provide a high degree of certainty for the timing of each load delivered to the facility by Hi-Quality trucks.

The Site Manager has the following main scheduling responsibilities:

- Maintain a delivery schedule, in consultation with the Hi-Quality Transport Department, for all waste heavy vehicles that deliver to or remove waste from the Proposal Site to minimise queuing and the traffic impact on the adjoining local road network;
- Inform delivery drivers scheduled of any delays on-site or changes to their delivery time;
- Manage all heavy vehicle traffic driving to the Proposal Site to ensure loading and servicing activities occur as scheduled and delays are minimised where possible;
- Ensure the traffic within the Proposal Site does not impact the adjoining road network and all large heavy vehicles enter and exit the Proposal Site in a forward direction; and
- Ensure that vehicles will be wholly contained onsite before being required to stop.

There is sufficient room for four vehicles to queue inside the Proposal Site within the weighbridge system.

Although the truck allocation system will be the primary method of scheduling vehicles to deliver to the Proposal Site, if any unforeseen delays occur to vehicles, as a 'last resort', if there is insufficient room for a truck to store wholly inside the Proposal Site, instructions are for trucks are to proceed 'around the block' via Whyalla Place, Dampier Place, Weld Street and Jedda Road, until such time as there is sufficient room to store wholly on the Proposal Site.

Trucks are not to wait on Whyalla Place or any other roads in the vicinity of the Proposal Site. A queuing plan showing the available queuing space for vehicles is provided in **Attachment 2** of this report.

The recommendations for vehicle scheduling are as follows:

- That during unloading peak times, inbound vehicles (trucks unloading) should be scheduled with a minimum 7-minute headway; and
- That during peak unloading times, outbound vehicles (trucks loading) should be scheduled with a minimum 15-minute headway.

The above recommendations should provide one independently operated spare truck parking space on-site to provide additional capacity in the system in case there are unforeseen delays.

2.8 Heavy Vehicle Delivery Routes to and from the Proposal Site

The approved 19.0m B-Double roads (over 50 tonnes) within the vicinity of the Proposal Site are shown in **Figure 6**.

FIGURE 6
APPROVED 19m B-DOUBLE ROUTES (OVER 50 TONNES) ROUTES IN THE VICINITY OF THE PROPOSAL SITE



Source: <https://roads-waterways.transport.nsw.gov.au/business-industry/heavy-vehicles/maps/restricted-access-vehicles-map/map/index.html> - Accessed 16/12/22

Figure 6 indicates that Whyalla Place, Joadja Road, Jedda Road, Ash Road, and Lyn Parade are all 19m B-Double approved routes (over 50 tonnes) that provide access to the Proposal Site.

There are no additional restrictions recommended outside the current road restrictions for vehicles travelling to or from the Proposal Site.

The roads in the vicinity of the Proposal Site were described in Table 2.1 of the PeopleTrans report which has been reproduced as **Table 2**.

TABLE 2
SUMMARY OF KEY ROADS IN THE VICINITY OF THE PROPOSAL SITE

Road Name	Classification	Orientation	Configuration	On-Street Restrictions
M7 Motorway	State Road	North-south	2 lanes in each direction	No stopping
Bemera Road	State Road (at M7 interchange) Unclassified Regional Road (south of M7 interchange)	North-south	2 lanes in each direction at M7 interchange 1 lane in each direction between M7 interchange and Kurrajong Road	No stopping
Jedda Road	State Road (between Bemera Road and Joadja Road) Local Road (east of Joadja Road)	East-west	2 lanes in each direction (State Road) 1 lane in each direction with provision of kerbside parking on both sides (Local Road)	Unrestricted parking
Joadja Road	State Road	North-south	2 lanes in each direction	No stopping
Hoxton Park Road	State Road	East-west	2 lanes in each direction for general traffic In addition, 1 lane in each direction for Transitway buses (Liverpool-Parramatta Transitway)	No stopping
Kurrajong Road	Unclassified Regional Road (east of Bemera Road)	East-west	1 lane in each direction east of Bemera Road	No stopping
Beech Road	Unclassified Regional Road (north of M5 Motorway)	North-south	1 lane in each direction north of M5 Motorway	No stopping
Lyn Parade	Local Road	North-south	1 lane in each direction with provision of kerbside parking on both sides	Unrestricted parking north of Enterprise Circuit. No stopping on the western side of Lyn Parade south of Enterprise Circuit. Parking 7pm to 6am Monday to Friday, and all day Saturday to Sunday and Public Holidays, with long or heavy vehicles permitted to stop longer than 1 hour on the eastern side of Lyn Parade south of Enterprise Circuit.
Ash Road	Local Road	North-south	1 lane in each direction with provision of kerbside parking on both sides	Parking 7pm to 6am Monday to Sunday with long or heavy vehicles permitted to stop longer than 1 hour.
Whyalla Place	Local Road	North-south	1 lane in each direction with provision of kerbside parking on both sides	Parking 7pm to 6am Monday to Sunday with long or heavy vehicles permitted to stop longer than 1 hour. Unrestricted parking on the eastern side of Whyalla Place south of the site.

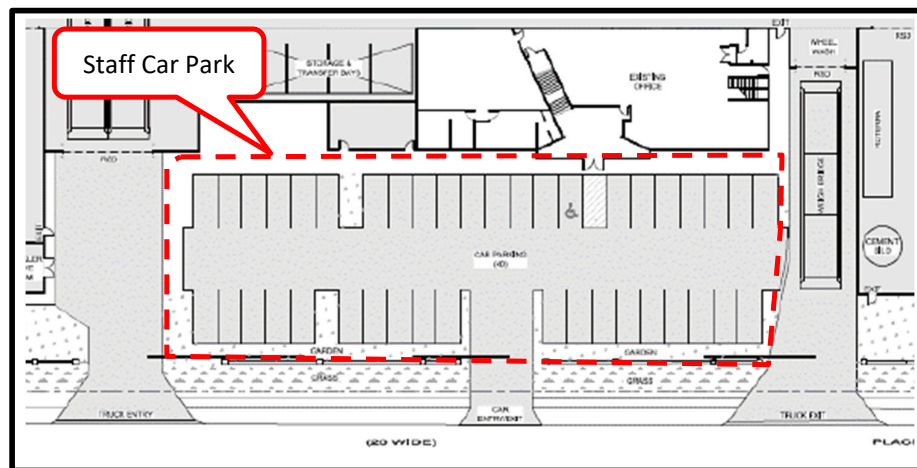
Source: PeopleTrans Report Table 2.1

3. OPERATIONAL REQUIREMENTS FOR STAFF AND LIGHT DELIVERY VEHICLES

3.1 Location of the Staff and Light Delivery Vehicle Car Parking Facilities On-Site

The proposed site plan, illustrating car parking spaces, is shown in **Figure 7**.

FIGURE 7
LOCATION OF THE STAFF CAR PARK



Source: PeopleTrans Report Figure 3.1

Figure 7 indicates that there are 40 car parking spaces for staff and light delivery vehicle use, including one disabled car parking space.

3.2 Operational Procedures / Car Parking Management Strategy

The following operational procedures in relation to staff and light delivery vehicles should be followed:

- All car parking spaces are to be shared between all staff members with no spaces allocated to specific staff members;
- Staff members who drive to the Proposal Site and are part of a site carpooling initiative are to be given priority to occupy designated on-site staff parking spaces;
- This Car Parking Management Strategy should be implemented at occupation of the development and should be maintained and developed throughout the lifecycle of the development to adjust to the parking and transport needs of the staff; and
- Hi-Quality should ensure that all new staff members are made aware of nearby public transport and active transport facilities in the vicinity of the proposed development.

3.3 Couriers and Small Delivery Vehicles

All courier and small delivery vehicles should be directed to park in the staff car park. This will be aided by the following procedures:

- Appropriate signage at the central site driveway advising where couriers should park;
- Where possible, when ordering goods to be delivered, include clear instructions for where couriers are to park; and
- Where possible, deliveries will be scheduled outside of the shift change over period at 3:00pm on weekdays.

4. CONCLUSION

This Operational Traffic Management Plan provides a description of the management measures to be incorporated during the operation of the heavy vehicle loading areas and the light vehicle car parking areas servicing the proposed Waste Treatment Facility at 9-13 Whyalla Place in Prestons.

I certify that the management measures to be implemented by this Operational Traffic Management are appropriate to satisfy the operational requirements of the Proposal.



Morgan Stanbury
Road Safety Auditor
Accreditation: Level 3
Auditor ID: RSA 02-0252

3 February 2023

ATTACHMENT 1

INCOMING

Total Incoming Waste 270000

Type	Number	Unit	Notes
Bulk Solids Waste	110,000 t pa		
	28 t truck		Assume 28 t truck (lowest capacity)
	3,929 trucks pa		
Sediments and Sludge Waste	20,000 t pa		
	10 kL tanker		Assume 10 kL tanker (lowest capacity)
	1,429 trucks pa		Assume sludge density 1400 kg/m ³ = 1.4 t/m ³ = 1.4 t/kL
Liquid Waste	70 ML pa		
	10 kL tanker		Assume 10 kL tanker (lowest capacity)
	7,000 trucks pa		
Drill Mud	10,000 t pa		
	35 kL tanker		Assume 35 kL vac truck
	286 trucks pa		
Storage and Transfer Waste	60,000 t pa		
	20 t Pantech		
	3,000 trucks pa		

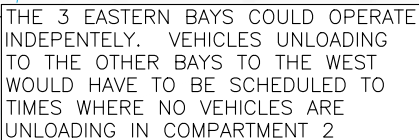
OUTGOING

Total Outgoing Waste 270000

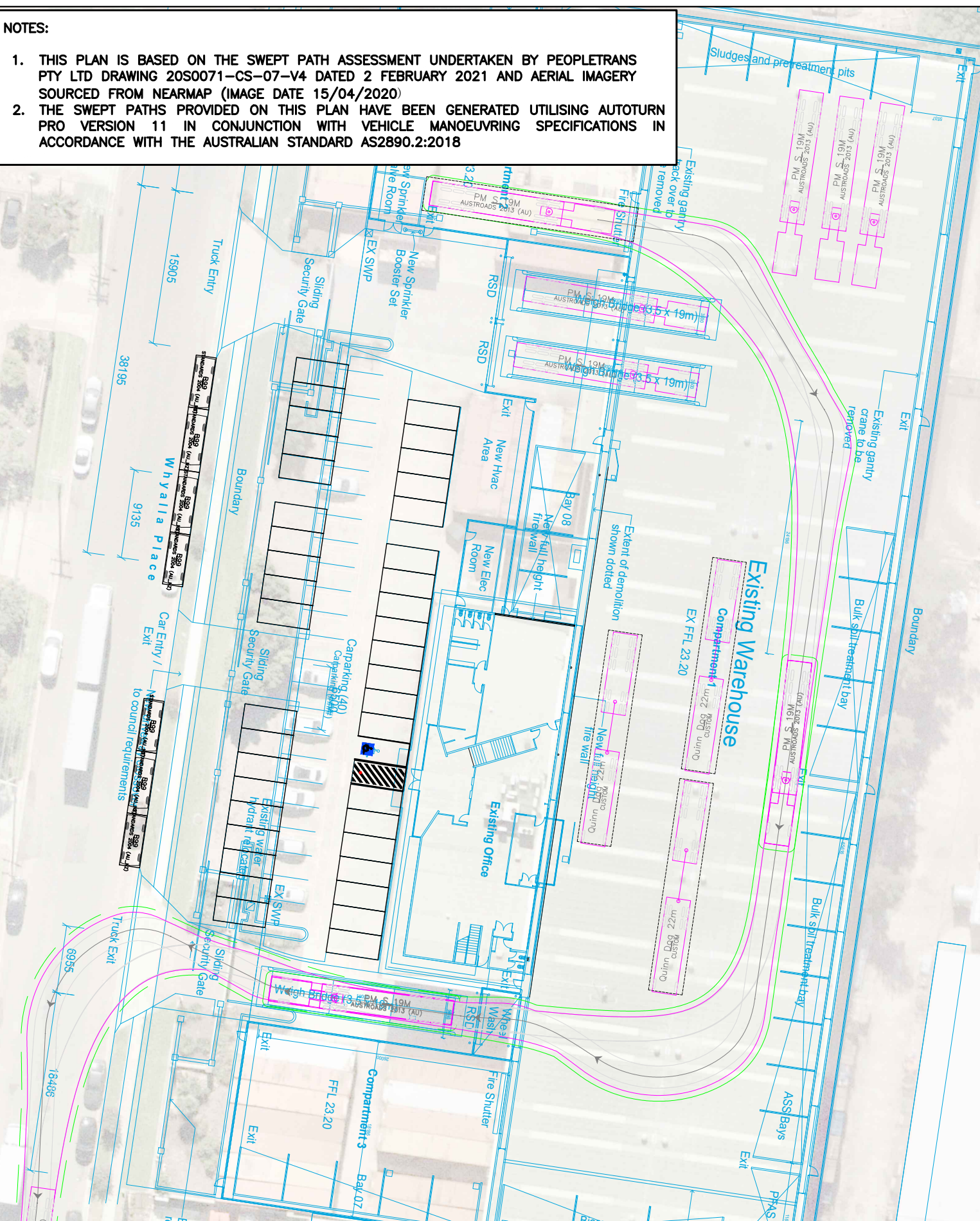
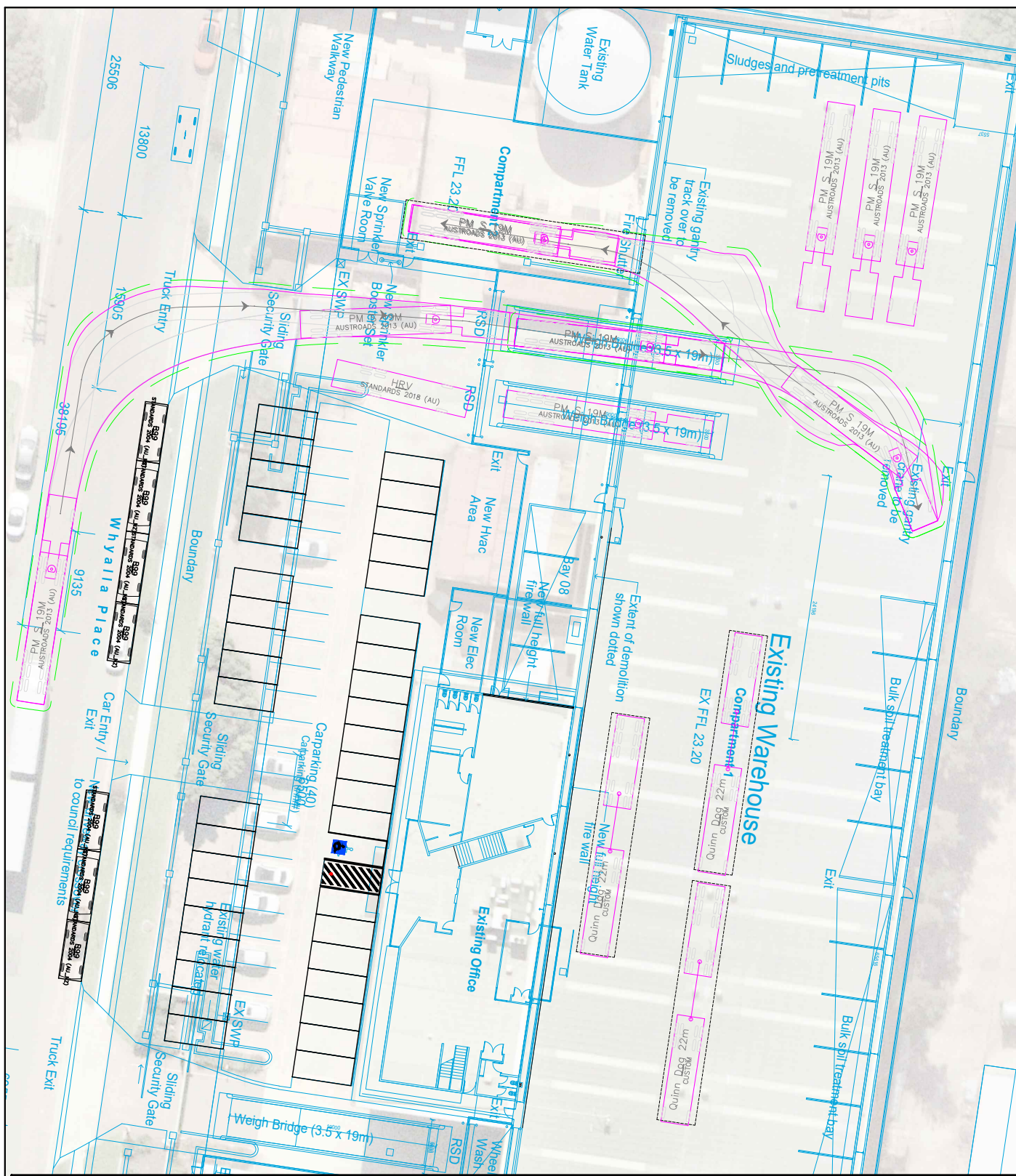
Process - destination	Number	Unit	Notes
Physical screening - to licensed facility	20,000 t pa		
	28 t truck		Assume 28 t truck (lowest capacity)
	715 trucks pa		
Bioremediation - to landfill or re-use	10,000 t pa		
	28 t truck		Assume 28 t truck (lowest capacity)
	358 trucks pa		
Chemical Oxidation - to landfill or re-use	10,000 t pa		
	28 t truck		Assume 28 t truck (lowest capacity)
	358 trucks pa		
Immobilisation - to landfill	60,000 t pa		
	28 t truck		Assume 28 t truck (lowest capacity)
	2,143 trucks pa		
Acid Sulphate Soil - to landfill	30,000 t pa		
	28 t truck		Assume 28 t truck (lowest capacity)
	1,072 trucks pa		
Liquid Waste Treatment Plant - filter cake to licensed facility	4,000 t pa		
	28 t truck		Assume 28 t truck (lowest capacity)
	143 trucks pa		
Liquid Waste Treatment Plant - to sewer	65 ML pa		
	10 kL tanker		Assume 10 kL tanker (lowest capacity)
	6,500 trucks pa		
Liquid Waste Treatment Plant - waste oil to contractor	1,000 t pa		
	28 t truck		Assume 28 t truck (lowest capacity)
	36 trucks pa		
Drill Mud Processing Plant - to sewer	4,000 t pa		
	35 kL tanker		Assume 35 kL vac truck
	115 trucks pa		
Drill Mud Processing Plant - to landfill or re-use	6,000 t pa		
	38 t truck		Assume 28 t tipper (85 cum)
	158 trucks pa		
Storage and Transfer Waste - to licensed facility	60,000 t pa		
	28 t truck		Assume 28 t truck (lowest capacity)
	2,143 trucks pa		

ATTACHMENT 2

1. THIS PLAN IS BASED ON THE SWEEP PATH ASSESSMENT UNDERTAKEN BY PEOPLETRANS PTY LTD DRAWING 20S0071-CS-07-V4 DATED 2 FEBRUARY 2021 AND AERIAL IMAGERY SOURCED FROM NEARMAP (IMAGE DATE 15/04/2020)
2. THE SWEEP PATHS PROVIDED ON THIS PLAN HAVE BEEN GENERATED UTILISING AUTOTURN PRO VERSION 11 IN CONJUNCTION WITH VEHICLE MANOEUVRING SPECIFICATIONS IN ACCORDANCE WITH THE AUSTRALIAN STANDARD AS2890.2:2018



- NOTES:
- 1. THIS PLAN IS BASED ON THE SWEEP PATH ASSESSMENT UNDERTAKEN BY PEOPLETRANS PTY LTD DRAWING 20S0071-CS-07-V4 DATED 2 FEBRUARY 2021 AND AERIAL IMAGERY SOURCED FROM NEARMAP (IMAGE DATE 15/04/2020)
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SWEPT PATH KEY:			
	VEHICLE CENTRE LINE		
	VEHICLE TYRE PATH		
	VEHICLE BODY PATH		
	600mm CLEARANCE FROM VEHICLE BODY		

PM S 19M	Quinn Dog 22m	HRV
Tractor Width : 2.50	First Unit Width : 2.50	Width : 2.50
Trailer Width : 2.50	Trailer Width : 2.50	Trailer Width : 2.50
Tractor Track : 2.50	First Unit Track : 2.50	Tractor Track : 2.50
Trailer Track : 2.50	Trailer Track : 2.50	Trailer Track : 2.50
Lock to Lock Time : 6.0	Lock to Lock Time : 6.0	Lock to Lock Time : 6.0
Steering Angle : 27.8	Steering Angle : 38.6	Steering Angle : 36.7
Articulating Angle : 70.0	Articulating Angle : 70.0	Articulating Angle : 70.0

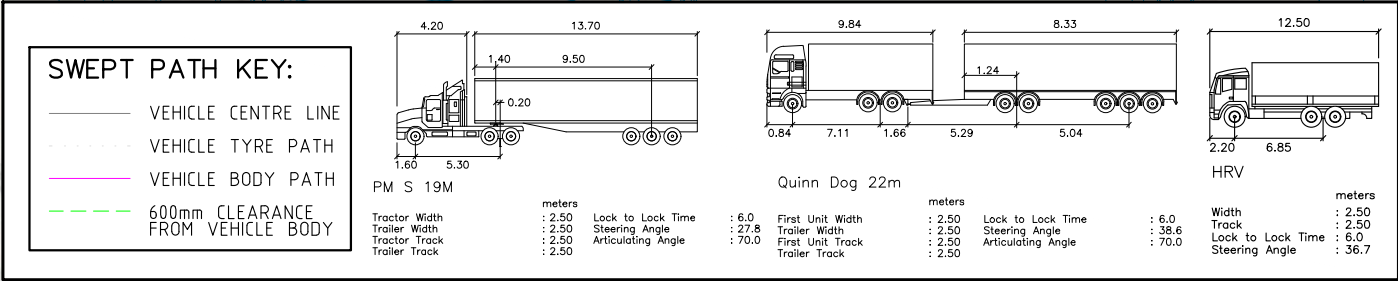
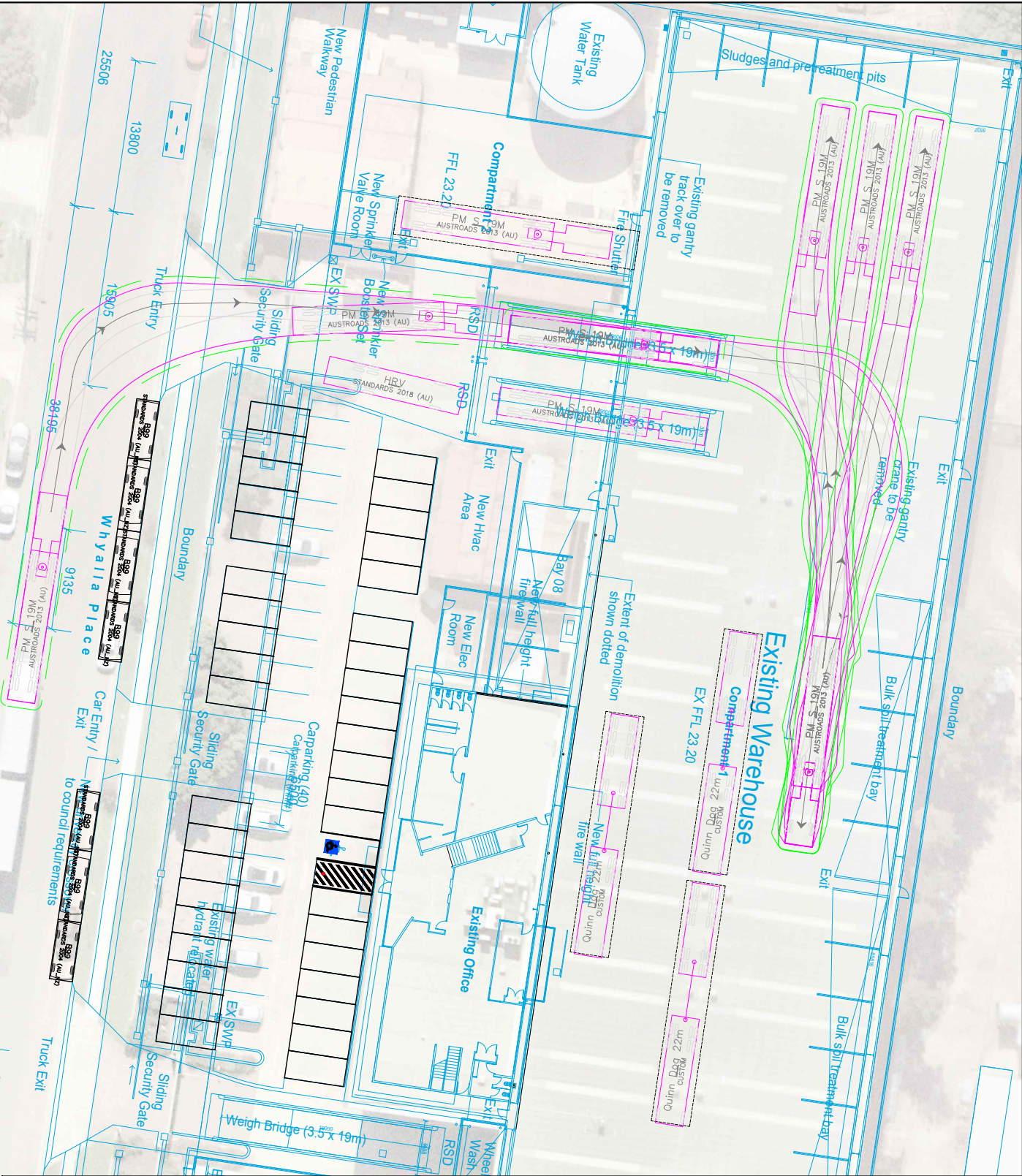


ADDRESS: 401/380 HARRIS ST, PYRMONT
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WEBSITE: www.stanburytraffic.com.au

STANBURY TRAFFIC PLANNING
9-13 WHYALLA PLACE, PRESTONS
CAR PARK COMPLIANCE REVIEW
PROPOSED WAREHOUSE FACILITIES
SWEEP PATH ASSESSMENT

SCALE	0 5.0 10.0 1:500@A3	CREATED BY Y.H
DRAWING NO.	22-122-01-V4	APPROVED BY M.S
DATE	2 February 2023	SHEET 02 / 07

- NOTES:
1. THIS PLAN IS BASED ON THE SWEEP PATH ASSESSMENT UNDERTAKEN BY PEOPLETRANS PTY LTD DRAWING 20S0071-CS-07-V4 DATED 2 FEBRUARY 2021 AND AERIAL IMAGERY SOURCED FROM NEARMAP (IMAGE DATE 15/04/2020)
 2. THE SWEEP PATHS PROVIDED ON THIS PLAN HAVE BEEN GENERATED UTILISING AUTOTURN PRO VERSION 11 IN CONJUNCTION WITH VEHICLE MANOEUVRING SPECIFICATIONS IN ACCORDANCE WITH THE AUSTRALIAN STANDARD AS2890.2:2018





STANBURY
TRAFFIC
PLANNING
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STANBURY TRAFFIC PLANNING

9-13 WHYALLA PLACE, PRESTONS

CAR PARK COMPLIANCE REVIEW

PROPOSED WAREHOUSE FACILITIES

SWEPT PATH ASSESSMENT

SCALE 0 5.0 10.0 1:500@A3

DRAWING NO. 22-122-01-V4

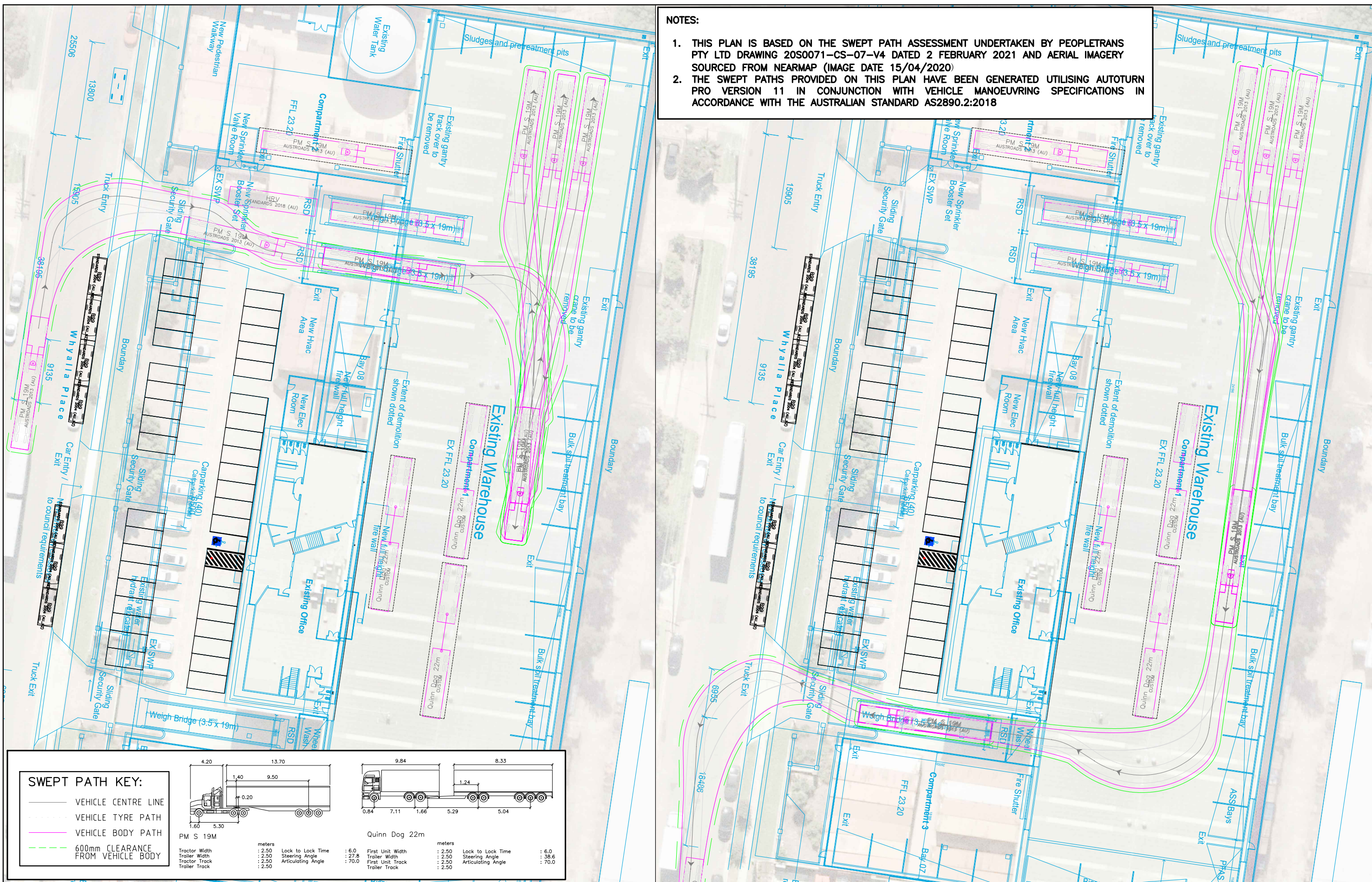
DATE 2 February 2023

CREATED BY Y.H

APPROVED BY M.S

SHEET 03 / 07

- NOTES:
- 1. THIS PLAN IS BASED ON THE SWEEP PATH ASSESSMENT UNDERTAKEN BY PEOPLETRANS PTY LTD DRAWING 20S0071-CS-07-V4 DATED 2 FEBRUARY 2021 AND AERIAL IMAGERY SOURCED FROM NEARMAP (IMAGE DATE 15/04/2020)
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SWEPT PATH KEY:

- VEHICLE CENTRE LINE
- VEHICLE TYRE PATH
- VEHICLE BODY PATH
- 600mm CLEARANCE FROM VEHICLE BODY

PM S 19M

Quinn Dog 22m

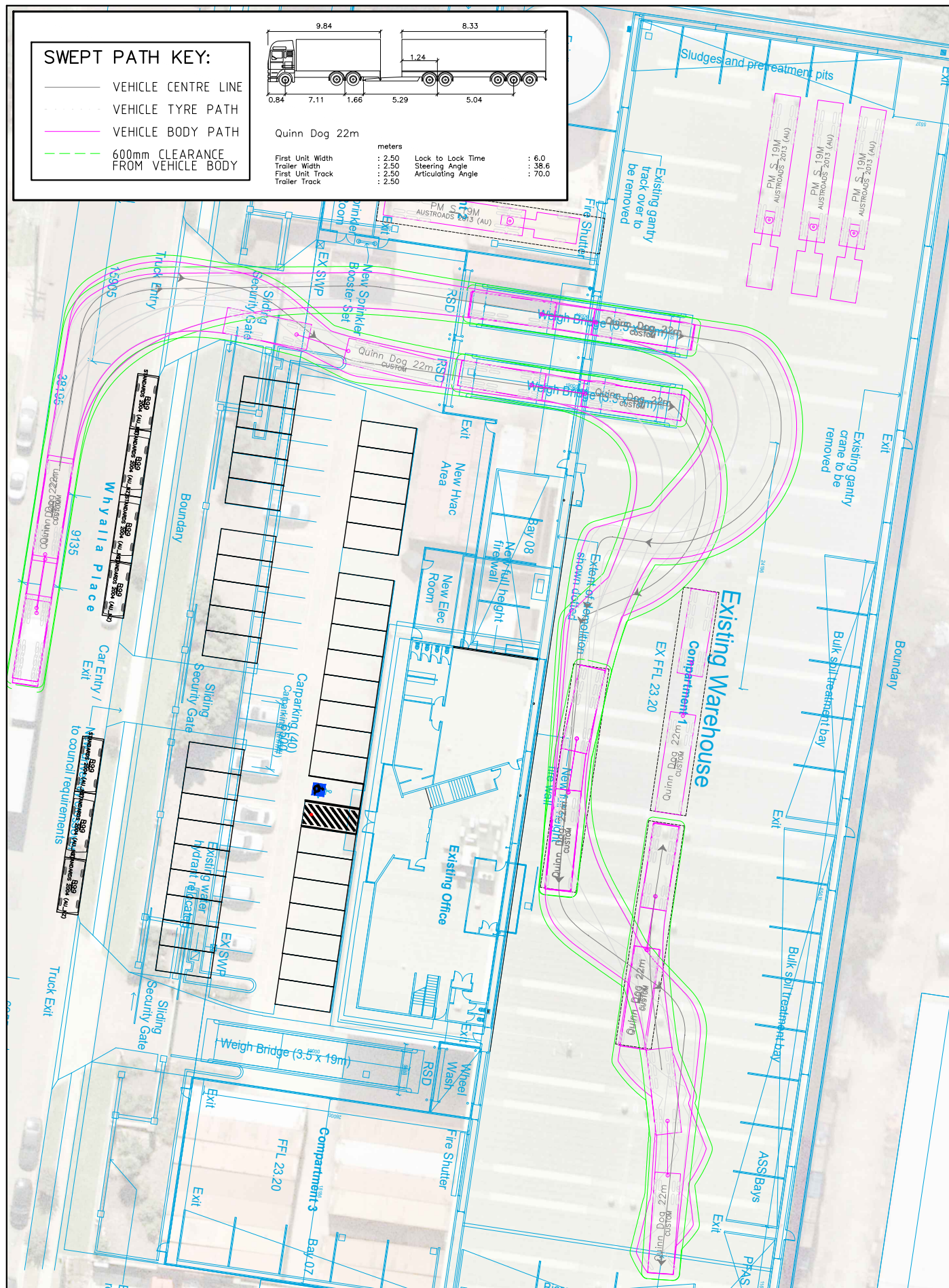
Tractor Width	1.60	Lock to Lock Time	6.0	First Unit Width	2.50	Lock to Lock Time	6.0
Trailer Width	5.30	Steering Angle	27.8	Trailer Width	2.50	Steering Angle	38.6
Tractor Track	2.50	Articulating Angle	70.0	First Unit Track	2.50	Articulating Angle	70.0
Trailer Track	2.50			Trailer Track	2.50		



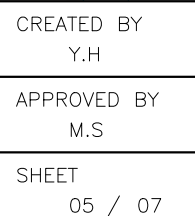
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STANBURY TRAFFIC PLANNING
9-13 WHYALLA PLACE, PRESTONS
CAR PARK COMPLIANCE REVIEW
PROPOSED WAREHOUSE FACILITIES
SWEEP PATH ASSESSMENT

SCALE	0 5.0 10.0	1:500@A3	CREATED BY Y.H
DRAWING NO.	22-122-01-V4	APPROVED BY M.S	
DATE	2 February 2023	SHEET 04 / 07	



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ATTACHMENT 3



HI-QUALITY GROUP

EMPLOYEE HANDBOOK

WELCOME

IMPORTANT INFORMATION FOR EMPLOYEES

23. **Truck Driver Conduct and Responsibilities**

Please read the below requirements in conjunction to the conditions outlined in the “Driver Conduct & Responsibilities Standard”.

23.1 **General**

It is expected that our drivers conduct themselves in a professional manner that reflects the expectations of Hi-Quality Group as a company. These expectations extend to the drivers’ behaviour on the road as well as their dealings with customers and third parties as representatives of the company.

The Company requires our heavy vehicle drivers to use the NHVR National Driver Work Diary every day, even when working within 100km from base

We also require our heavy vehicle drivers to hold, or willing to obtain, Basic Fatigue Management (BFM) accreditation. The company will run courses from time to time to cover drivers who don't have this accreditation.

If in the course of your duties you are required to be away from home base and stay overnight in the truck sleeper cab, the Company will compensate you with the applicable allowance. If a sleeper cab is not available, the Company will organise suitable accommodation and an applicable meal allowance will be compensated.

23.2 **Dress and Presentation**

Drivers are required to be professionally presentable at all times and if a uniform is issued, it must be worn. Under no circumstances are other company's uniforms to be worn while a driver is representing the Hi-Quality Group.

High visibility vest/shirts and steel capped boots are to be worn at all times whilst working on company premises or around your vehicle or whilst performing any duties related to your employment. Thongs and singlets are strictly prohibited at all times.

Site dress rules are as per each individual site-specific induction.

23.3 **Driver Conduct**

Company heavy vehicles are fitted with multi camera monitoring and GPS tracking for the purposes of security, incident investigations, and monitoring driver behaviour. Cameras and GPS will be continuous and ongoing. Management reserves the right to review and use the dashcam monitoring and GPS tracking data in any internal investigations, including disciplinary proceedings. Evidence

provided by the footage and GPS tracking data may be used to undertake adverse action against an employee.

Drivers found to be in control of a vehicle under the influence of alcohol or drugs, driving whilst disqualified, driving in a manner considered dangerous or conducting themselves in an unsatisfactory manner to the public, will be dealt with at the discretion of management.

Drivers of company vehicles shall be alert and fit when driving. Drivers must avoid driving when tired, sleepy or lacking ability to operate the vehicle correctly.

Drivers shall have a thorough knowledge of the road rules and it is expected that drivers shall adhere to them at all times.

Drivers are to ensure that the hours that they work fall within the required regulations at all times. The allocator is to ensure that drivers are not placed in a situation where they are unable to return to their depot within the legally permissible work hours.

The Transport Manager/Supervisor/Allocator must ensure that the reports from the tracking system are reviewed and any reports that may identify any breach are investigated and dealt with appropriately.

All defects on heavy vehicles noticed by the driver should immediately be reported to the Transport Manager /Allocator through allocations and should be reported in the Fleet Maintenance Program E.g. Gearbox .

Drivers should remember at all times when operating heavy vehicles that right of way is always something that may be given but should never be taken.

23.4 **Safe Driving**

Drivers should be aware that the safe speed in any situation is relative but not limited to the following conditions:

- Driver's capabilities and surrounding condition.
- Condition of vehicle being driven.
- The prevailing road condition.
- Keep within the speed limit.

Hi-Quality Group expects that all Drivers:

- Carry out a visual inspection to ensure the vehicle is loaded correctly prior to leaving job/site.

- Use good road manners, and show courtesy to other road users.
- Do not overtake unless necessary and until absolutely sure that the road is clear ahead and around the vehicle.
- Do not travel too close to the vehicle in front at any time. Always remember that a heavy vehicle requires more time to stop.
- Respect the rights of others and ensure that the right attitude is applied towards driving.
- Always concentrate on safe driving practices.
- Hi Quality trucks must travel legally apart. They must be separated by at least one other vehicle in between or on country roads where there is no other traffic a reasonable stopping distance must be kept between the trucks. Failure to comply with this may result in dismissal.

23.5 Defensive Driving

Drivers should be aware that wet roads are hazardous and extra care is required.

Drivers should increase the distance behind the vehicle in front when travelling on wet roads.

23.6 Operating Vehicles on Private Property

Drivers shall conduct themselves in a professional and courteous manner while operating Company vehicles on Customer/Private property. They must remember that the company's reputation is on display at all times.

All rules, requirements and regulations that apply to any site must be observed at all times including posted speed limits.

Drivers must always:

- Adhere to the conditions on sites particularly on wet days.
- Be aware of pedestrian activity or any plant and equipment operating around the drivers work area.
- Obey all lawful directions given to them while they are on site.

When approaching a job site for the first time, the driver is encouraged to park safely outside the job and if possible communicate via the appropriate 2-way radio

channel. If required walk in to make contact with someone on the site to receive delivery instructions. The driver should also take this opportunity to familiarise themselves with the site and identify any risks or hazards.

23.7 Reversing

All reversing in the transport yard or on site is to be kept to a minimum. It is safer to go to a desired position in a forward direction rather than reverse for any great distance.

Other than when tipping, drivers are asked to use hazard lights while reversing.

At all times when reversing a truck, loaded van or any other vehicle where, due to load or conditions, clear line of site from all internal and external rear view mirrors is impeded or obscured in any way, you must use a spotter to assist. Any damage done when not using a spotter will be considered negligent.

23.8 Vehicle Cleanliness

Drivers shall be responsible for the inside and outside appearance of the vehicle. The wash bay has been equipped with a high-pressure cleaner, truck wash and brooms and this equipment should be utilized when required or when instructed.

The Transport Manager must ensure that all drivers are trained and properly familiarized with the correct and safe operating procedure for the high-pressure cleaner and truck cleaning equipment.

Cab interiors are to be swept out daily and all personal rubbish removed.

Window cleaner, dashboard shine and rags are supplied and should be utilized by all drivers when required.

Acknowledgement of receipt of a Hi-Quality Group Employee Handbook

I acknowledge that I have received a copy of Hi-Quality Group Employee Handbook. I agree to comply with all rules and conditions set out in this Handbook and any reasonable instruction given by management or their representatives.

Full name: _____

Signed: _____ Dated: _____

Manager

Full name: _____

Signed: _____ Dated: _____

This receipt is to be completed at the time of issue and retained in your employment file.