



# **Environmental Management Strategy**

Enviroking

January 2023

Enviroking Pty Ltd  
843 John Renshaw Drive  
Black Hill  
NSW

Version 8

For internal Enviroking use and distribution only.

# Environmental Management Strategy

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## DOCUMENT CONTROL

Reference	Status	Date	Prepared	Checked	Authorised	Changes Made
	Version 1	July 2012	SESL			
	Version 2	October 2013	SLR Chris Jones			
	Version 3	October 2016	Enviroking	T Warneken	R Lodge	
	Version 4	November 2017	Enviroking	T Warneken	R Lodge	
	Version 5	November 2018	Enviroking	T Warneken	R Lodge	
	Version 6	October 2019	Enviroking	E Brigden	R Lodge	
	Version 7	August 2022	Enviroking	R Lodge	R Lodge	
	Version 8	January 2023	Enviroking	K Harper	R Lodge	No Changes Made

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1	INTRODUCTION	4
2	SCOPE AND OBJECTIVES	4
3	PERFORMANCE CRITERIA	5
4	STATUTORY OBLIGATIONS	5
	4.1 Approvals, Licenses, Permits and Leases	5
	4.2 Relevant Legislation	6
	4.3 Relevant Guidelines and Exemptions	6
5	ROLES AND RESPONSIBILITIES	6
6	POTENTIAL ENVIRONMENTAL IMPACTS	8
	6.1 Environmental Aspect Analysis	8
	6.2 Risk Ratings	8
7	ENVIRONMENTAL MANAGEMENT ELEMENTS	12
	7.1 Environmental Policy	12
	7.2 Environmental Management Plans	12
	7.3 Environmental Training and Awareness	13
	7.4 Document Control	13
	7.5 Audits and Inspections	13
8	WASTE MANAGEMENT	14
	8.1 Monitoring Program	15
	8.2 Waste Tracking System	16
9	COMMUNITY ISSUES	17
	9.1 Community Involvement and Information Dissemination	17
	9.2 Complaint Protocol	17
	9.3 Dispute Resolution	18
	9.4 Non-Compliance/Incident Response	19
	9.5 Emergency Response	20
	9.5.1 Procedures and Responses	20
10	MONITORING AND REVIEW	23

10.1	Monitoring	23
10.2	EMS Review	23

## **APPENDICES**

Appendix 1 – Project Approval (PA07\_0048)

Appendix 2 – EPL 11180

Appendix 3 – Environmental Policy

Appendix 4 – Environment and Community Broadbrush Risk Assessment

Appendix 5 – Environment and Community Targets

Appendix 6 – Environmental Incident Report

Appendix 7 – Monthly Environmental Inspection

Appendix 8 – Management Plans

Appendix 9 – Sampling Procedure

## 1 INTRODUCTION

Enviroking Liquid Waste Facility, operated by Enviroking Pty Ltd, is located at 843 John Renshaw Drive, Blackhill (Lot 931 DP 816814), within the Cessnock City Council (*here after Council*) local government area. The facility receives and treats liquid waste and reuses treated waste by exempted land application and irrigation, or disposal into landfill, sewage treatment plants or other licensed facilities.

The facility was designed and constructed to treat a minimum of 15,000 tonnes of liquid waste per annum, which was granted by an Environment Protection License (EPL), by the NSW EPA. Council granted consent in November 1998 and restricted the facility to treat only 5,000 tonnes per year.

In August 2010, Enviroking was granted an EPL (EPL 11180) to expand the facility to treat up to 20,000 tonnes of liquid waste per annum. The development will involve the following:

- An extension of the existing building to house the proposed treated effluent tanks, including bunding, workshop and truck wash bay area;
- An awning and extension to the existing building to cover the main access to the building and to enclose the existing sludge pit and provide cover over the existing truck receival pit; and
- Upgrading the ventilation systems within the treatment building.

The structure of the Enviroking EMS is attached on the next page.

## 2 SCOPE AND OBJECTIVES

The Enviroking Liquid Waste Facility Environmental Management Strategy (EMS) has been prepared in accordance with the requirements of development approval 07\_0048 granted under section 75J of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The EMS shall include, but not necessarily be limited to:

- Provide an overall framework for environmental management;
- Identify the statutory approvals that apply to the project;
- Describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;
- Detail procedures for regular contamination testing of output waste materials prior to disposal;
- Provide a plan depicting all the monitoring currently being carried out within the project area;
- Describe procedures implemented to inform local community and relevant agencies, complaints management, dispute resolution, non-compliance and emergencies response; and
- Include copies of the various strategies, plans and programs that are required under the conditions of this approval once they have been approved.

### 3 PERFORMANCE CRITERIA

Schedule 3 Condition 1 to 6 of the Project Approval (PA 07\_0048) outlines the key EMS requirements for the site (see **Table 1**).

**Table 1 – Environmental Management System Requirements of PA 07\_0048 (Schedule 4 Condition 1)**

Condition	Consent Requirement	Section in EMS Document
a)	be submitted to the Director-General for approval within 6 months of the date of this approval;	-
b)	provide the strategic framework for environmental management of the project;	Section 7.4
c)	identify the statutory approvals that apply to the project;	Section 4
d)	describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project;	Section 5
e)	include procedures for regular testing of output waste materials to check for contamination prior to disposal;	Section 8
f)	describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the project;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the project;</li> <li>• respond to any non-compliance; and</li> <li>• respond to emergencies;</li> </ul>	Section 9
g)	<ul style="list-style-type: none"> <li>• copies of the various strategies, plans and programs that are required under the conditions of this approval once they have been approved; and</li> <li>• a clear plan depicting all the monitoring currently being carried out within the project area.</li> </ul>	Appendix 8

### 4 STATUTORY OBLIGATIONS

#### 4.1 Approvals, Licenses, Permits and Leases

All activities associated with the Enviroking Liquid Waste Facility will be undertaken in accordance with the following approvals and licenses that have been issued:

- *Project Approval No. 07\_30048 by the Minister for Planning under Section 75J for the Environmental Planning and Assessment Act 1979 (see Appendix A);*
- *Development Application 118/697/181 by Cessnock City Council (November 1998); and*
- *Environment Protection License 11180 & 11245 issued by the NSW Office of Environment and Heritage under Section 55 of the Protection of the Environment Operations Act 1997.*

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## 4.2 Relevant Legislation

Key legislation includes the following Acts and their respective regulations.

- *Environmental Planning and Assessment Act 1979 and Regulations 2000;*
- *Environment Protection Biodiversity Conservation Act 1999;*
- *National Parks and Wildlife Act 1974;*
- *Occupational Health and Safety Act 2000;*
- *Protection of the Environment Administration Act 1999;*
- *Protection of the Environment Operations Act 1997 ad Regulations (General) 1998;*
- *Soil Conservation Act 1938;*
- *Threatened Species Conservation Act 1995;*
- *Waste and Avoidance Recovery Act 2001;*
- *Water Act 1912; and*
- *Water Management Act 2000.*

## 4.3 Relevant Guidelines and Exemptions

The following guidelines are, or are potentially, of relevance to the liquid waste recycling facility.

- *Cessnock Council Development Control Plan 2010;*
- *Cessnock Council Local Environmental Plan 2011;*
- *NSW DECCW 2009, Waste Classification Guidelines Part 1: Classifying Waste;*
- *NSW DEC 2004, Managing Urban Storm water;*
- *NSW EPA 2008, The Food Waste Exemption;*
- *NSW EPA 2008, The Effluent Exemption;*
- *NSW EPA 2008, The Treated Grease Trap Waste Exemption;*
- *NSW EPA 1999 Contaminated Sites: Guidelines of Significant Risk of Harm from Contaminated Land and the Duty to Report; and*
- *NSW OEH 2012 Enviroking Solid Treated Grease Trap Waste Exemption.*

## 5 ROLES AND RESPONSIBILITIES

The Director is responsible for the overall environmental performance of the Enviroking Liquid Waste Facility and has direct environmental responsibility for areas under his control as well as provides direction and advice to ensure site environmental conformance is maintained. All Enviroking employees have a responsibility to manage operations in an environmentally responsible manner and report any incidents or take action to minimise the impacts from the facility's operations. All environmental incidents will be reported to the Director.

**Figure 1** shows a flow chart of Enviroking's Staff.

## Enviroking Staff Flow Chart

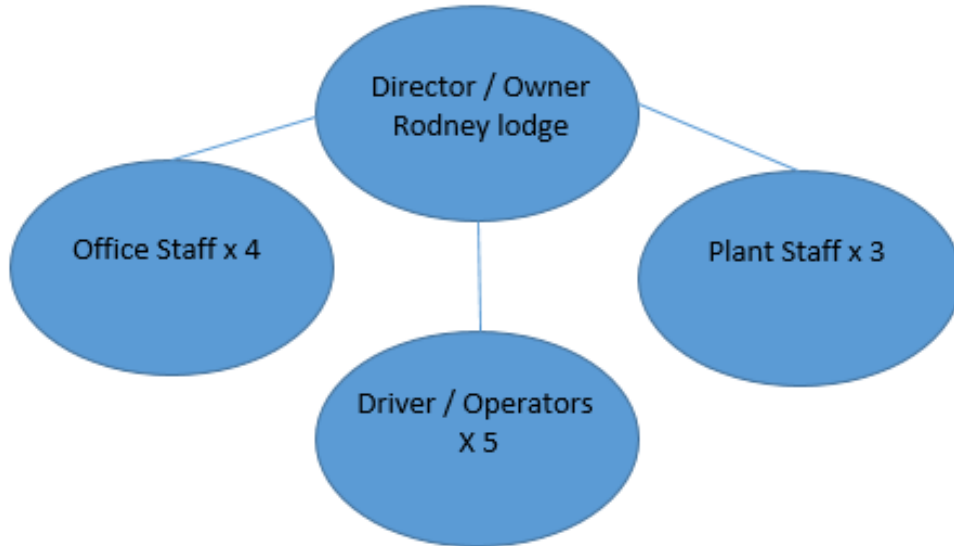


Figure 1 – Enviroking’s Staff Flow Chart

### Site Management

- Ensure staff are trained and aware of environmental management procedures;
- Ensure this EMS is fully implemented;
- Undertake inspections in accordance with **section 7.5**; and
- Project management at site.

### Contractors

- All contractor personnel are to be fully trained and aware of relevant requirements;
- Undertaking measures to minimise the environment and community impact from the operation; and
- Ensure appropriate management of wastes and material during transport and disposal.

### All Personnel

- Responsible for implementing the requirements of the *EMS* and ensuring effective implementation with respect to their work area; and
- Report environment and community incidents as soon as possible to immediate supervisor and ensure incident reports are completed.

## 6 POTENTIAL ENVIRONMENTAL IMPACTS

### 6.1 Environmental Aspect Analysis

To assist in developing relevant environmental procedures to guide environmental management on the site, the main activities undertaken by Enviroking have been identified along with any associated potential environmental impacts. **Appendix 4** contains the environmental aspects register with the associated risk rankings for all activities (environmental risk register) along with the appropriate controls.

The following section outlines the methodology used to identify and assign environmental risk to the various aspects across the site.

Activities at site were broken into three main areas:

- Transport of material to site;
- Receival and Processing of Food and Grease Trap Waste/ Receival and Processing of Oily Waters; and
- Application of treated material to designated farms.

Key environment and community aspects were broken into the following areas:

- Air pollution;
- Erosion and Sediment Control/Water Management;
- Groundwater;
- Contaminated Land and Spill Response;
- Ecology;
- Weeds;
- Noise;
- Sludge Waste;
- General waste;
- Visual;
- Aboriginal Heritage;
- European Heritage;
- Bushfire Risk; and
- Odour.

### 6.2 Risk Ratings

The following section briefly outlines the methodology used to assign a specific Environmental Risk Rating to each aspect of the Enviroking operation. Risk assessment is the formalised means by which hazards and associated dangers are systematically identified, assessed, ranked according to perceived risk and addressed by means of appropriate and effective controls.

Environmental Risk is the likelihood of an unplanned incident occurring that will have an adverse impact upon the environment. The impact will vary in consequence from *Catastrophic* (a major event which could cause severe damage to the environment) through to *Insignificant* (no

detrimental impact on the environment is measured or envisaged). The Environmental Risk Rating is measured in terms of consequence (severity) and likelihood (probability) of the event happening.

The allocation of a consequence rating was assigned by way of consensus based on the Enviroking definitions contained in the following section below.

### Environmental Consequence

The allocation of an Environmental Risk Rating was based on the Enviroking Environmental consequence definitions contained in the following table:

**Table 2 – Consequence Criteria**

Rating	Financial impact US\$ EBIT	Property Damage US\$	Investment Return US\$ NPV	Health and Safety	Environment	Community / Reputation	Legal and Compliance
5	\$100m+ loss or gain	\$20m+	\$600m + loss or gain	<ul style="list-style-type: none"> <li>Multiple fatalities and/or</li> <li>Significant irreversible effects to 10's of people</li> </ul>	<ul style="list-style-type: none"> <li>Category 5 – an incident that has caused disastrous environmental impact with long term effect requiring major remediation</li> </ul>	<ul style="list-style-type: none"> <li>Prominent negative International media coverage over several days.</li> <li>Significant negative impact on share price for months.</li> </ul>	<ul style="list-style-type: none"> <li>Major litigation or prosecution with damages of \$50m+ plus significant costs.</li> <li>Custodial sentence for company Executive</li> <li>Prolonged closure of operations by authorities.</li> </ul>
4	\$20m - \$99.9m loss or gain	\$2m - \$19.9m	\$80m - \$599.9m loss or gain	<ul style="list-style-type: none"> <li>Single fatality and/or</li> <li>Severe irreversible disability (Permanent Disabling Injury) or illness to one or more persons</li> </ul>	<ul style="list-style-type: none"> <li>Category 4 – an incident that has caused serious environmental impact with medium term effect requiring significant remediation</li> </ul>	<ul style="list-style-type: none"> <li>National media coverage over several days.</li> <li>Significant negative impact on share price for weeks</li> <li>Community / NGO legal actions.</li> <li>Impact on local economy</li> </ul>	<ul style="list-style-type: none"> <li>Major litigation costing \$10m+ and</li> <li>Investigation by regulatory body resulting in long term interruption to operations.</li> <li>Possibility of custodial sentence.</li> </ul>
3	\$2m – \$19.9m loss or gain	\$200k - \$2m	\$8m – \$59.9m loss or gain	<ul style="list-style-type: none"> <li>Serious bodily injury or illness (eg fractures) and/or Lost Time Injury &gt; 2 weeks</li> </ul>	<ul style="list-style-type: none"> <li>Category 3 – an incident that has caused moderate reversible environmental impact with short term effect requiring moderate remediation</li> </ul>	<ul style="list-style-type: none"> <li>Local media coverage over several days</li> <li>Negative impact on local economy.</li> <li>Persistent community complaints.</li> </ul>	<ul style="list-style-type: none"> <li>Major breach of legislation with punitive fine.</li> <li>Significant litigation involving many weeks of senior management time.</li> </ul>
2	\$200k – \$1.9m loss or gain	\$10k - \$199.9k	\$800k – \$5.9m loss or gain	<ul style="list-style-type: none"> <li>Medium term largely reversible injury or illness to one or more persons</li> <li>Restricted Work Injury</li> <li>Lost Time Injury &lt; 2 weeks</li> </ul>	<ul style="list-style-type: none"> <li>Category 2 – an incident that has caused minor reversible environmental impact requiring minor remediation</li> </ul>	<ul style="list-style-type: none"> <li>Local media coverage.</li> <li>Complaint to site and/or regulator.</li> </ul>	<ul style="list-style-type: none"> <li>Breach of legislation with investigation or report to authority with prosecution and/or moderate fine possible.</li> </ul>
1	<\$200k loss or gain	<\$10k	<\$599.9k loss or gain	<ul style="list-style-type: none"> <li>First aid treatment or medical treatment</li> </ul>	<ul style="list-style-type: none"> <li>Category 1 – an incident that has caused negligible reversible environmental impact requiring very minor or no remediation</li> </ul>	<ul style="list-style-type: none"> <li>No media coverage.</li> <li>No community complaints.</li> </ul>	<ul style="list-style-type: none"> <li>Minor legal issues, non-compliances and breaches of legislation.</li> </ul>

### Probability of an Incident occurring

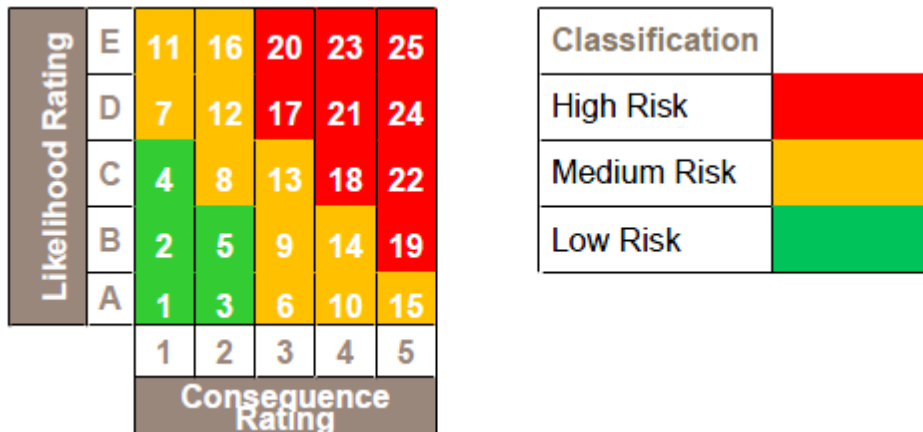
The likelihood (or probability) of each impact occurring was also rated according to the following Enviroking definitions, as set out in **Table 3**:

**Table 3 – Likelihood Criteria**

Category	Criteria
E	<ul style="list-style-type: none"> <li>- 99% probability, or</li> <li>- impact is occurring now, or</li> <li>- could occur within months</li> </ul>
D	<ul style="list-style-type: none"> <li>- &gt;50% and &lt;99% probability, or</li> <li>- balance of probability will occur, or</li> <li>- could occur annually</li> </ul>
C	<ul style="list-style-type: none"> <li>- &gt;20% and &lt;50% probability, or</li> <li>- may occur shortly but a distinct probability it won't, or</li> <li>- could occur in 2 to 5 years</li> </ul>
B	<ul style="list-style-type: none"> <li>- &gt;1% and &lt;20% probability, or</li> <li>- may occur but not anticipated, or</li> <li>- could occur within 5 to 20 years</li> </ul>
A	<ul style="list-style-type: none"> <li>- &lt;1% probability</li> <li>- occurrence requires exceptional circumstances</li> <li>- exceptionally unlikely, even in the long term future</li> <li>- occurs less than once every 20 years</li> </ul>

Environmental Risk Matrix

Risk rankings were allocated for each environmental aspect using the Enviroking “ranking matrix” method below. By using the “consequence” and “probability” rating a risk classification was assigned between one (1) and twenty five (25), with one (1) being the highest risk and twenty five (25) the lowest.



Risk Classification System

A Risk Rating class was then applied to each aspect using the Risk Classification System included on the matrix above. In accordance with this risk classification system, one of the following Environmental Risk Ratings was assigned to each aspect:

- **H (high)** being a Class 1 Risk requiring immediate management attention.
- **M (moderate)** being a Class 2 Risk - acceptable with current controls but requires attention if controls absent or ineffective - where practicable develop other controls to mitigate the risk.
- **L (low)** being a Class 3 Risk - assess and control as required.

The aim was to have as many of the Environmental Risk in the Low (Class 3) rating as possible. Where necessary to lower the apparent risk rating, appropriate controls were implemented (see section below).

Assessment of Effectiveness of Controls

Risk Rankings were allocated for each environmental aspect, based on three (3) separate scenarios. The first considering **no controls**, which is a measure of the *raw* risk associated with the activity. The second considered the risk rating with the **current controls** (i.e. in place at the time of the Environmental Risk Assessment), and finally where the associated environmental risk was still considered too high, **additional controls** were recommended for the consideration of Enviroking. These were included in the Environmental Risk Register (**Appendix 4**) as possible controls to be considered by Enviroking.

Two types of controls are considered in the context of an Environmental Risk Assessment. A control is considered to be either a hard engineering control (e.g. bunds, diversions, etc) or administrative control (e.g. work procedure(s) and/or management plan).

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## 7 ENVIRONMENTAL MANAGEMENT ELEMENTS

### 7.1 Environmental Policy

The Environmental Policy for Enviroking represents a statement of its intentions and principles in relation to its overall environmental performance, and represents commitment from Enviroking to implementation of this EMS. The Policy has been designed to fulfil the expectations of all stakeholders in the project. A copy of the Environmental Policy is contained in **Appendix 3**.

The Environmental Policy aims to:

- Wholly support and comply with or exceed the requirements of current environmental legislation and codes of practice.
- Minimise our waste and then reuse or recycle as much of it as possible.
- Minimise energy and water usage in our buildings, vehicles and processes in order to conserve supplies, and minimise our consumption of natural resources, especially where they are non-renewable.
- Operate and maintain company vehicles (where appropriate) with due regard to environmental issues as far as reasonably practical and encourage the use of alternative means of transport and car sharing as appropriate.
- Apply the principles of continuous improvement in respect of air, water, noise and light pollution from our premises and reduce any impacts from our operations on the environment and local community.
- As far as possible purchase products and services that do the least damage to the environment and encourage others to do the same.

Personnel on site have access to copies of the Environmental Policy, as they are located in all office areas and crib rooms. In addition, copies can be made available to any employee and external interested parties by contacting the Manager.

The Environmental Policy will be reviewed for its continuing appropriateness and applicability during the management review of the EMS.

### 7.2 Environmental Management Plans

The following Environmental Management Plans have been developed to assist in the management of potential environmental issues at the site:

- Waste Management Plan;
- Bushfire Management Plan;
- Pollution Incident Response Management Plan; and
- Odour Management Plan.

### **7.3 Environmental Training and Awareness**

The Director is responsible for:

- Ensuring that the processes and resources exist to adequately train all employees and contractors in the relevant environmental policy and environmental management plans for the operation;
- Participating and running Toolbox talks and other such forums where environmental training and awareness can be undertaken; and
- Maintaining records of all environmental training and awareness sessions, including but not limited to, attendees and the topic of discussion.

All employees will undertake a New-Starter Induction prior to their commencement of works at the site. The induction will include, but not be limited to, information related to the Enviroking Environmental Policy, various aspects of the EMS and will emphasise the roles and responsibilities of employees and contractors.

The Director shall undertake regular toolbox talks to discuss relevant environmental issues with the workforce. Additional Toolbox sessions should be scheduled if a particular environmental issue needs to be brought to the immediate attention of the workforce (e.g. following a major environmental incident).

### **7.4 Document Control**

This EMS (including the attached Environmental Forms and Management Plans) will be retained in a controlled format at the site by the Director. Management, retention, revision and superseding of environmental documentation are the responsibility of the Site Manager.

The purpose of establishing and maintaining procedures for controlling all EMS documentation is to ensure that all documents can be located, reviewed and revised as necessary and current and obsolete documents easily identified.

The Director is responsible for ensuring that the EMS is controlled in accordance with the procedure detailed below.

### **7.5 Audits and Inspections**

The following inspections are completed at the Enviroking Facility.

- Daily inspection of the operation by senior plant staff. Any issues are noted and actioned.
- Plant staff are responsible for conducting initial visual and odour inspections of each truckload of liquid waste delivered to the site.
- Weekly run sheet completed by the plant representative. Any issues are noted and actioned.
- Monthly environmental inspection of the operation. Any issues are noted and actioned.

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Schedule 4 Condition 4 and 5 of the Project Approval outlines the requirement to complete an Independent Environmental Audit.

**Schedule 4 Condition 4**

Within 2 years of this approval, and every 3 years thereafter, unless the Director-General directs otherwise, the Proponent shall commission and pay the full cost of an Independent Environmental Audit of the project. This audit must:

- a) be conducted by a suitably qualified, experienced, and independent team of experts whose appointment has been endorsed by the Director-General;
- b) assess the environmental performance of the project, and its effects on the surrounding environment;
- c) assess whether the project is complying with the relevant standards, performance measures, and statutory requirements;
- d) review the adequacy of any strategy/plan/program required under this approval; and, if necessary; and
- e) recommend measures or actions to improve the environmental performance of the project, and/or any strategy/plan/program required under this approval.

**Schedule 4 Condition 5**

Within 3 months of submitting the audit report to the Director-General, the Proponent shall review and if necessary revise the strategies/plans/programs required under this approval, to the satisfaction of the Director-General.

The results of the independent audit, as well as internal audit of the facility, EPL and any other approval conditions, will be submitted to the Director-General and OEH (included in EPL 11180 Annual Return). The independent audit will also be provided to Cessnock City Council, relevant agencies and for public review, if necessary.

## **8 WASTE MANAGEMENT**

Enviroking Liquid Waste Facility produced five (5) types of typical waste stream from the operation (see **Table 4**). In practice, the majority of the wastes produced are reused beneficially, with only one waste stream will be taken for offsite disposal.

The key objectives for optimal waste management for Enviroking is as follow:

- To minimise waste production;
- To maximize re-use or recycling opportunities;
- To implement methods that minimise waste generated by the facility;
- To dispose of waste in compliance with applicable guidelines or licenses; and
- To ensure the storage of fuels, oils or other potential contaminants is appropriate and in accordance with applicable guidelines or licenses.

Regarding the treatment and processing of waste on site refer to Enviroking Pty Ltd “Waste Receival Procedure”.

## 8.1 Monitoring Program

The monitoring program detailed in **Table 4** will be utilized to monitor the quality, type and source of waste received on site and generated by the facility.

**Table 4 – Waste Monitoring Program for all Waste Streams**

Waste Type	Reuse/Disposal Option	Monitoring Regime	Frequency	Responsibility
Treated Effluent Water	Beneficial reuse by exempted irrigation or disposal to Hunter Water Sewage Treatment Plant	Initial Characterization of Material Testing followed by routine testing against "The Effluent Exemption 2008"	Once-off sampling for characterization purposes followed by monthly, quarterly, biannual or yearly sampling depending on the contaminant and its' strength.	Enviroking
Organic Sludge	Exempted land application for agricultural benefit	Routine and Once-off sampling and testing against "Enviroking Solid Treated Grease Trap Waste Exemption"	Routine Sampling; 4 composite samples per month (one individual sample per day) and one composite sample per month (5 random individual samples).  Once-off sampling; one composite sample per truckload.	Enviroking
Floating Fatty Matter	Heating and refinement for sale as tallow or biodiesel conversion.	For food waste, no testing is required.	-	
Floating Oil	Sale to oil recyclers.	No testing is required for floating oil material to be sent to mineral oil recyclers. Oil recyclers will be conducting separate testing regime prior to reuse.	-	Oil Recyclers
Grit, sand and solids	Solidification and immobilisation for landfill	Characterization testing in accordance to <i>Waste</i>	One sample per truckload.	Enviroking

Waste Type	Reuse/Disposal Option	Monitoring Regime	Frequency	Responsibility
		<i>Classification Guidelines Part 1: Classifying Waste (DECCW, 2009)</i> prior to disposal.		
Other wastes (eg. office waste)	All other waste will be reuse or recycle if possible. Separate recycle bins are provided within the facility. All non-recyclable waste will be taken offsite for landfill disposal	Non-general office waste for disposal will be tested in accordance to <i>Waste Classification Guidelines Part 1: Classifying Waste (DECCW, 2009)</i> prior to disposal.	One sample per truckload.	Enviroking

The monitoring program for each individual type of waste generated also acts as a quality control measure and must be followed and complied with to ensure the quality of all output material are maintained.

The following records of all environmental monitoring and results are kept on site and made readily available:

- The date(s) on which the sample was taken;
- The time(s) at which the sample was collected;
- The point at which the sample was taken;
- The name of the person who collected the sample;
- Analytical data of each sample analysed;
- All reports detailing compliance or non-compliance of each sample; and
- Chain of custody documentation and NATA certificates.

## 8.2 Waste Tracking System

A waste tracking system to record all types of waste, quantities and disposal/reuse method for all waste streams will be implemented at Enviroking. The record can be maintained in the form of a spreadsheet to obtain and keep track of all the following information:

- Untreatable/Unrecyclable waste taken directly to landfill;
- Disposal quantities of all wastes;
- Classification of any hazardous or industrial waste; and
- Disposal weights of solid and recycling wastes removed by general waste contractor.

This waste tracking system leans towards a better waste management system and allows the establishment of standard/normal and consistent waste levels. Records of waste quantities will allow Enviroking to assess the performance of its operations in line with the above waste management principles to avoid and minimise waste requiring landfill.

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## 9 COMMUNITY ISSUES

### 9.1 Community Involvement and Information Dissemination

Enviroking is aware of its community obligations and the need to engage with various stakeholders. Enviroking is committed to being recognised as responsible members of the community and will undertake consultation with local residents, landowners and the broader community to keep them informed of its operations, plans and environmental performance.

This will be achieved by the following activities:

- i) Distribution of letters and updates when changes occur;
- ii) Verbal contact via the phone or face to face with direct neighbours;
- iii) Enviroking will advertise site phone number locally and telephone complaints line (Tel: 02 4930 3000 & Mobile: 0408 303 000);
- iv) Informal discussions with various stakeholders as required;
- v) Provisions of relevant plans, reports and monitoring results if requested by local community;
- vi) In the event of non-compliance or a potential non-compliance, reports will be provided to relevant authorities.
- vii) Preparation and submission of Annual Return documents comprising:
  - a) Statement of Compliance;
  - b) Summary of complaints receive during the past year and the corrective actions undertaken;
  - c) Summary of monitoring results collected during the past year;
  - d) Identify and discuss any non-compliance during the previous year; and
  - e) Description of actions undertaken or will be undertaken to ensure compliance.

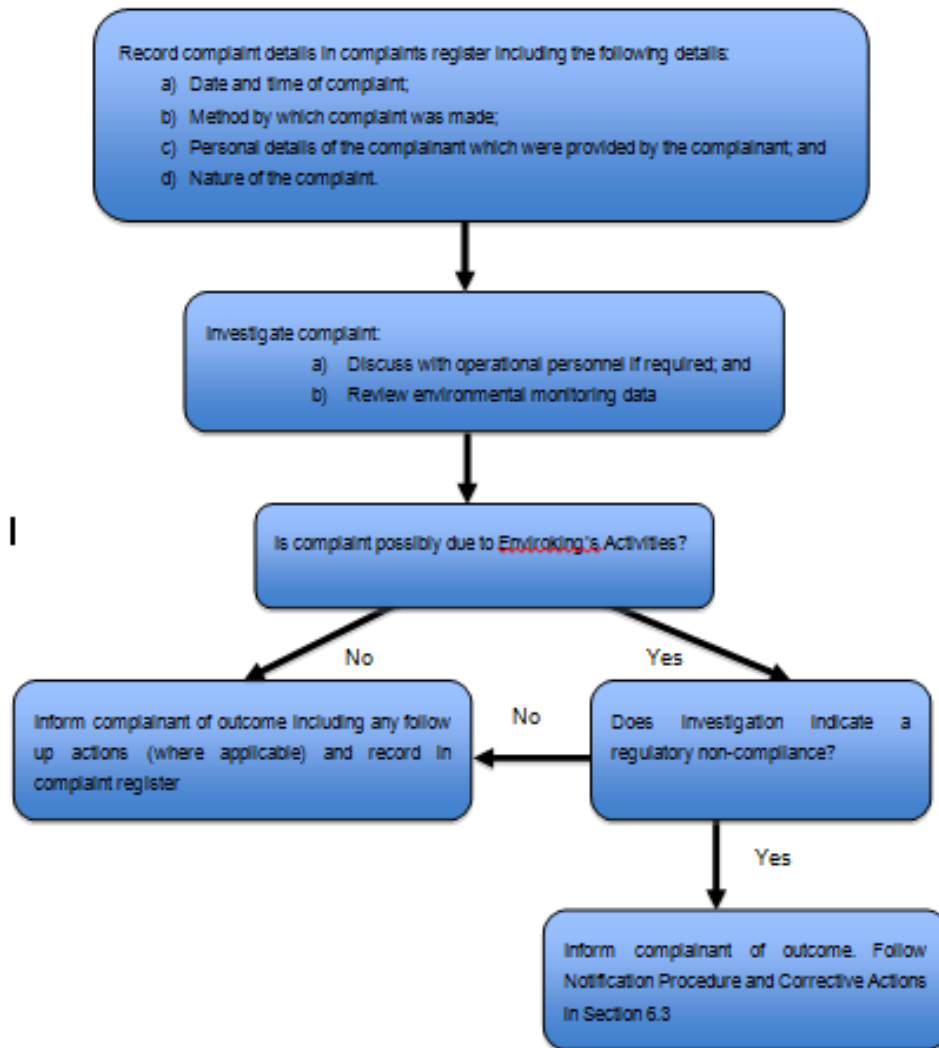
The above represents the current community consultation practices of the facility, consisting of both proactive and reactive community involvement.

### 9.2 Complaint Protocol

All complaints made by the community must be recorded and registered in a complaints register maintained by Enviroking. The nature of the response for each complaint will depend on the nature and source of the complaint but will include the procedures shown in the **Figure 2**.

Complaint records are kept for at least two (2) years after the complaint was made and will be available to any authorised officer of the Office of Environment and Heritage who may require details. Summary of complaint records are also provided in the Annual Return document.

If necessary, Enviroking will conduct a follow-up interview with the complainant (if possible) to determine their level of satisfaction with the Enviroking's response and the resultant outcome. If no actions were taken by the management to handle the complaint, the reasons why no action was taken must be recorded.



**Figure 2 – Complaint Protocol for Enviroking**

### 9.3 Dispute Resolution

In the event that any complainant does not consider Enviroking's response or reactions adequately address their concerns, the following procedure will be adopted.

A meeting will be convened with Enviroking's Director to seek resolution of the matter. The complainant will be provided with a written response from Enviroking detailing the results of investigations to date and the agreed actions to be taken in respect of the measures to be implemented.

On implementation of the nominated measures, a further meeting will be convened to determine the level of satisfaction with the outcomes.

If the matter cannot be resolved, the Director-General will refer the matter to the Independent Dispute Resolution Process presented in **Figure 2** and adopted from the Department of Planning.

#### **9.4 Non-Compliance/Incident Response**

Any non-compliance with regulations, licenses or approvals will be reported to the relevant authority, together with details of the corrective actions taken to avoid future occurrences. Areas of potential non-compliance, which have the potential to cause environmental harm or results in complaints, will also be reported to the relevant authority.

Any environmental monitoring results indicating exceedances of adopted relevant criteria/thresholds are considered as non-compliance as well. Enviroking will conduct an investigation into the potential sources and/or causes. If Enviroking is responsible for the exceedance, further actions will be taken to address the matter.

In all cases of non-compliance, the Director must be notified immediately, followed by the appropriate corrective action. All non-compliance must be recorded including the corrective actions taken to rectify the problem.

Details of environmental incidents and non-compliances will be recorded in **Appendix 6**. The investigation will consider any plant operation, waste transportation or other factors that may have resulted in the non-compliance. The report will be provided to Department of Planning and Infrastructure or other relevant agencies (OEH, Cessnock City Council) within 7 days of detecting non-compliance criteria. Should the non-compliance event is significant and caused a pollution event or will potentially cause a pollution event (land application of treated waste), Enviroking must notified OEH immediately regarding the non-conformance. Any significant incident/non compliance will be managed as per the Pollution Incident Response Management Plan.

All non-compliance must be recorded and documented including the following details:

- Date and time of non-compliance;
- The cause or likely cause of the non-compliance (nature of the non-compliance);
- Personal details of the personnel involved in the non-compliance;
- Corrective action that has been taken to date;
- Proposed measures to address the exceedance including any follow-up contact with the non-compliance; and
- If no action was taken by the management, the reasons why no action was taken.

Non-compliances with the requirements of EPL 11180 & EPL 11245 will also be reported in the Annual Return document.

In the unlikely event that there is a potential threat to surrounding property owners and occupiers, Enviroking will notify those likely to affected. Enviroking holds a list of surrounding property owners and occupiers' contact details.

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## 9.5 Emergency Response

Enviroking maintain an emergency procedure plan that is reviewed and updated annually. The plan identifies the major sources of environmental risk arising from accident or mishap at the facility and identifies the best procedures to minimise such risk. Enviroking's Director is responsible in ensuring that all staff is aware of and trained in the proper responses identified by the plan. A copy of Enviroking's Emergency Plan is attached in **Appendix 8**.

The emergency plan includes the following information:

- i) Identification of risk as having potential environmental impact;
- ii) Register of emergency equipment within the premises and its location;
- iii) Procedures and responses policies;
- iv) Spill responses procedures; and
- v) Enviroking's emergency contact details.

### 9.5.1 Procedures and Responses

#### a) Prevention

The following general checklist summarises preventative equipment and maintenance procedures:

- Bunds are intact, not cracked or broken;
- Fire fighting equipment is 'in test' and or complete and properly maintained;
- Hoses, taps and transfer lines are in proper working order;
- Personal emergency equipment is intact and complete;
- Absorbent materials are replenished; and
- All staff should immediately report to the Director if any observation of equipment fault, improper location, faulty or suspect procedure that could cause any risk or potential risk of emergency, accident or safety breach.

#### b) Responses Policies

Enviroking practice the correct response priorities in all circumstances in the following order:

- i) Ensure personal safety and that of workmates or visitors;
- ii) Notify Director immediately;
- iii) Take steps to contain or minimise the impact of the accident only where safety is not compromised; and
- iv) Ensure the correct authorities are informed.

Enviroking is aware that it is the legal responsibility of the Director and/or staff to inform the authorities regarding the incident. In strict order, the priority shall be:

- 1) Ambulance or paramedical where injury has occurred or may occur;
- 2) Fire brigade where fire has or could occur;
- 3) Police where wider emergency may occur;

- 4) Office of Environment and Heritage where environmental risk may occur (This is a legal responsibility where Enviroking perceives that any degree of risk of air, water or land pollution may occur from the accident); and
- 5) Workcover NSW where personal injury has occurred.

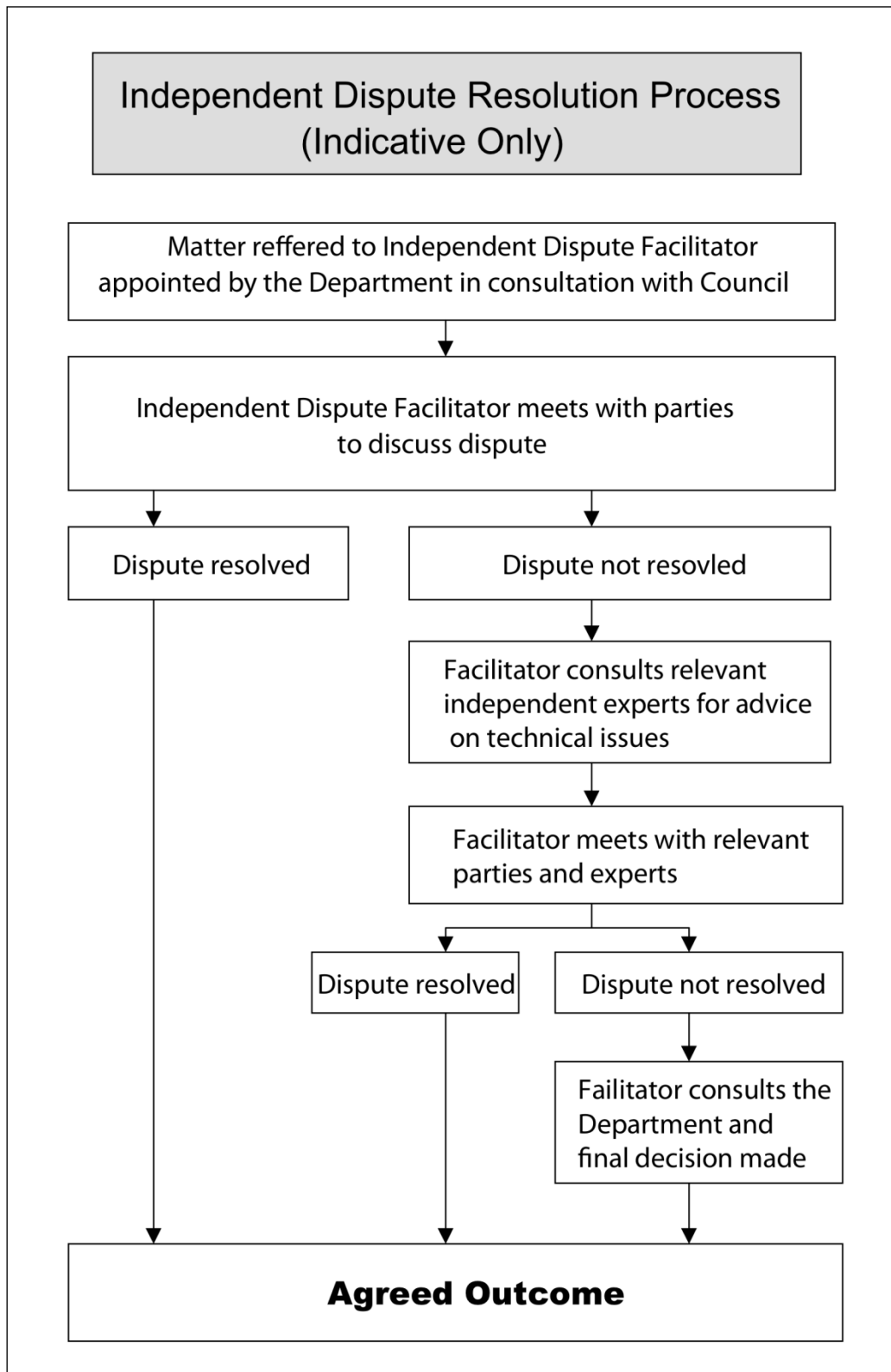


Figure 3 – Independent Dispute Resolution Process

## 10 MONITORING AND REVIEW

### 10.1 Monitoring

Regular monitoring is integral to the successful implementation of the EMS. The measurement and evaluation of criteria allows for the assessment of performance against quantitative and qualitative standards and assists in the identification of any non-conformances or areas that may require additional attention.

This EMS identifies a range of monitoring measures, including:

- Regular analysis of treated effluent and treated grease trap waste (organic sludge);
- Waste Classification analysis for waste material bound for landfill prior to disposal; and
- Recording details of all monitoring results.

As discussed in **Section 8.2**, a waste tracking system will allow the establishment of standard/normal waste levels and trends in waste disposal. Enviroking will be able to review the data over time and assess the waste performance of the operation to design programs and better waste management options for the facility to minimize waste production and meet waste avoidance.

Environmental monitoring is vital to ensure Enviroking's operation is compliance with all statutory, legislative and approval requirements including the consent conditions and various licenses (EPL 11180 & EPL 11245). Enviroking will review all monitoring results on a regular basis and corrective actions will be taken where results or trends indicate non-compliance or risk of future non-compliance.

Records of all environmental monitoring and results are to be kept on site and made readily available and must include the following information:

- The date(s) on which the sample was taken;
- The time(s) at which the sample was collected;
- The location/point at which the sample was taken;
- The name of the person who collected the sample;
- Analytical data of each sample analysed;
- All reports detailing compliance or non-compliance of each sample; and
- Chain of custody documentation and NATA certificates.

An Annual Return Report is required to be submitted to OEH annually as part of the EPL condition. The Annual Return documents a Statement of Compliance with EPL 11180 and EPL 11245 and Monitoring and Complaints Summary. These reporting mechanisms allow Enviroking to review problems with any environmental issue and assess the effectiveness of their procedures.

### 10.2 EMS Review

This EMS should be reviewed regularly to ensure all operational activities are in compliance. The EMS will be reviewed annually after submission or more frequently if required. Any new activities

or proposed changes to the operation that may results in environmental problems or will alter the facility's operation significantly will be assessed to determine if changes are required to manage the impacts. The proposed operational changes may be of the following but not limited to:

- Increased type or quantity of incoming waste to be treated or treated liquid waste product;
- Changes in the waste treatment procedures that may caused potential environmental impact;
- Change of ownership;
- Transfer of EPL license;
- EPL license renewal;
- Revocation or surrender of EPL;
- Any non-compliance or complaint recorded regarding the inadequacy of the EMS; and
- Any pollution event caused by non-conformance.

The review process will include formalised procedures including independent audits, or consultation with relevant specialist where required.