PCA EXPRESS

OPERATIONAL ENVIRONMENTAL MANAGEMNET PLAN

Moorebank Precinct East

May 5, 2021

PCA EXPRESS
Warehouse 4A
MOOREBANK PRECINT EAST

PCA Express Warehouse Operational Environmental Management Plan

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ACRONYMS AND DEFINITIONS

Acronym / Term	Meaning
BMP	Bushfire Management Plan
CARs	Corrective actions request
CBD	Central Business District
CoC	Conditions of Consent
Commonwealth CoA	Commonwealth Conditions of Approval
DotEE	Commonwealth Department of the Environment and Energy
DPIE	Department of Planning, Industry and Environment
DPI	Department of Primary Industries
DPI Fisheries	NSW Department of Primary Industries Fisheries division
DPI Water	NSW Department of Primary Industries Water division
EIS	Environmental Impact Statement
EMS	Environmental Management System
Environmental Emergency	Any event that causes or has the potential to cause material harm to the environment. An environmental emergency is a Class 3 incident.
Environmental Incident	A set of circumstances resulting in harm, or potential harm, to the environment. Environmental incidents include pollution incidents and environmental emergencies. Environmental incidents may arise from natural (e.g. storm, wind or bushfire) or human factors.
EP&A Act	*Environmental Planning and Assessment Act 1979*
EPA	NSW Environment Protection Authority
EPRMP	Emergency Preparedness and Response Management Plan
EPBC Act	*Environmental Protection and Biodiversity Conservation Act 1999*
GFA	Gross floor area
GHG	Greenhouse gas
LCC	Liverpool City Council
LGA	Local Government Area
Material harm	Material harm is harm that: • Involves actual or potential harm to the health or safety of human beings or to • Ecosystems that is not trivial, or • Results in actual or potential loss or property damage of an amount, or amounts in • Aggregate, exceeding $10,000, (such loss includes the reasonable costs and • Expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).
Moorebank Precinct	Refers to the whole Moorebank intermodal precinct, i.e. the MPE and the MPW.

Acronym / Term	Meaning
MPE	Moorebank Precinct East
MPW	Moorebank Precinct West
NGER	National Greenhouse and Energy Reporting
OEH	Office of Environment and Heritage
Operational area / Operational footprint	Extent of operational activities for the operation of the Project
POEO Act	*Protection of the Environment Operations Act 1997*
Pollution Incident	A set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise (POEO Act).
PIRMP	Pollution Incident Response Management Plan
Rail link	Part of the MPE Stage 1 Proposal (SSD 6766), connecting the MPE site to the SSFL. The Rail link is to be utilised for the operation of the Proposal.
RMS	Roads and Maritime Services
SHEMS	Safety Health and Environmental Management System
SIMTA	Sydney Intermodal Terminal Alliance
SIMTA Precinct Owner	Qube Holdings (Qube)
SSD	State significant development
SSFL	Southern Sydney Freight Line
The Project	MPE Stage 1 and MPE 2 Project.

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1 BACKGROUND

1.1 Introduction

PCA Express is an Australian based and privately owned couriers' business with a strong presence in the Asia Pacific region. We provide flexible, comprehensive, and efficient solutions to our highly valued clientele by combining industry knowledge, highly skilled personnel and close ties with industry suppliers including major Air and Shipping Lines. We also have a strong global presence with longstanding agency agreements in over 26 countries.
In accordance with the slogan of PCA Express "Big or Small, we send it all"; the company became one of the key market share holders in intensive logistics market by offering outstanding customer service, favorable price, and efficient delivery. With the rapid development of e-commerce and global village effect, PCA Express encountered lots of opportunities and implemented innovative technologies to meet customers' demand. The online tracking system and online customer service promote the information flow between PCA Express and customers in both directions. Because of the mature management system, outstanding employment, and ongoing innovation, PCA Express became one of the key players in Australia couriers' market. With cumulative logistics network, PCA Express designs our transport solutions to fit the diverse and dynamic needs of our customers by tailoring our wide range of services (sea freight, airfreight and cartage management) to the specific needs of each valued client. Apart from those, PCA Express also provides door to door service and logistic counselling.

1.2 Context of the WOEMP

The operation of the MPE Precinct must be undertaken in accordance with the Conditions of Consent (CoC) and the approved Framework Operational Environmental Management Plan (FOEMP), which has been developed by Qube to manage potential environmental impacts resulting from operational activities.

CoC C6 (SSD 7628) requires that each warehouse operator operated under a Warehouse OEMP, which considers the potential environmental impacts resulting from the operation of the warehouse. This document addresses this requirement.

This WOEMP details how the environmental management requirements for PCA Express's (PCA) storage and distribution operation at warehouse 4A will be managed. The aim of the WOEMP is to document processes for implementation which are compliance with environmental legislation and how environmental risks associated with the operation are implemented. This Plan has been developed to be consistent with the requirements of the MLP OEMP, subplans and requirements.

PCA Express will be required to maintain records (e.g. waste, water and energy usage) and provide Qube with documentation of environmental inspections and procedures if requested.'

1.3 Site Description

The Moorebank logistics park is located 35 kilometres (south west) from the Sydney central business district. The site is located at Warehouse 4 of the Moorebank Logistics Park East Precinct on Moorebank Avenue (Shown in Figure 1). Warehouse 4 covers an area of 23,405m2 and is split in to two parts being 4A and 4B. The Warehouse is owned by Qube with PCA Leasing section 4A of the warehouse.

Figure 1: Location of Warehouse 4

PCA Express operates section A of Warehouse 4, which covers an area of approximately 10,905m2.

The PCA Express warehouse comprises:

- A container storage area
- 63m2 Main office, administration facilities and amenities on two levels
- 10,445m2 warehouse area.
- Car parking (42no. car parking spaces).
- Truck loading/unloading docks
- Internal parking for pick-up and delivery vehicles (PUD)
- Specialised sorting and conveyor equipment
- Hardstand areas that provide trailer parking spaces, external PUD parking spaces, vehicle maneuvering areas and access to the main internal site road
- Signage for business identification purposes, including backlit illuminated signage on each warehouse.
- Internal fit out, comprising racking and storage. Warehouse 4A comprises of:
    - 5no. dock levelers

Figure 2 shows the extent of the Warehouse 4 and its surrounding areas. The PCA Express operational Boundary covered by this WOEMP is indicated by the pink boundary line shown in Figure 2.

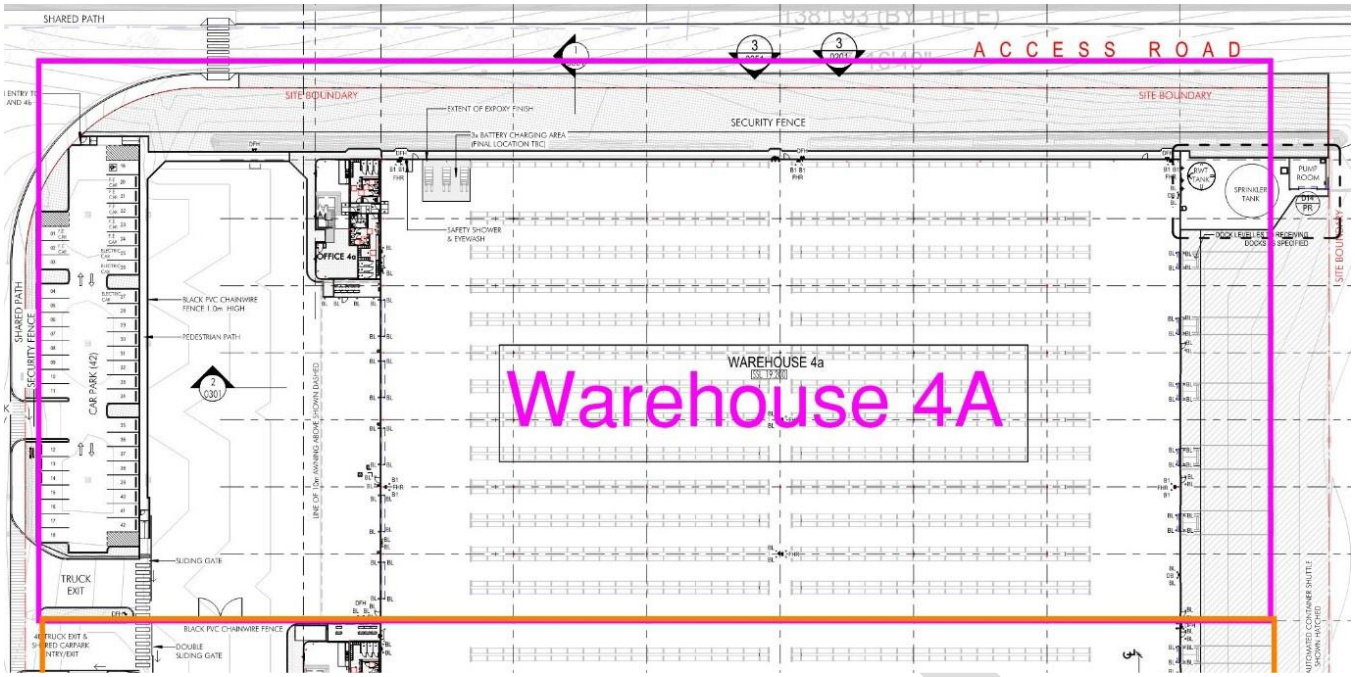

Figure 2 – Warehouse 4 – showing the location and operational boundary of Warehouse 4A.

General precinct infrastructure will be managed by Qube under the OEMP and includes pavements, stormwater detention and water quality treatment structures and devices, landscaping and lighting, and emergency services. Qube will also have operational control of common areas and assets outside the leased operational boundary indicated in Figure 2.

1.4 Purpose and Objectives

The objectives of this Warehouse OEMP are to:

- Identify and implement relevant environmental legal and other regulatory requirements applicable to the operation of the warehouse.
- Provide for the effective management of the environmental concerns and potential adverse environmental effects arising from the operation of the warehouse.
- Establish and define environmental roles and responsibilities.
- Identify appropriate impact mitigation measures and management strategies in response to potential adverse environmental effects.
- Provide warehouse personnel with sufficient information to undertake their operational activities in accordance with the development CoC, contractual, legal and other relevant environmental requirements.
- Ensure that the operational commitments of the CoC are captured and implemented on-site.
- Ensure that senior management and operational personnel understand their environmental duty of care under legislation and terms of the contract.
- Meet the requirements of, and align with, Qube's Environment Management System (EMS), as certified under AS/NZS ISO 14001:2015 Environmental Management System.

Implementing this warehouse OEMP effectively will enable Qube and the warehouse tenants to meet the regulatory and policy requirements in a systematic manner and to continually improve environmental performance.

2 TENANT / WAREHOUSE OPERATOR AND SITE OVERVIEW

2.1 Operator details

Environmental management responsibility for Warehouse 4A will be managed by:

Table 1 Operator details

Operator Details	
Name	PCA Express -PCA Supply Chain Solutions
Address	6C The Crescent, Kingsgrove NSW 2208
Contact person	JIE ZENG
Contact details	02 9925 7100

2.2 Description of Operations

PCA Express has a 12-year lease with Qube to operate warehouse and distribution activities from WH4A. Day to day activities include:

- Receipt and dispatch of goods from and to the IMEX terminal
- Packing and unpacking of containers
- Storage of goods
- Truck movements in and out of WH4A
- Forklift operation and
- General office administrative and support functions.

PCA Express's warehouse and distribution activities operate 8 hours, 5 days per week and employs approximately 20 people on a shift basis.

Typical plant and equipment used in the operation varies between the internal and external warehouse environment.

2.3 Plant and Equipment

Sound Power Levels (SWLs) associated with operational plant are identified in Table 2.

Table 2 Plant and equipment and associated sounds levels

Plant	Sound Power Level	Sound Pressure Level at 7m
Truck only	103	78
Forklifts	106	81
Pallet racking and wrapping	N/A	N/A

In accordance with CoCs B84 and B85 of SSD 7628, a Noise Assessment for Mechanical Plant and other noisy equipment must be undertaken and submitted to the Secretary to demonstrate that plant has been selected to meet the overall operational noise limits specified in the CoC.

3 ENVIRONMENTAL MANAGEMENT

3.1 Environmental Management Structure

Responsibility for Precinct environmental management sits with Qube in its function as the Project Delivery Company (PDC), established under arrangement with the Commonwealth Government. PDC is the entity responsible for delivering the development and is also tasked with the ongoing maintenance and environmental performance and reporting of the Precinct once it has been developed.

Qube has the additional responsibility of demonstrating tenancies do not exceed any hazardous materials screening thresholds in accordance with the Hazardous and Offensive Development Application Guidelines Applying SEPP 33 (Department of Planning, January 2011) as specified in CoC B114 and C6(b) for this WOEMP. This responsibility is considered further in section 3.3 of this WOEMP.

Qube has broad responsibility for site environmental management of operations and will work with PCA Express to support the achievement of the site environmental management objectives. This responsibility includes review of PCA's activities that have an interface with the common site environment and management controls, such as stormwater and drainage controls, and facilitating access to performance monitoring and reporting data that supports site-wide reporting obligations under the OEMP and CoC, including management of noise and air emissions.

Warehouse tenants, such as PCA, have responsibility for general building/ premises upkeep and maintenance, including any open space or ancillary warehouse use, integrated building signage and lighting and waste management.

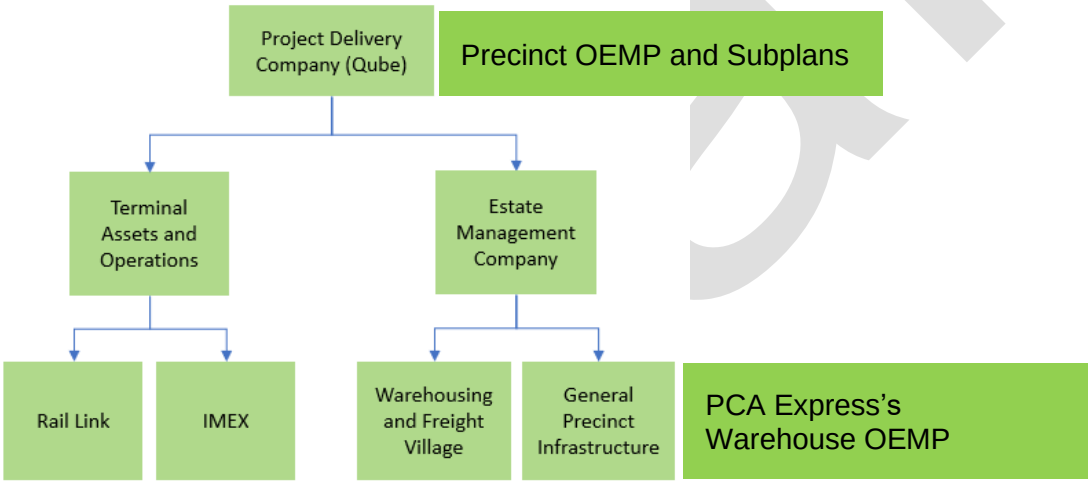

Figure 3 - Precinct management structure

The overarching precinct OEMP identifies the operational environmental management measures that will be implemented across the site for all site functions. Figure 3 shows the relationship between Qube, in its role as PDC and EMC, and PCA Express as the warehouse tenant. The WOEMP is identified as an environmental management plan operating beneath the precinct OEMP and focused on the warehouse operation.

The relationship between Qube's OEMP, required under CoC C3, and PCA Express's WOEMP, required under CoC C6, is demonstrated in Figure 4.

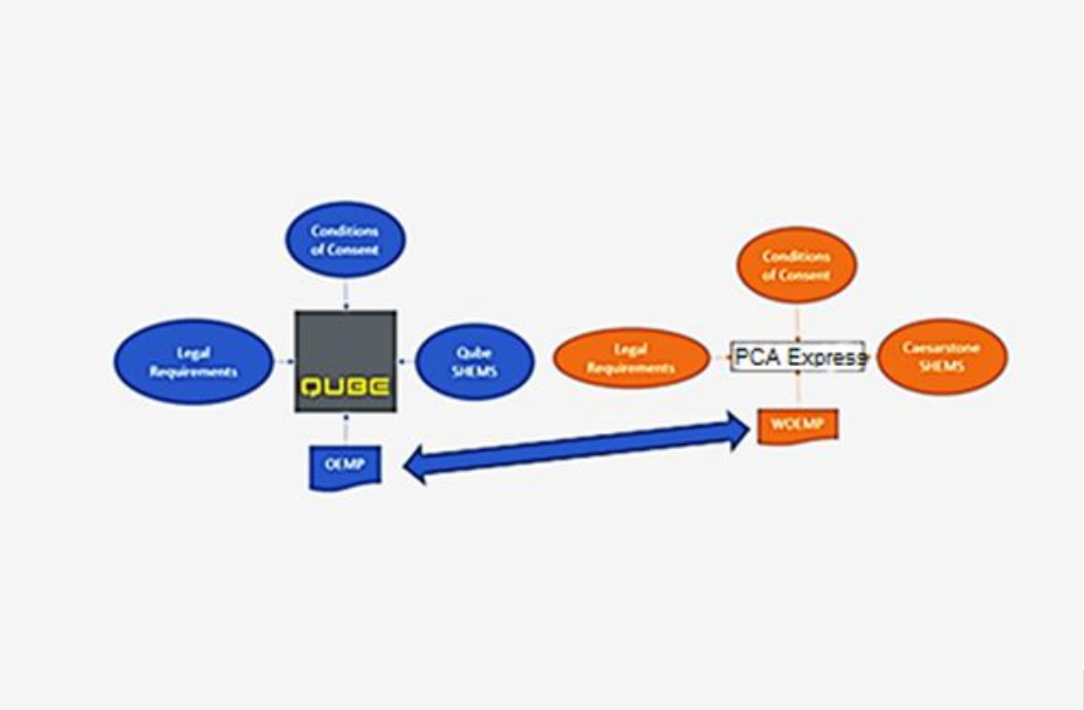

Figure 4 - Relationship between Qube's OEMP, required under CoC C3, and PCA's' WOEMP

Figures 3 and 4 identifies that PCA Express's WOEMP is:

- Aligned to the SSD 7628 conditions of consent
- Influenced by Qube's legal requirements and Safety Health and Environmental Management System (SHEMS) and
- In accordance with the Precinct OEMP.

Figure 4 also demonstrates that the WOEMP has been prepared to address PCA's legal requirements and its own SHEMS or requirements.

The WOEMP identifies a reporting and monitoring output to the Precinct OEMP to enable Qube/EMC to fulfil its monitoring, reporting and publication requirements under the CoC.

3.2 Environmental Management Responsibility

The principle responsibilities of PCA Express workers with respect to the environment are described below. The management structure is set out in the following diagram. A matrix of specific site responsibilities is set out in Table 3**,** below, and in figure 5.

Chief Executive
Responsibilities

- Promoting and maintaining good environmental management.
- Facilitate the effective implantation of the WOEMP.
- Provide support to the Site Manager and hold them accountable for their specific responsibilities.

Site Manager
Responsibilities:

- Taking all practical measures to ensure the site is operating according to this WOEMP, and without risks to the environment.
- For taking prompt remedial action to eliminate any non-compliance or environmentally risky conditions.
- Liaising with Qube Operations manager to ensure consistency with the requirements of the MLP SHEMS, the OEMP and subplans and providing environmental records and procedures if requested.

Site Supervisor
Responsibilities:

- Inducting all workers and subcontractors and directing site activities in accordance with this WOEMP
- Liaising with Qube Operations manager to provide environmental records, procedures and details of incidents if requested.
- Detecting any non-compliance or environmentally risky conditions.
    - If the Site Supervisor does not have the necessary authority to fix a problem, they are responsible for reporting the matter promptly and recommending remedial action.

Workers
Responsibilities:

- All workers are required to attend site inductions and
- Follow the direction of this WOEMP.
- Advising the Site Manager of any potential environmental issues

Subcontractors
Responsibilities:

- All subcontractors engaged to perform work for PCA Express are required, as part of their contract, to comply with this WOEMP and to comply with directions from the company's designated officers.
    - Failure to comply will be considered a breach of the contract and sufficient grounds for termination of the contract.

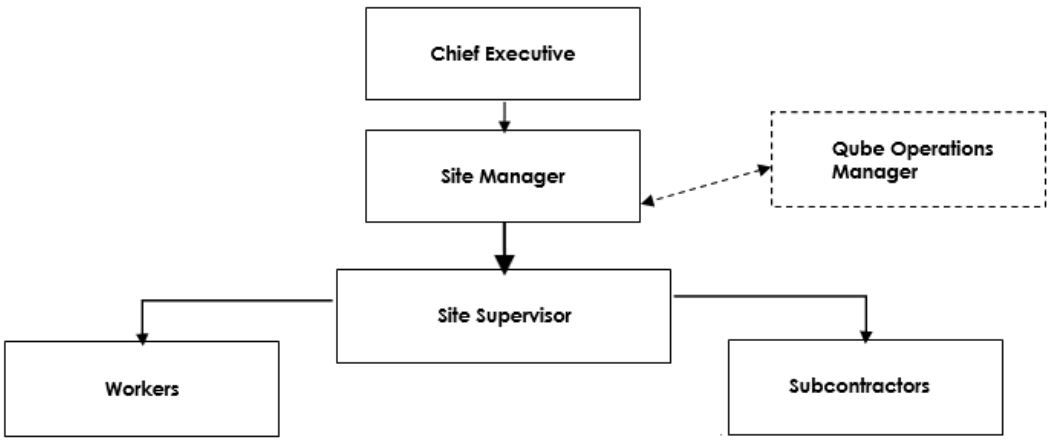

Figure 5 - PCA's Environmental Management Responsibility

3.3 Project Environmental Roles & Responsibilities Matrix

1 = has responsibility for the overall implementation and / or management of the process/procedure on the project
2 = has responsibility for complying with the process/procedure

TASK	Chief Executive	Site Manager	Site Supervisor	Workers	Subcontractors
Inducting workers and subcontractors and directing site activities in accordance with the WOEMP.	2	2	1	2	2
Identifying, assessing, and eliminating any non-compliance or environmentally risky conditions and documenting the risk controls implemented.	1	1	2	2	2
Promoting and maintaining good environmental management in accordance with the relevant environmental legislation, regulations, and laws.	1	1	2	2	2
Implementing practical measures to ensure the site complies with this WOEMP, Qube's OEMP, Hazard and Risk Management Plan and Emergency Response Plan.	2	1	2	2	2
Maintaining, providing updates, and supplying this WOEMP to relevant authorities and workers.	1	2	2	2	2
Monitoring and assessing subcontractors for the project to ensure environmental regulations are met and relate to the works undertaken	2	2	1	2	2
Maintaining stocks for environmental control (eg.Spill kits)	2	1	1	2	1
Provide and maintain a hazardous substance register for hazardous substances used and stored in the workplace;	1	1	1	2	2
Provide and maintain records (e.g. waste, water and energy usage) and provide Qube with documentation of environmental inspections, incidents and procedures if requested.	2	2	1	2	2

Table 3 – Environmental Responsibilities Matrix

3.4 Approval and Licensing Requirements

Licences, permits and approvals required for this site are summarised in the table below. PCA Express will ensure that any licences, permits and approvals are obtained. A copy of all licences, permits and approvals are included in Attachment 1 of this WOEMP.

Regulatory Authority	Licence / Permit / Approval Type	Status	Summary of Key Conditions and Monitoring Required
DPIE	SSD 7628 CoC	Compliant	Refer to Attachment 1
NSW EPA	EPL 21054	Compliant	Refer to Attachment 1

Table 4 Summary of Licenses and permits

3.5 Development Approvals

PCA's operations at WH4a are undertaken in accordance with SSD 7628 CoC. Table 5 below summarises the conditions pertaining to warehouse operations and where they are addressed in this document.

CoC SSD 7628	Requirement	Document Reference
General		
A2 – A4	Terms of consent defining operation of development	Note.
A12	Use of warehousing and distribution facilities	Section 1.3
A32	Plant and equipment maintained and operated in a proper and efficient condition and manner.	Section 2.3
C6	Preparation of WOEMP.	This WOEMP
C7	Form and content requirements of management plans.	Section 1.2
Operational Traffic		
B26 – B27	Operate in accordance with the Operational Traffic and Access Management Plan	OTAMP and Section 4.2.6
Air Quality		
B59	Operate in accordance with the Operational AQMP	Section 4.2.1
B60	Operation to not cause or permit emission of any offensive odour	Section 4.2.1
B61	Installation and operation of plant and equipment to comply with limits, air quality criteria and air monitoring requirements	Section 4.2.1
Operational Noise		
B79	Operation is permitted 24 hours 7 days per week.	Section 4.2.8
B83	Operate in accordance with the Operational Noise Management Plan	Section 4.2.8
B84	Noise assessment for mechanical plant required prior to construction – to be considered on any change or upgrade to plant and equipment.	Section 4.2.8
B85	Noise monitoring of mechanical plant and other noisy equipment following occupation of each warehouse. Preparation of a Monitoring Report for Mechanical Plant within two months of occupation to verify predicted mechanical plant and equipment noise levels.	Section 4.2.8
B89	Heavy vehicles not permitted to use Moorebank Avenue south of the East Hills Railway corridor	Section 4.2.8
Dangerous Goods		
B112	Storage and handling of all chemicals, fuels and oils, including Dangerous Goods as defined in the Australian Code for the Transport of Dangerous Goods by Road & Rail.	Section 3.10
B113	Compliance with the *Environment Protection Handbook for Authorised Officers: Bunding and Spill Management — technical bulletin (EPA, 1997)*.	Section 3.11
B114	The quantities of dangerous goods present at any time within each premises or transported from and to the development must be kept below the screening threshold quantities listed in the Department's *Hazardous and Offensive Development Guidelines Application Guidelines Applying SEPP 33* (January 2011)	Section 3.12 Section 3.13 Section 4.2.9 ERP and Section 3.14
B115	Dangerous Goods compliance report required prior to occupation.	

CoC SSD 7628	Requirement	Document Reference
B116	Emergency Response Plan	
FCMM 7E	Should Handling of dangerous goods become necessary including unpacking from containers and storage within works are to be undertaken in accordance with the Storage and Handling of Dangerous Goods Code of Practice (WorkCover NSW 2005) in addition Approval and notification to Qube will be undertaken.	
Waste Management		
B121	Waste to be secured and maintained within designated storage areas	Section 4.2.7
B122	Lawful disposal of wastes	
B123	Assessment and classification of wastes prior to removal from site	
B124	No receipt of wastes generated from off-site	
B125	Retention of waste sampling and classification data	
B126	Collection of wastes between 7 am and 10 pm Monday to Friday	
Pests, Vermin and Noxious Weed Management		
B127	Inspection of site and management of pests, vermin and noxious weeds	Section 4.2.4
Incident Management		
C11 – C12	Notification of incidents	Section 3.7
C13	Preparation of incident reports	Section 3.7
C14	Compliance with directions to address the cause or impact of an incident	Section 3.7
C15	EPA notification to be provided to the Secretary.	Section 3.7
Non-compliance Notification and Reporting		
C16	Non-compliance notification to the DP&E	Section 3.7
C17	Content expectations for non-compliance notification	Section 3.7

Table 5 - Applicable CoC to WH4a operations

3.6 Reporting

The Site Manager will ensure control of all project environmental documentation and reports. Adequate records will be maintained to demonstrate conformance to specified environmental requirements. The records to be maintained include, but not be limited to, the following:

- monitoring records.
- non-conformance, corrective action and preventive action
- complaints management.
- training and induction records.
- audit records.
- permits, licenses, and approvals.

These documents will be maintained within the company intranet.

3.7 Environmental Training

All PCA Express workers who will be working onsite shall receive site-specific induction training. The induction training will include:

- familiarisation with the requirements of this WOEMP.
- familiarisation with Qube's OEMP for MLP Precinct East
- environmental emergency response training; and
- familiarisation with site environmental controls.
- community expectations and complaints management procedure

PCA Express may combine the Work Health and Safety (WHS) and Environmental induction into one. A record of the site induction will be made on the *Site Environmental Induction Register* (see Attachment 2).

3.8 Emergency Contacts and Response

This WOEMP sets out PCA Express management of environmental emergencies during the project. It includes:

- the names of key emergency response personnel and contact details (including all-hours telephone numbers)
- contact details for emergency services (e.g., ambulance, fire brigade, spill clean-up services)
- the location of on-site information on hazardous materials, including SDS (Safety Data Sheets) and spill containment material.
- steps to follow to minimise damage and control the emergency; and
- instructions and contact details for notifying the Site Supervisor, EPA, local council, nearby residents or the community if necessary.

3.9 Key Emergency Response Personnel

The Site Manager will be the first point of contact when an incident or spill occurs. They can be contacted 24 hours a day. Contact details including emergency services are included in the table 6 below:

Table 6 - Emergency Response Contact Details

Project Contact Details	
Emergency Services	
Ambulance, Fire or Police	**000**
Poisons Information	13 11 26
First Aider	
William Gu	0450 113 659
Utilities	
Water	132 203
Electricity	132 090
Gas	131 388
Telephone	131 909
EPA *(24-hour pollution line)*	131 555
Site Manager	
Jessie Zeng	0425 367 054
Officer / Site Supervisor	
N/A	N/A
Health and Safety Representative (HSR)	
N/A	N/A
Other Contacts	
General Manager	0414 583 962

3.10 Dangerous Goods/Hazardous Substances & Compliance

PCA Express store and transport (Container loading) dangerous goods including Flammable liquid 3, Flammable Gas 2 and Oxidizing Agent 5.1 these good are predominantly packaged men's shaving gel, perfumes and air fresheners. PCA stock and cargo stored onsite will be less than the below DG storage thresholds identified in table 8. PCA Express will ensure all goods are identified, quantified, stored and handled as outlined in the sections below.

3.11 Identification of Dangerous Goods

- **Dangerous Goods:** are substances or articles that pose a risk to people, property or the environment, due to their chemical or physical properties. They are usually classified with reference to their immediate risk.

- **Hazardous Substance:** are defined in terms of the chronic or acute harm caused to the health of people exposed to the substance as per the Globally Harmonized System of Classification and Labelling of Chemicals.

The Classes of Dangerous Goods are listed in the table 7 below:

Table 7 – Classes of Dangerous Goods

Class	Description
1	Explosives
2.1	Flammable Gases
2.2	Non-flammable, Nontoxic gases
2.3	Toxic Gases
3	Flammable Liquids
4.1	Flammable Solids
4.2	Spontaneously Combustible
4.3	Dangerous when wet
5.1	Oxidizing Substances
5.2	Organise Peroxides
6.1	Toxic substances
6.2	Infectious Substances
7	Radioactive substances
8	Corrosives
9	Miscellaneous dangerous goods

CoC 7628 B112 states:
The Applicant (the operator/ occupant of each premises) must store and handle all chemicals, fuels and oils, including Dangerous Goods as defined in the *Australian Code for the Transport of Dangerous Goods by Road & Rail*, in accordance with:

(a) the requirements of all relevant Australian Standards; and
(b) the NSW EPA's *Storing and Handling of Liquids: Environmental Protection – Participant's Handbook* if the chemicals are liquids.

CoC 7628 B113 states:
The Applicant (the operator/occupant of each premises) must ensure compliance with the Environment Protection Handbook for Authorised Officers: Bunding and Spill Management — technical bulletin (EPA, 1997 and that for liquids, a minimum bund volume of 110% of the volume of the largest single stored volume within the bund is required.

The inclusion this section is to comply with the condition of consent (CoC 7628) B114 which states:
The quantities of Dangerous Goods present at any time within each premises or transported from and to the development must be kept below the screening threshold quantities listed in the Department's Hazardous and Offensive Development Guidelines Application Guidelines Applying SEPP 33 (January 2011)

3.12 Dangerous Goods Storage Thresholds

PCA Express recognises that where dangerous goods are stored in volumes greater than threshold quantities SafeWork NSW manifest quantity requirements apply. These requirements are listed in Table 8 below:

Table 8 – Dangerous Goods Thresholds

Dangerous Goods	**Packing Group**	**Manifest Threshold Quantities**
Class 2.1	N/A	5000 L
Class 2.2	N/A	10,000 L
Class 2.2/5.1	N/A	10,000 L
Class 2.3	N/A	500L
Aerosols	N/A	10,000 L
Cryogenic Fluids	N/A	10,000 L
Class 3, 4.1, 4.2, 4.3, 5.1, 5.2,	I	500 kg or L
6.1, or 8	II	2,500 kg or L
	III	10,000 kg or L
	Mixed Packing Groups in a single Class, with each below the relevant threshold	10,000 kg or L
Class 9	II	10,000 kg or L
	III	10,000 kg or L
	Mixed Packing Groups in Class 9, with each below the relevant threshold	10,000 kg or L
C1 Combustible Liquids stored with other fire risk dangerous goods	Stored with other fire risk dangerous goods	10,000 kg or L
C1 Combustible Liquids stored separately	N/A	100,000 kg or L
Goods too dangerous to be transported that are not kept in a laboratory.	N/A	Any quantity

3.13 Identification of Quantities of Dangerous Goods

PCA will ensure the following information is collected, reviewed, and recorded by PCA Express in relation to Dangerous goods stored onsite and in transport movements:

- a rolling manifest of dangerous goods intending to be delivered to the warehouse, stored in the warehouse, and being dispatched from the warehouse and their respective quantities.
- dangerous goods classification for each material, including subsidiary class(es).
- the mode of storage used (that is, bulk or packages/containers) and the maximum quantity stored or held on the premises at any one time.
- the distance of the stored material from the site boundary for any of the materials in dangerous goods classes 1.1, 2.1 and 3; and
- an up-to-date register of Safety Data Sheets (SDS) for all materials in storage (see attachment 2)

Furthermore, the following information will be considered by PCA Express.

- LPG, as defined in AS1596 — LP Gas Storage and Handling, though classified as a flammable gas (2.1), is treated separately for screening purposes, and should not be grouped with the other class 2.1 flammable gases.

- If combustible liquids of class C1 are present on site and are stored in a separate bund or within a storage area where there are no flammable materials stored, they are not considered to be potentially hazardous. If, however, they are stored with other flammable liquids, that is, class 3PGI, II or III, then they are to be treated as class 3PGIII, because under these circumstances they may contribute fuel to a fire.

- If liquids are stored onsite Ensure compliance with the Environment Protection Handbook for Authorised Officers: Bunding and Spill Management — technical bulletin (EPA, 1997 and that for liquids, a minimum bund volume of 110% of the volume of the largest single stored volume within the bund is required.

- All industrial equipment that contains quantities of dangerous goods will be included in the quantification of dangerous goods present on the warehouse premises. Any materials of this nature will be part of the overall quantities of dangerous goods being stored on site.

- The weekly review of total dangerous goods quantities held on the warehouse premises will be conducted which provides visibility of held quantities relative to threshold values.
    - When compared to foreseeable receipt and dispatch schedules for dangerous goods into and from the warehouse premises the potential for any exceedance of screening threshold values can be determined and will enable the re-routing or dispatch of any material likely to create such an exceedance.
- Hazardous materials quantities will be grouped and totaled by class (ADG class), activity (goods transfer through warehouse or warehouse plant and equipment) and location (within warehouse racks, bunds, designated storage areas, internally or externally).

- Where several hazardous materials of the same class are kept on site in the same general location, the quantities will be totaled by class and activity (that is, total all quantities of each class stored in bulk then separately total the quantities of each class stored in packages/containers).

- If dangerous goods of a given class but varying packing groups are stored in the same general area, assume the total of that class is present as the most hazardous packing group (for example, if 3PGI and 3PGII are present, add these together and assume the equivalent total is of 3PGI).

- The distance of the material group to the nearest boundary is recorded. The distance is to be measured from those materials in the group located closest to the boundary.

3.14 Emergency Response Procedures:

Fire Emergency

Steps to manage a fire emergency:

- Call **'000'** as soon as possible.
- If safe to do so leave the work area. If unsafe to leave, seek refuge in a safe area immediately.
- Go to the designated Emergency Assembly Area or to a clear/open area.
  - Make sure all workers are present and accounted for, do not return to the work area to locate any missing workers; and
- Notify the Site Supervisor and wait for instructions.

Gas Leak Emergency

Steps to manage a gas leakage emergency:

- Call the Site Supervisor immediately, if deemed necessary call the Fire Brigade on **'000'**
- Site Supervisor to immediately arrange to turn off the gas supply.
- Site Supervisor to turn off the site's electrical supply.
  - If deemed necessary, notify all persons to evacuate the work area and assemble at the Emergency Assembly Area.
- Control the movement of people to the Emergency Assembly Area.
- Check all workers and others are in attendance; and
- Remain at the Emergency Assembly Area until notified that the area is safe to reoccupy.

Leak or Spill Emergency

Steps to manage any Leak or Spill in a work site:

- Identify the source of the problem.
- Stop goods leaking.
- Contain spilt material, using spills kit or sand.
- Notify officer or Site Supervisor.
- Remove spilt material and place in sealed container for disposal (if possible); and
- Site Supervisor to record incident.
- as suggested on Safety Data Sheet (SDS)

Emergency Testing

Appropriate testing, alarm systems and work, health and safety (WHS) precautions would be implemented for the safety of personnel and infrastructure.

NOTE: In conjunction with the above please refer to the MPE 2 ERP

4 IMPLEMENTATION

4.1 Environmental Risks

The risk to the environment has been considered when devising this management plan. The outcomes of this process have provided our business with mitigation strategies to control the risks identified.

An Environmental Risk assessment has been undertaken by PCA Express to determine the environmental aspects and impacts and to identify the environmental risk profile of Warehouse operations. Environmental Risks (Aspects/Impacts) were also drawn from the QUBE environmental documentation. These risks, aspects and impacts were summarised into operational control areas, to allow the development of suitable environmental mitigation measures and objectives for the contract.

PCA Express has established a Risk Register to identify the environmental risks, aspects and impacts associated with operations. This involved the consideration of normal and abnormal operating conditions, start-up, and shut-down conditions, as well as foreseeable emergency situations. The following risk matrix shall be applied in the preparation of the Hazards Register:

Likelihood (L) of Occurrence		
1	**Rare**	An incident is unlikely to occur
2	**Unlikely**	An incident is unlikely to occur in the next 5 years
3	**Moderate**	An incident could be expected to occur in the next year
4	**Likely**	An incident could be expected in the next 6 months
5	**Almost Certain**	An incident is expected to occur during the next month
Consequence (C) of Result		
1	**Insignificant**	No injury, or Minor first aid, or no environmental impact
2	**Minor**	First aid injury, or negligible environmental impact
3	**Moderate**	Medical treatment required, or environmental impact contained
4	**Major**	Lost time injury, or Some detrimental impact on environment
5	**Catastrophic**	Death or permanent disability, or Major impact on environment

Likelihood		**Consequence**				
		1	**2**	**3**	**4**	**5**
	5	**H**	**H**	**E**	**E**	**E**
	4	**M**	**H**	**H**	**E**	**E**
	3	**L**	**M**	**H**	**E**	**E**
	2	**L**	**L**	**M**	**H**	**E**
	1	**L**	**L**	**M**	**H**	**H**

E = Extreme	**H = High**
M = Moderate	**L = Low**

To be effective the Risk Register has been developed in consultation with staff from all relevant operational areas.

- The ranking (or determination of significance) for each risk is based on the following:
- The Hazard (that which may cause harm), which may be controlled by elimination or substitution
- The Pathway (how harm may occur), which may be controlled by engineering or administrative controls
- The Impact (the nature of the harm that may occur), which may be controlled by measures such as spill control equipment and emergency response procedures.

This analysis directs the correct application of the hierarchy of controls.

Assessed risks were assigned a risk control priority in accordance with the table below.

Table 9 – Risk Assessment

Hazard Risk Rating	Priority for Control
Extreme	Immediate application of controls or cease operation until it can be appropriately controlled.
High	To be appropriately mitigated within the time of the shift, work or task time and a permanent control within 3 months.
Medium	Within 6 months.
Low	When an appropriate alternative can be sourced.

Aspect	Impact	Risk
Air quality	Dust and emissions from Operations	Low
Stormwater, Erosion and Drainage Management	Potential Impact: Site erosion and sediment laden water or contaminated stormwater leaving the site	Low
Noise and light pollution controls	Potential disturbance to neighbours	Medium
Litter and Waste Management surrounding Warehouse	Potential waste and litter around MLP	Medium
Surface and Ground water quality	Potential waterway contamination	Low
Hazardous Substances and Dangerous Goods	Potential contamination of air, land and water if loss of containment occurs.	Medium
Energy, Water and Resource Consumption	Overconsumption of Energy, Water or Resources.	Low
Traffic	Traffic disturbance or incidents	Low
Flora and fauna	Disturbance to flora and fauna. Native vegetation	Low
Incident (Spill)	Pollutants to air, land and water	Medium

4.2 Environmental Management Activities and Control Measures

The following environmental management activities, mitigation and control measures will be adopted to prevent or minimise environmental impacts.

4.2.1 Air Quality

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Emissions of air pollutants from motor vehicles & plant		
Regular maintenance of machinery and equipment (forklifts etc). Workers instructed not to leave machinery idling when not in use.	Site Supervisor	Ongoing
Potential Impact: Dust generated from movement of plant		
If significant dust is generated, from site operations or work areas the work area/stock and or equipment will be watered down or cleaned	Site Supervisor	Ongoing

4.2.2 Erosion & Sediment Control

Control Measure	Responsibility	Timing / Frequency

Potential Impact: Site erosion and sediment laden water leaving the site		
N/A	N/A	N/A

4.2.3 Water Quality

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Contamination of water due to chemicals, fuels or wastes		
Safety Data Sheet (SDS) of hazardous substance will be referred to should a spill occur.	Site Supervisor	Ongoing
The site will hold a spill kit to contain any site spills.	Site Supervisor	Ongoing
Any hazardous substances on site will be recorded in the Hazardous Substances and Safety Data Sheet Registers.	Site Supervisor	Ongoing

4.2.4 Flora & Fauna

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Spread of weeds		
If Weeds are identified notification to Qube will be undertaken and a contractor will be engaged to remove from the site to prevent spread.	Site Supervisor	Ongoing
Onsite lawns and garden areas will be maintained regularly, and refuse disposed of composted by a Qube contractor.	Site Supervisor	Ongoing

4.2.5 Community Relations

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Public amenity		
Any Noise or community complaints received by PCA Express will be passed on to Qube.	Site Manager	If Required

4.2.6 Traffic

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Parking and access to site		
A Traffic Management Plan for the site has been developed to manage all vehicle movements onsite	Site Manager	Ongoing
The Traffic Management Plan will be upheld onsite.	Site Supervisor	Ongoing

4.2.7 Waste Management

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Unacceptable disposal of site waste		
All material waste disposed of will be recorded in the Waste Records by the nominated waste contractor.	Site Supervisor	Ongoing
All waste removed from site will be disposed of in accordance with the Protection of the Environment Operations Act 1997	Site Supervisor	Ongoing

Appropriate space will be provided for the temporary storage of garbage, recyclable, and compostable waste to ensure separation of waste products.	Site Supervisor	Ongoing
On-going checks will be carried out to ensure correct separation and re-use of recyclable materials is being maintained.	Site Supervisor	Ongoing

4.2.8 Noise

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Unacceptable noise levels and vibrations		
Work equipment will be maintained in good working order to comply with EPA guidelines. Where required, noise suppressors will be installed.	Site Supervisor	When Required
Work will take place during nominated business hours only.	Site Manager	Ongoing

4.2.9 Dangerous Goods and Hazardous

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Spills and uses of Dangerous goods and hazardous substances leading to potential contamination of air, land and water if loss of containment occurs.		
All Dangerous goods/ Haz. substances are to be identified, quantified, stored, handled and disposed of in accordance with this WOEMP, Qube and EPA requirements.	Site Supervisor	Ongoing
All hazardous waste removed from site will be disposed of in accordance with the Protection of the Environment Operations Act 1997 (POEO ACT 1997).	Site Manager	When Required
Ensure compliance with the Environment Protection Handbook for Authorised Officers: Bunding and Spill Management — technical bulletin (EPA, 1997 and that if liquids are to be stored onsite, a minimum bund volume of 110% of the volume of the largest single stored volume within the bund is required.	Site Supervisor	When Required
Safety Data Sheet (SDS) of hazardous substance will be referred to if spills occur.	Site Supervisor	When Required
All hazardous substances will be recorded in the Hazardous Substances Register and the SDS recorded in the Safety Data Sheets (SDS) Register.	Site Supervisor	Ongoing
Dangerous goods storage within WH 4A, will be quantified and a screening test would be undertaken in accordance with SEPP 33.	Site Supervisor	Ongoing
Handling of dangerous goods including unpacking from containers and storage within the warehouse this shall be undertaken in accordance with the Storage and Handling of Dangerous Goods Code of Practice (WorkCover NSW 2005).	Site Supervisor	Ongoing
Should it be required an Operational Hazard and Risk Management Plan would be developed for the Amended operations and area and be implemented as part of the OEMP for the Amended Proposal. This plan would be reviewed regularly and updated should goods entering the site change. As a minimum, the plan would adopt the requirements of the Code of Practice for Storage and Handling of Dangerous Goods (WorkCover NSW 2005).	Site Supervisor	If Required

5 MONITOR AND REVIEW

5.1 Environmental Monitoring

PCA Express will monitor the environmental controls listed in Section 4.2 through regular site environmental inspections.

Site environmental inspections will be undertaken on at regular intervals or as required to monitor the requirements of this plan. Inspections will be recorded by the Site Supervisor on the Site Inspection Checklist (see Attachment 2).

5.2 Environmental Auditing

Planned and documented audits aimed at evaluating the environmental conformance our Moorebank site will be carried out by PCA Express. Any deficiencies identified during the audits shall be documented and actioned in accordance with the PCA Express's corrective action process. Furthermore, the audit program will determine whether or not the WOEMP has been properly implemented and maintained onsite. The audits to be carried out and their frequency are listed in table below:

Audit Type	Frequency	Record	Auditor
Environmental Management Plan	6 Monthly	Audit Report	Site Manager
Site Environmental Inspection	Monthly	Site Environmental Inspection Checklist	Site Supervisor

5.3 Communication

To minimise impacts on the public by our site, residents and adjacent property owners will be notified in advance writing before any new or additional works commence and at appropriate stages during any project undertaken in the future by PCA Express. The letter will contain:

- details of the intended work,
- the duration of the activities,
- information regarding any access interruptions and details of whom to contact with questions regarding the work.
- The Project Manager will seek permission if there is any need to access private property.

PCA Express will undertake external and on-site communication in case of environmental incidents and emergencies, including communication with subcontractors. External communication will include informing nearby residents of proposed work, incidents and emergencies and contacting regulatory agencies if required.

5.4 Environmental Incidents

Should an environmental incident occur, the site manager or delegate will notify QUBE, and the incident will be recorded and responded to. The Site Manager will follow up on any corrective actions and reporting as required.

5.5 Complaints

Community groups, clients, interested parties, etc. may advise of practices, activities and processes that are related to the environment by a variety of methods. These may include:

- a non-conformance report, fax/letter, telephone complaint, newspaper/magazine report and verbal protest.

On receipt of a complaint, the person receiving the complaint will notify QUBE and the complaint will be recorded using the *Environmental Complaint Form* (see Attachment 2). The Site Manager will follow up the complaint and take corrective action as require

5.6 Non-Conformance & Corrective Action

A non-conformance occurs when a procedure or environmental control is not followed or does not perform as required by this WOEMP. PCA Express will monitor non-conformances to the WOEMP and initiate corrective and preventive action/s where required. All non-conformances will be recorded on a *Non-Conformance Report Form* (see Attachment 2).

PCA Express will undertake corrective action/s in when incidents that have had an environmental impact. Procedures for identifying corrective action include:

- An WOEMP review
- An investigation into the causes of incidents and recording of the results; and
- Evaluating further environmental risks.
- In accordance with the requirements of CoC C11 – C17, non-conformances that are also considered to be an incident or warrant notification would be provided to Qube Estate Management.

5.7 Environmental Management Plan Review

This WOEMP will be reviewed by the Site Manager as required to ensure its continuing suitability and to ensure it is conforming to the WOEMP's environmental objectives and legal requirements.

Reviews will be undertaken annually) or because of any of the following:

- when there is a change in the operations onsite which requires a change to environmental controls
- when there is a need to improve performance in an area of environmental impact
- at the completion of environmental audits as required; &
- because of changes in environmental legislation (applicable to our business activities)

Changes to the Environmental Plan

- Reasons for making changes to the WOEMP will be documented.
- A copy of the original WOEMP document will be kept within company records.
- The Chief Executive and Site Manager are authorised to change and re-issue the WOEMP
- The Site Supervisor is to be informed of any changes made
- The Site Supervisor is responsible for ensuring the staff are complying with the current WOEMP, and for informing staff of any changes.

5.8 Environmental Management Plan Review Scope

The annual review scope may include *(but is not limited to)* the following:

- Compliance with legislation
- Are procedures are being followed (site inspection)
- Mitigative measures specified in this WOEMP are being implemented and remain adequate and appropriate.
- Training and induction records are in order.
- Environmental reports are being completed and any actions implemented and closed out.
- Environmental incidents are being recorded, actioned, and closed out.
- Environmental objectives are being achieved.

5.9 Environmental Management Compliance Report

PCA Express will prepare an *'Environmental Management Compliance Report'* which will detail how we have complied with the

- Conditions of Consent (CoC); &
- The Environmental Management Plan

The report will be supplied to Qube Estate Management on a six-monthly basis and form part of the overarching compliance report that Qube will submit to the DP&E in accordance with COC C21.

5.10 Environmental Management Records

Appropriate records that demonstrate the environmental obligations will be maintained. This includes, but is not limited to the following:

- Complaints register
- Incident reports and register
- SDS Register
- Licenses and permits register (if applicable)
- Waste tracking register / waste transfer receipts (if applicable)
- Training records
- Monitoring data

Note: The records must be legible and readily interpretable by a third party.

5.11 Review and Improvement

This WOEMP will be reviewed formally on an annual basis by the Warehouse Manager in consultation with the Qube Estate Management, and other stakeholders as required.

Review may also take place immediately after any significant incident or change to the activities, products or services or material changes in the operating conditions.

This WOEMP is a 'live' document with the ability to change as the operational situation changes. These changes can be in the form of recommendations from PCA Express Management, external auditor, Qube / EMC or site employees.

This WOEMP will be reviewed formally on an annual basis in consultation with stakeholders as required. Review may also take place immediately after any significant incident or change to the activities, products or services or material changes in the operating conditions.

ATTACHMENTS: ENVIRONMENTAL DOCUMENTATION

1. Site Environmental Induction Register
2. Site Environmental Inspection Checklist
3. Environmental Complaint Form
4. Non-Conformance Report Form
5. Hazardous Substances Register
6. Safety Data Sheets (SDS) Register
7. Waste Register

1. SITE ENVIRONMENTAL INDUCTION REGISTER

Record of persons receiving environmental induction for this site

Warehouse 4A:

Address: _____

Name of Inductor: _____ **Telephone:** _____

Topics Covered: _____

_____

_____

I have attended this induction and have read and understood the environmental rules of this site and WOEMP.

Date	Worker Name	Induction Number (e.g. general induction card, license)	Worker Signature	Supervisor

Trainer Sign off

Signed: _____ **Date:** _____

2. SITE ENVIRONMENTAL INSPECTION CHECKLIST

PROJECT DETAILS

Site: _____

Contact Name: _____ **Telephone:** _____

Email _____ **Date:** _____

ENVIRONMENTAL ISSUES

Erosion and Sediment Control	**Yes**	**No**	**N/A**	**Comments**
Have materials been contained or placed in designated areas to be away from stormwater drains/runoff?				
Are designated washout areas in place away from storm water drains?				
Is relevant protection in place surrounding flora to stop any damage?				
Is the site maintained and cleared away daily of all soil, earth, mud, clay that may cause an environmental issue?				
Waste Management	**Yes**	**No**	**N/A**	**Comments**
Has a Waste Management Plan been created and implemented?				
Have stockpiles or designated waste areas been created?				
Is the waste being stored in such an area as not to pollute or contaminate stormwater drains?				
Have excess materials been recycled, reused or returned?				
Hazardous Materials	**Yes**	**No**	**N/A**	**Comments**
Are spill kits available and held on site?				
Are spills attended to and cleaned up immediately?				
Is there a designated storage area for hazardous? materials where leaks can't flow to open ground or drains?				
Are all hazardous material containers sealed properly and no leaks evident?				
Are Safety Data Sheet (SDS) on site for all hazardous materials?				
Air Quality	**Yes**	**No**	**N/A**	**Comments**
Does all plant and equipment comply with the relevant codes and emission standards for air quality?				
Noise Management	**Yes**	**No**	**N/A**	**Comments**
Are procedures in place to minimise noise to workers, site and surrounding areas.				
Does all plant and equipment comply with the relevant codes, guidelines and standards for noise control?				

Company Representative Name: _ Signature:

_____

Date: _____

3. ENVIRONMENTAL COMPLAINT FORM

Project Name: _____ **EC Number:** _____

Address: _____ **Date:** _____

EC issued to: _____ **EC issued by:** _____

ENVIRONMENTAL COMPLAINT DETAILS

Environmental Incident			
□ Pollution		□ Potential pollution	
□ Other:			
DETAILS OF COMPLAINT			
Name:		**Address:**	
Position:		**Contact No**	
NATURE OF COMPLAINT			
□ Dust		□ Vibration	
□ Noise		□ Soil contamination	
□ Water		□ Plant/machinery	
□ Pollution		□ Waste	
□ Flora/fauna		□ Erosion and sediment controls	
		□ Other:	
INCIDENT DETAILS			
Location of incident:		**Time:**	
		Date:	
Description:			
Conditions of site when complaint occurred:			

Corrective or preventive action to be taken to fix the complaint	**Responsible person**	**Date to be completed by**

SIGN OFF			
Corrective or preventive action is complete and dealt with by the responsible person noted above			
Name:		**Date:**	
Signature:			
Site Manager agrees corrective or preventative is complete			
Name:		**Date:**	
Signature:			

4. NON-CONFORMANCE REPORT FORM

Project Name: _____ **NCR Number:** _

Address _____ **Date:** _____

NCR issued to: _____ **NCR issued by:** _

NON-CONFORMANCE DETAILS

Area of Non-Conformance	
☐ Site Establishment	☐ Work Health and Safety
☐ Works outlined in contract	☐ Environmental Management
☐ Supplier	☐ Quality Management
☐ Customer complaint	☐ Other:

Description of Non-Conformance
Outline the evidence obtained for Non-Conformance

Corrective or preventive action to be taken to fix the Non-Conformance	**Responsible person**	**Date to be completed by**

Sign Off			
Corrective or preventive action is complete and dealt with by the responsible person noted above			
Name:		**Date:**	
Signature:			
PCA agrees corrective or preventative is complete			
Name:		**Date:**	
Signature:			

5. HAZARDOUS SUBSTANCES REGISTER

Product Name	Location where Product is Used	Quantity	Clearly Labeled	SDS on Site		Action / Comments
			Yes / No	Yes / No	Date	

An SDS is a Safety Data Sheet – these are available from the substance manufacturer or the point of purchase. SDS must be on site together with the hazardous substance. Action / Comments - note any particular safety controls required e.g. use, transport, PPE, first aid, storage, spill control and whether each substance is classified as hazardous (according to NOHSC) or dangerous goods for transportation (according to ADG code).

6. SAFETY DATA SHEET (SDS) REGISTER

SAFETY DATA SHEET REGISTER					
SDS Number	**Date of Issue**	**Worker**	**Description**	**Date Reviewed***	**Signed**

*Check SDS is current before starting each project.
SDS must not be more than five years old from date of issued date.
Refer to: ***Safe Work Australia Code of Practice - Preparation of Safety Data Sheets for Hazardous Chemica***

7. WASTE REGISTER

PCA EXPRESS – WAREHOUSE 4 A										
Address:										
Waste Material Type e.g. soil, rock, vegetation etc.	**TOTAL amount** (m^3 and/or tonnes)	**Date**	**On-site Re-use** (Specify amount re-use onsite and intended use)		**Off-site Re-use** (Specify contractor and recycler)		**Off-site Disposal**			
			amount (m3/tonnes)	use/location	amount (m3/tonnes)	name of recycler	amount (m3/tonnes)	name of contractor	pick up time/date	