

Mitigation Measures

The EIS provided a consolidated list of mitigation and management measures to satisfy Clause 192(1)(d)(iv) of the *Environmental Planning and Assessment Regulations 2021* (EP&A Regulations). This list was subsequently amended in the Response to Submissions and added to by the subsequent RtS – Additional RFI. These mitigation measures have been updated to be consistent with the further commitments provided within this response.

Both minor editorial and administrative changes and updates have been undertaken for these mitigation measures. An overview of the key changes include the following:

- General –
 - 0A has been updated to recognise the submission of the updated Air Quality Management Plan and Noise Management Plans, and guide post approval updates to the existing management plans.
 - 0C has been included to identify that an Environmental Work Method Statement would be submitted for the minor works associated with the acoustic fence. In this instance, based upon the minor nature of the works, limited potential for environmental impacts and short duration a Construction Environmental Management Plan is not considered necessary or suitable.
- Traffic and Transport –
 - 1H has been removed as an Employee Transport Plan has been included within this response and therefore would not be required post approval.
 - 1I has been included to ensure that transport routes for operational and emergency vehicles are maintained during, and at the end of, operations.
- Air Quality –
 - 2A text has been removed as the Air Quality Management Plan has been updated and submitted as part of this response. 0A already prompts any update required to this management plan (to be consistent with the conditions of consent) and therefore the inclusion of another mitigation measure (repetition) is considered unnecessary and has been removed for simplicity and clarity. This mitigation measure has been updated to identify the inclusion of a Trigger Action Response Plan as identified within the Air Quality Management Plan.
 - 2M previous mitigation measure relating to monitoring has been deleted as it has been updated by the Trigger Action Response Plan monitoring to be undertaken (refer to above).
 - 2O the word odour has been removed as Sell & Parker have not recently included this within their testing as odour is not a regular potential operational impact from the site operations. There have been no odour complaints received from Sell & Parker since 13 August 2018, which was investigated and reported to the EPA and believed to be unrelated to the site operations.
 - 2J has been updated to reflect a practical air quality approach. Sell & Parker would request that trucks outside of their fleet be covered (when containing potential materials which could result in air emissions) however they do not have this level of control over all vehicles. This wording was previously an omission.
- Noise and Vibration –
 - 3G text has been removed as the Noise Management Plan has been updated and submitted as part of this response. 0A already prompts any update required to this management plan (to be consistent with the conditions of consent) and therefore the inclusion of another mitigation measure (repetition) is considered unnecessary and has been removed for simplicity and clarity. This mitigation measure has been updated to identify the inclusion of a Live Noise Monitoring Feedback Tool as identified within the Noise Management Plan.
 - 3H has been updated to reflect the proposed acoustic fence design.
- Waste Management –
 - 7A wording has been updated to better reflect the waste management practices undertaken on the Proposal site.
 - 7C wording has been updated to reflect current practices which are considered a best practice. It is impractical, nor would it improve the environmental outcome for these types of reporting to be taken every

month. The second bullet point has been removed as this relates to external parties which is outside of the bounds of Sell & Parker's control. Sell & Parker would, on commencement of a relationship, ensure a facility operator has a relevant licence however it would be the responsibility of the facility operator to maintain these.

Updates, based upon this response (other than minor editorial or administrative – which have not been shown), have been shown in blue underlined text within the table below. Any deletions have been shown in blue struck through text.

These mitigation measures will be implemented to minimise the impact of the Proposal on the surrounding environment.

Revised Consolidated List of Mitigation Measures

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
0. General	0A	<ul style="list-style-type: none"> The following OEMP documentation would be updated (as relevant) to reflect the conditions of consent to ensure consistency with the Proposal activities and the mitigation measures identified within for this EIS response: <ul style="list-style-type: none"> Operational Environmental management Plan Air Quality Management Plan Emergency Response Plan Landscape Management Plan Noise Management Plan Waste Monitoring Management Plan Water Management Plan. <p>The Air Quality Management Plan and Noise Management Plan submitted with this response would be utilised as the basis for the updates to these plans.</p>	Prior to Operation
	0B	<ul style="list-style-type: none"> The Proposal Site and operations will be subject to an independent environmental audit every 3 years unless the Secretary directs otherwise. 	Operation
	0C	<ul style="list-style-type: none"> An Environmental Work Method Statement (EWMS) (or equivalent) would be prepared for the erection of the acoustic fence. 	Prior to Operation
1. Traffic and Transport	1A	<ul style="list-style-type: none"> Proposal Site access, driveways and parking will be maintained in accordance with the latest versions of Australian Standard AS 2890.1 and AS 2890.2. 	Operation
	1B	<ul style="list-style-type: none"> The Proposal Site will be maintained to ensure the swept path of the longest vehicle accessing the subject site, as well as manoeuvrability through the site, is in accordance with AUSTROADS Guide to Road Design. 	Operation
	1C	<ul style="list-style-type: none"> On-site stacking would be managed to ensure operation of the Proposal Site does not result in any vehicles parking or queuing on the public road network. 	Operation
	1D	<ul style="list-style-type: none"> All vehicles will be wholly contained on site before being required to stop. 	Operation
	1E	<ul style="list-style-type: none"> All loading and unloading of heavy vehicles will be carried out on-site. 	Operation
	1F	<ul style="list-style-type: none"> Proposed turning areas in the car park will be kept clear of any obstacles, including parked cars, at all times. 	Operation
	1G	<ul style="list-style-type: none"> All vehicles will enter and leave the site in a forward direction. 	Operation
	1H	<ul style="list-style-type: none"> Sell & Parker will prepare an Employee Transport Plan in consultation with Transport for NSW. 	Prior to Operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
	1I	<ul style="list-style-type: none"> Access and egress routes/swept paths and truck stacking areas identified on the Swept Path Plans (dated 17 November 2022 prepared by TPPP) would be maintained clear of any materials, plant or equipment at all times during operations and at the end of daily operations. 	Operation
2. Air Quality and Odour	2A	<ul style="list-style-type: none"> All activities on-site would be undertaken in accordance with the Air Quality Management Plan. The final Air Quality Management Plan will include the following:- <ul style="list-style-type: none"> A description of the measures to be employed to minimise air emissions. A description of contingency measures to deployed to minimise impacts should adverse air emissions occur or appear likely to occur Identification of triggers for the deployment of operational air quality measures Identification of triggers for ceasing or partially ceasing operations on-site during adverse air quality conditions A description of the system used to evaluate the performance of the Proposal Site Details of the location, frequency and duration of monitoring activities A protocol to determine the occurrence of any exceedance of the criteria in the EPL should an exceedance occur A complaints management procedure including steps to investigate complaints and rectify issues where required. A Trigger Action Response Plan (TARP) would be implemented on site, as described within the Air Quality Management Plan. This TARP would provide processes for identifying conditions that may lead to unacceptable dust impacts and outline pro-active and reactive actions to avoid these impacts. 	Prior to Operation
	2B	<ul style="list-style-type: none"> The air quality emissions control system will be maintained in good working order. 	Operation
	2C	<ul style="list-style-type: none"> A continual weather monitoring station will be maintained on-site. 	Operation
	2D	<ul style="list-style-type: none"> An air quality monitoring system will be maintained on-site to evaluate the performance of the Proposal. 	Operation
	2E	<ul style="list-style-type: none"> All plant is to be inspected daily and ensure it is fit for use. 	Operation
	2F	<ul style="list-style-type: none"> Works that have the potential to generate fugitive dust emissions must be planned to take into account weather conditions. 	Operation
	2G	<ul style="list-style-type: none"> Works areas, and where applicable material stockpiles, will be wetted down as required. 	Operation
	2H	<ul style="list-style-type: none"> Work areas will be maintained to allow street sweeper access. 	Operation
	2I	<ul style="list-style-type: none"> Sealed surfaces on-site will be maintained regularly using street sweepers to prevent dust re-entrainment from vehicle movements and other equipment use. 	Operation
	2J	<ul style="list-style-type: none"> All Sell & Parker trucks are to have any loads presenting a risk of dust covered or capped when entering and leaving the Proposal site. 	Operation
	2K	<ul style="list-style-type: none"> Ferrous vehicles will exit the Proposal Site via the wheel wash. 	Operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
	2L	<ul style="list-style-type: none"> Dust screens and fences will be inspected monthly with any identified failures, gaps or holes placed onto a maintenance report for rectification. Rectifications will be done using appropriate materials that do not diminish their dust collection qualities. 	Operation
	2M	When monitoring indicates that there is a potential for the 4 hour rolling average to breach air quality criteria, corrective actions will be instigated.	Operation
	2M	<ul style="list-style-type: none"> Only one oxy-acetylene torch will be operating at a time. 	Operation
	2N	<ul style="list-style-type: none"> Cutting of any metal beam that is up to 100 millimetres thick will be undertaken with the shear where feasible. 	Operation
	2O	<ul style="list-style-type: none"> The next scheduled NATA accredited emission testing event on the Hammermill ECS under EPL 11555 will be extended in scope to include measurement of NOX, H2S, HF and HCl, Cl2 and odour, in addition to the requirement for the measurement of particulates, particulate and vapour phase metals. 	Operation
	2P	<ul style="list-style-type: none"> The Proponent will continue to review its oxycutting operations and emissions from the Oxycutter 	Operation
	2Q	<ul style="list-style-type: none"> Where safety allows, conveyor transfer points are to be enclosed 	Operation
	2R	<ul style="list-style-type: none"> Targeted water sprays are to be used on all appropriate handling and transfer points, ensuring that run off is appropriately captured, filtered and discharged or recycled 	Operation
	2S	<ul style="list-style-type: none"> Drop heights on all handling and transfer points are to be minimised. 	Operation
	2T	<ul style="list-style-type: none"> The Air Quality Management System Configuration, location, metrics and trigger points will be periodically reviewed. 	Operation
3. Noise and Vibration	3A	<ul style="list-style-type: none"> Acoustic fences will be inspected monthly with any identified failures, gaps or holes placed onto a maintenance report for rectification. Rectifications shall be done using appropriate materials that do not diminish their acoustic qualities 	Operation
	3B	<ul style="list-style-type: none"> If there are activities to be undertaken that could potentially cause excessive noise or vibration issues, mitigation measures are to be assessed prior to the activity taking place. 	Operation
	3C	<ul style="list-style-type: none"> All plant and equipment installed and used on-site will be maintained and operated in a proper and efficient condition. 	Operation
	3D	<ul style="list-style-type: none"> If weather conditions are likely to result in an increase of noise transmission, activities will be assessed and where required rescheduled, reduced or stopped. Monitoring shall be done in conjunction with data supplied from the on-site meteorological station. 	Operation
	3E	<ul style="list-style-type: none"> An airblast overpressure measuring device will be maintained on the Proposal Site boundary. 	Operation
	3F	<ul style="list-style-type: none"> To manage the potential for impacts from explosions the following measures would be implemented: <ul style="list-style-type: none"> The use of the pre-shredder to process vehicles Labelling of bins that we do not accept gas bottles Signed agreement of the material acceptance form outlining items we don't accept Inspection of loads 	Operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
		<ul style="list-style-type: none"> – Immediate return of unacceptable items to the truck (where possible) – Deduction of tonnage from the load as a disincentive penalty. 	
	3G	<ul style="list-style-type: none"> • Noise and vibration generating activities on-site would be undertaken in accordance with the Proposal Site Noise and Vibration Management Plan. The Noise and Vibration Management Plan will include the following: <ul style="list-style-type: none"> – Identification of noise and vibration criteria as established within this EIS to which the Proposal Site must comply – A procedure for investigation of noise complaints including a methodology for rectifying issues as required – A methodology for minimising noise impacts during adverse weather conditions – A procedure for regular assessment of noise monitoring data including measures to relocate, modify and/or stop operations as required to ensure compliance with the noise criteria. – A procedure for recording and checking data collected by the airblast overpressure monitor <p><u>A Live Noise Monitoring Feedback Tool would be implemented on site, as described within the Noise Management Plan. This tool would provide processes for identifying conditions that may lead to unacceptable noise impacts and outline pro-active and reactive actions to avoid these impacts.</u></p>	Prior to Operation
	3H	<p>The acoustic fence on the eastern boundary of the Proposal Site will increased in height by 2.2 metres. Details of this barrier will be updated in the OEMP <u>be constructed in accordance with the Site Plan and Acoustic Fence Layout included within this response.</u></p>	Prior to Operation
4. Soil, Water and Contamination	4A	<ul style="list-style-type: none"> • All activities on the Proposal Site would be undertaken in accordance with the Site Water Management Plan. The Water Management Plan includes the following: <ul style="list-style-type: none"> – A description of the operation and maintenance of the existing water management system – A procedure for testing the performance of all components of the Water Management System, including the primary, secondary, and tertiary treatment systems – A description of the system used to manage water quality including sampling and comparison against the baseline data. – Procedures for site inspection and proactive management of potential issues – A procedure of sampling of the sediment basin and identification of corrective actions (where applicable). 	Operation
	4B	<ul style="list-style-type: none"> • Regular cleaning of the filtration system will be carried out to maintain performance. 	Operation
	4C	<ul style="list-style-type: none"> • The existing network of underground stormwater pipes, inlets and filtration system will be cleaned and repaired / replaced as required. 	Operation
	4D	<ul style="list-style-type: none"> • Chemicals will be stored within impervious bund of more than 110% of the largest container within the bund. 	Operation
	4E	<ul style="list-style-type: none"> • Safety Data Sheet (SDS) will be maintained for all chemicals stored on-site and made available to Proposal Site personnel. 	Operation
	4F	<ul style="list-style-type: none"> • Refuelling will occur away from drainage points, and spill kits will be available. 	Operation
	4G	<ul style="list-style-type: none"> • Waste receptacles will be provided for the storage and disposal of all wastes generated on-site. 	Operation

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	4H	<ul style="list-style-type: none"> Collected runoff in the stormwater retention basin will continue to be used for operation as long as the water is of a quality such that impacts to Proposal Site infrastructure, the surrounding environment and the health and safety of employees is avoided. 	Operation
	4I	<ul style="list-style-type: none"> All pollution incidents that threaten or harm the environment shall be reported immediately to relevant authorities in accordance with the <i>Protection of the Environment Operations Act 1997</i> (POEO Act). 	Operation
	4J	<ul style="list-style-type: none"> A Hazardous Materials Register and respective Safety Data Sheets (SDSs) shall be kept on-site at all times and be regularly maintained. 	Operation
5. Flooding	5A	<ul style="list-style-type: none"> Flood response on the Proposal Site will be undertaken in accordance with the Early Warning Flood Readiness Plan (as part of the Emergency Response Plan). The Proponent will consult with the State Emergency Service for the preparation of this Plan. 	Prior to Operation
6. Hazards and Risk	6A	<ul style="list-style-type: none"> All chemicals, fuels and oils used on-site will be stored in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007</i>. 	Operation
	6B	<ul style="list-style-type: none"> All incidents and near misses will be documented, recorded and investigated. 	Operation
	6C	<ul style="list-style-type: none"> Results of the Proposal Site inspections will be recorded and kept on file. 	Operation
	6D	<ul style="list-style-type: none"> The floc piles will be maintained to less than 4m in height. 	Operation
	6E	<ul style="list-style-type: none"> Management of environmental emergencies will be undertaken in accordance with the Pollution Incident Response Management Plan. 	Operation
	6F	<ul style="list-style-type: none"> The Proposal Site will be maintained to ensure run-off on operational areas is captured by the Water Management System. 	Operation
	6G	<ul style="list-style-type: none"> Spill kits will be available on-site and be deployed to manage and contain minor spills. 	Operation
	6H	<ul style="list-style-type: none"> All pollution incidents that threaten or harm the environment will be reported immediately to relevant authorities in accordance with the POEO Act. 	Operation
	6I	<ul style="list-style-type: none"> Fire and incidents on the Proposal Site will be managed in accordance the Emergency Response Plan. 	Operation
	6J	<ul style="list-style-type: none"> The Operational Environmental Management Plan will be updated to include the safety requirements for unloading liquid oxygen to the on-site bulk storage tank. 	Prior to Operation
	6K	<ul style="list-style-type: none"> A review and audit of the bulk liquid oxygen storage tank installation will be undertaken prior to operation to ensure compliance with the requirements of the relevant Australian Standard/s. 	Prior to Operation
	6L	<ul style="list-style-type: none"> The enclosure surrounding the liquid storage tank will be assessed by a suitably qualified structural engineer (in consultation with Coregas) to ensure it is structurally secure in the event that there is a release of low temperature liquid oxygen. 	Prior to Operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
	6M	<ul style="list-style-type: none"> The Emergency Response Plan will be updated to include a specific emergency response procedure to cover a release of liquid oxygen at the Proposal Site. 	Prior to Operation
	6N	<ul style="list-style-type: none"> Fire infrastructure non-compliances, as identified in the Fire Hydrant Assessment Report (Sparks and Partners, 2020) will be rectified prior to operation of the Proposal. Details of works to address non-compliances will be included within a Fire Hydrant Close Out Report. 	Prior to Operation
7. Waste Management	7A	<ul style="list-style-type: none"> All waste materials which meet the specification definition of waste under the POEO Act to be reused/recycled will be processed on-site or be taken to an approved facility, capable of accepting those materials. All other waste is to be disposed of in accordance with the classification of the waste at an approved licensed facility. Other materials (including, but not limited to, scrap metal) which are capable of being recovered, processed and/or recycled will be processed on-site or be taken to an approved facility, capable of accepting those materials. 	Operation
	7B	<ul style="list-style-type: none"> During operations, waste will be managed in accordance with the Waste Management Plan. 	Operation
	7C	<ul style="list-style-type: none"> The designated site manager or appointed responsible delegate should prepare monthly regular reports documenting the waste that has been received and generated. These should be prepared using waste receipts that have been retained and should include: <ul style="list-style-type: none"> Waste classification data to assess compliance with the EPA (2014) Waste Classification Guidelines A review of licenses held by the facilities where waste has been disposed to access/ensure their ability to accept the waste in accordance with relevant legislation Include any incident reports relating to waste (i.e. spills) which have occurred. Any corrective actions undertaken should also be included. 	Operation
	7D	<ul style="list-style-type: none"> Tracking and monitoring of scrap metal processed at the Proposal Site will be undertaken in accordance with the Waste Monitoring Management Plan 	Operation
	7E	<ul style="list-style-type: none"> The amount of waste received at the Proposal Site will be recorded on a daily basis in accordance with the Waste Monitoring Management Plan <ul style="list-style-type: none"> The Proposal Site will not knowingly cause, permit or allow any materials or waste generated outside the Proposal Site to be received at the Proposal Site for storage, treatment, processing, reprocessing, or disposal on the Proposal Site, except as expressly permitted by the EPL. 	Operation
8. Greenhouse Gas Emissions	8A	<ul style="list-style-type: none"> Where applicable, and practical equipment will conform to best practice for the management of greenhouse gas. 	Operation
	8B	<ul style="list-style-type: none"> Fuel, water and electricity consumptions shall be monitored, and efficiency improvements regularly investigated and implemented where reasonable and feasible. 	Operation
9. Biodiversity	9A	<ul style="list-style-type: none"> All vehicles are to keep to the existing and proposed access roads on-site at all times. 	Operation
	9B	<ul style="list-style-type: none"> Maintenance of landscaped areas should be undertaken in a way to prevent the spread of pests and noxious weeds in accordance with the Biosecurity Act 2015 and the New South Wales Weed Control Handbook - A guide to weed control in non-crop, aquatic and bushland situation (DPI, 2018). 	Operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
10. Visual	10A	<ul style="list-style-type: none"> Landscaped areas on-site would be monitored and maintained in accordance with the Landscape Management Plan 	Operation
11. Socio-economic	11A	<ul style="list-style-type: none"> Where possible, opportunities for offering apprenticeships for new work force and offer additional training for existing workforce would be investigated. 	Operation
	11B	<ul style="list-style-type: none"> Complaints will be managed in accordance with the Complaints Procedure. 	Operation